

## **WHISTLEBLOWER POLICY**

### **Introduction**

Millicom is committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, we expect employees, suppliers, consultants, contractors, business partners and others (“related parties”) whom we deal with and that have serious doubts or concerns about wrongdoings, to come forward and voice those concerns and resolve their doubts.

Employees are often the first to realize that there may be wrongdoings within Millicom. However, they may decide not to express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company, or they may also fear harassment or retaliation. In these circumstances, we insist that you do not ignore the concern, but to raise it, even if such report may only end up being merely a suspicion of wrongdoing.

A whistleblowing or reporting mechanism such as is set out in this Policy, invites all related parties to act responsibly to uphold the reputation of Millicom and maintain public confidence in our business. We are confident that encouraging a culture of openness will help to enhance Millicom’s image and reputation. This Policy aims to ensure that serious concerns are properly raised and addressed within Millicom and are recognized as a key tool in enabling the delivery of good governance practices.

### **Applicability**

This Policy applies to all companies of the Millicom group of entities, including its subsidiaries, affiliates and associates (“Millicom” or “the Company”), as well as to all its respective related parties.

### **Purpose**

The purpose of this policy is to encourage all related parties to report wrongdoings without the risk of subsequent negative consequences.

This Policy is approved and implemented as a clear statement that if any wrongdoing in Millicom or by its related parties is identified and reported, Millicom will endeavour to deal with it promptly and thoroughly investigate and remedy it as best as is practicable. Millicom will further examine means of ensuring that such wrongdoing is prevented in the future.

### **Background**

#### **1. What is whistleblowing?**

Whistleblowing is when someone raises a concern through any of the means of communication defined in the who should you contact section of this policy, reporting any suspicion of or wrongdoing in Millicom.

A culture of turning a "blind eye" to such problems means that the alarm has not sounded and those in charge do not get the chance to take action before real damage is done. Whistleblowing can therefore also be described as attracting management’s attention to information about suspected wrongdoings, in order to mitigate any risks that Millicom has which could result in economic or reputational damage.

## **2. What is wrongdoing?**

Wrongdoing is any conduct or behaviour that is or could be contrary to Millicom's values and ethical principles, mentioning without limitation:

- Non-compliance with applicable laws and regulations.
- Actions that violate Millicom's Code of Conduct and the Golden Rules.
- Violations of Millicom's policies and procedures.
- Criminal actions, like theft, fraud, bribery, money-laundering, etc.
- Actions that may result in danger to the health and safety of people, or could damage Millicom's property or the environment.
- Questionable accounting, financial reporting or auditing practices.
- Unprofessional conduct or conduct that does not comply with established standards of practice.
- Abuse of power or authority for any unauthorized or concealed purpose.
- Actions of discrimination or harassment in the course of the employment or provision of services.
- Conflicts of interest.
- Any conduct likely to be in violation of the U.S. Foreign Corrupt Practices Act or the UK Bribery Act, as respectively amended.
- Failure to rectify, or take reasonable steps to report any of the above, or any other matter likely to give rise to a significant and avoidable cost or loss to Millicom.

This list is not definitive but is intended to give an indication of the kind of conduct which might be considered wrongdoing. Interpersonal conflicts, relationship matters, employment promotion or performance evaluation related issues or any other kind of on-the-job conflict should be referred to the Human Resources department.

## **3. Reporter Protection – Non retaliation statement**

Anyone who raises a concern under this Policy will be protected if he/she:

- Discloses the information in good faith;
- Believes it to be substantially true;
- Does not act maliciously nor makes false allegations, and
- Does not seek any personal or financial gain.

For the sake of clarity, informing of potential wrongdoings detected in the ordinary course of business is an employment duty. Failure to report may constitute a violation of our Code of Conduct. For example, it is the duty of the members in the Finance Department to ensure that our accounting is accurate and transparent and it is their obligation to promptly inform of any suspected wrongdoing to their supervisor or their respective Head of Finance.

Anyone raising a concern under the above mentioned terms will be protected and we will not tolerate any retaliation against them. Any person who retaliates against anyone who has raised a concern in good faith is subject to discipline up to and including termination of employment.

Employees against whom allegations are made will also be protected to the extent possible. Millicom will make every effort to protect at all times the privacy and dignity of anyone being under investigation. Based on the circumstances, Millicom may decide to take preventive, interlocutory or interim measures in accordance with local laws.

## **4. Who should you contact?**

- a. In the means of supporting communication and trust within all Millicom operations, we recommend that anyone with a concern should first discuss the matter with their supervisor, manager, head of department or the person in charge of the department where the suspected wrongdoing is taking place. Should the matter not be resolved or if discussing it with any of the individuals mentioned above is not possible for whatever reason (eg potential involvement of the manager) , the individual can raise the matter directly with the Human Resources department or through any of the means of communications indicated in the paragraphs below.
- b. All employees may contact the Global Compliance Director or their designated Compliance & Business Ethics team member at the following phone numbers and emails:

**Linda Peralta (Global Compliance Director)**

Mobile: +44 7827 962159

Email: [Linda.peralta@millicom.com](mailto:Linda.peralta@millicom.com)

**Esther Palsgraaf (Compliance & Business Ethics Manager Africa English)**

Mobile: +255 713 123 539

Email: [esther.palsgraaf@millicom.com](mailto:esther.palsgraaf@millicom.com)

**Pape Mamadou Diallo (Compliance & Business Ethics Manager Africa French)**

Mobile: +235 9510 0535

Email: [papemamadou.diallo@millicom.com](mailto:papemamadou.diallo@millicom.com)

**Bolette Lerfeldt (Compliance & Business Ethics Manager South America)**

Mobile: +591 7739 0070

Email: [bolette.lerfeldt@millicom.com](mailto:bolette.lerfeldt@millicom.com)

**Luis Sanchez (Compliance & Business Ethics Manager Central America)**

Mobile: +503 7737 0007

Email: [luis.sanchez@millicom.com](mailto:luis.sanchez@millicom.com)

- c. All related parties may also contact our Millicom Ethics Line directly at [www.millicom.ethicspoint.com](http://www.millicom.ethicspoint.com) and submit a report through the internet or by calling any of the local phone numbers provided therein.

## 5. How the Company will respond

Millicom will be responsive and act upon any concerns raised under this Policy. Please note that Millicom will be able to assess the merits of your concern only after having conducted an initial inquiry and, if necessary, after duly investigating the matter in question.

In order to protect the individuals involved and those suspected of the alleged wrongdoing, an initial enquiry will be made to decide whether an investigation is appropriate and, if so, what form it should take. If urgent action is required; this will be taken before any investigation is conducted.

Within the next ten working days of a concern being raised, if provided an email for us to contact you, you will receive the following:

- a) Confirmation that the concern has been received;

- b) Indications of how the matter will be addressed;
- c) Estimation of how long it will take to provide a final response.

The amount of contact between the investigation team and you, considering the issues, will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, Millicom will seek further information from you.

Millicom will take steps to minimize any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, Millicom will arrange for you to receive legal advice about such procedures.

Millicom acknowledges that the person who raised the matter may want confirmation that it has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcomes of any investigation as indicated above.

The Global Compliance Director will maintain an adequate registry of all concerns submitted and will keep the Chairman of the Audit Committee duly informed of the reported cases and progress in the investigations, as well as ensure that the Audit Committee has adequate access to all relevant documentation.

## **6. Time Scale**

Concerns will be investigated as quickly as practicable. It should be borne in mind that some scenarios may need to be referred to an external advisor and that this may result in an extension of the investigative process. The seriousness and complexity of a concern may also have a negative impact upon the time taken to investigate the matter. A designated person will indicate at the outset the anticipated time scale for investigating the complaint. All concerns raised in complete anonymity in which we are not able to obtain further information to initiate an investigation within the next 30 days of your initial notification, will be dismissed.

## **7. Confidentiality and Anonymity**

All employees are invited and expected to report any wrongdoings. Millicom will respect the confidentiality of any whistleblower concern received where the individual reporting requests anonymity. Once a matter is reported, the identity of the individual will naturally be disclosed only to those in charge of the corresponding investigation. The investigating team will make every effort to respect confidentiality and anonymity, and will prevent any sort of retaliation against good-faith whistleblowers.

Even though Millicom respects and will follow up on all anonymous concerns, it is strongly recommended that individuals identify themselves in order to facilitate adequate follow up on all investigations. It must be appreciated that some information may be difficult to verify if provided in anonymity. According to local regulations in certain countries, employees may exceptionally be guided to refer any matters not related to financial or accounting wrongdoings on a non-anonymous basis.

## **8. False and Malicious Allegations**

Millicom is proud of its reputation and is striving to continue to meet the highest standards of honesty. It will therefore ensure that sufficient resources are put into investigating any complaint which it receives.

However, it is important for anyone contemplating making allegations to ensure that they are sincere and substantiated. No allegations should be made maliciously or with the knowledge that they are false.

Millicom will regard the making of any deliberately false or malicious allegations by any of its employee, as a serious disciplinary offence which may result in disciplinary action, up to and including termination of employment.