ENVIRONMENT POLICY

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I. TABLE OF CONTENT

II. Introduction

As we make digital inclusion a reality in our markets, and continue to invest in technology to support our growth, we impact the environment in a number of ways: notably through electricity and fuel consumption to run our network and operations, and electronic waste (e-waste) we generate as we upgrade our network and promote next generation devices to our customers.

Growing profitably and responsibly is at the heart of our company's strategy. We believe that private companies, like ours, have a role to play in finding solutions to the bigger challenges our planet is facing. At Millicom, in addition to complying with laws and legal requirements, we proactively monitor the social and environmental impacts and risks relating to our activities, products and services *(also referred to as 'environmental aspects' in the leading international environmental management standard ISO 14001)* and implement initiatives to control and reduce them but also to turn them into business opportunities where possible.

III. Purpose

This policy sets out Millicom's commitment and approach to reducing our environmental footprint, and the roles and responsibilities of our senior management and employees in living up to this commitment.

By adopting this policy, Millicom asks all of its employees and those providing services on behalf of the company to make all reasonable efforts to reduce energy and water consumption, implement alternative green energy solutions, embed environmental criteria in procurement decisions, prevent fuel spills, report environmental incidents and seek opportunities to reuse, reduce, and recycle waste.

IV. Scope

The principles and rules set out in this policy apply to all entities in the Millicom Group, in addition to any specific local rules or legal obligations in place. It is designed to provide guiding basic principles which will minimise our environmental footprint.

Executive monitoring and implementation of this policy is the responsibility of Environmental Sustainability Steering Group, chaired by EVP, Chief Technology and Information Officer (CTIO). Day-to-day monitoring and implementation is coordinated by the global corporate responsibility (CR) team. Reporting and investigation of environmental incidents is led by corporate security, with the support of CR teams as necessary, both at global and local level.

This policy should be used in conjunction with the HSE Management System HSE 001, HSE Manual HSE 002 and associated HSE Working Instructions.

V. Our commitment

As we deliver our Digital Lifestyle strategy, and continue to invest in technology to support our growth, we impact the environment in a number of ways, notably through electricity and fuel consumption to run our network and operations, and electronic waste (e-waste) we generate as we upgrade our network and promote next generation devices to our customers.

We are committed to identifying, managing and reducing our environmental impact, and continuously improving our environmental performance. We consider climate-related risks and opportunities in our business strategy, risk register, network expansion (e.g. placing new masts), and managing business continuity. Millicom will ensure appropriate resources are allocated to establish, implement, maintain and improve its environmental management system.

Our business units with highest potential environmental impact (i.e. network, integrated services or facilities management and fleet, supply chain and procurement) have procedures in place to identify environmental risks from their activities, develop a control and mitigation plan, and report their environmental performance as required by the Group.

VI. Implementation, and roles and responsibilities

Group Environmental Sustainability Steering Group (ESSG)

The role of ESSG is integrated into an existing steering group that reviews and oversees implementation of operational efficiencies. The group is formed of Millicom's senior management and chaired by EVP, CTIO. ESSG sets Millicom's direction for environmental management, including our environment strategy, five year roadmap, and long-term targets.

Legal and compliance team

- **Ensure legal compliance and go beyond legal compliance:** Millicom operates in emerging markets where a holistic environmental legislation may not be established. While we meet all the legal compliance criteria, we work to proactively roll out our best practices in countries where environmental legislation may not exist or be comprehensive.

Group senior management and CR team

Millicom's corporate responsibility team will work closely with our senior management, key departments and all workforce to:

- **Report on our environmental performance:** Millicom annually reports to all its stakeholders the Group's environmental performance against targets via its corporate responsibility report. Key performance indicators are aligned with our most material issues as identified by our stakeholders and a strategic review of our business priorities, such as energy consumption and quantity of e-waste recycled.

All employees and contractors undertaking work on behalf of Millicom or its operating entities

- Read and comply with this policy; and attend any training required to undertake their work.
- **Report environmental incidents:** We all have a responsibility to report environmental incidents or hazards via our global incident management tool. Millicom shall investigate all reported cases with a view to determining their cause and to determining the action that should be taken to prevent any similar accident in the future.
- **Reduce environmental impact**: Where possible, reduce energy consumption by switching off lights or monitors, and recycle waste.

Network, integrated services, facilities management and fleet management teams

- **Reducing energy consumption and reliance on diesel or gasoline:** Each team looks for opportunities to reduce its electricity or fuel consumption, as well as to roll out alternative energy sources, such as solar power and hybrid battery solutions.

Network teams

- **Reducing energy consumption:** Total electricity and fuel consumption to run our networks presents a significant proportion of our site management and maintenance costs and our overall carbon footprint. Each operation reviews network modernisation, equipment swap to more

energy efficient technologies, site-sharing with other network operators, and similar initiatives to reduce our energy consumption.

- **Business continuity management:** Each Millicom operation has a business continuity management plan that accounts for continuity of operations during extreme climate events; and mitigation action plans where needed are outlined and implemented.

- **Pollution risk assessment and emergency response**: Each operation integrates an environmental risk assessment into existing risk procedures. The risk assessment as a minimum considers risk of oil or fuel spillage, ground and water contamination; and is reviewed and revised on an annual basis for all engineering and maintenance activities. Preventative and pollution control measures, such as spillage control systems, are identified and implemented in line with the risk assessments. Each operation has an emergency response plan in place for oil and fuel spillages, ground and water contamination.

- **Engineering and maintenance:** Our employees and network roll-out, maintenance and managed services contractors are required to take all necessary precautions to prevent fuel spills and soil contamination, and ensure waste is reused or recycled where possible. CTIO in each operation has overall responsibility to ensure anyone performing tasks that may have a potential to cause a negative impact on the environment (e.g. fuel spills, replacing generators or oil filters) have appropriate training and formal qualifications where relevant, and associated records are retained. This also applies to monitoring and performance review of managed services suppliers. Alignment will be self-assessed periodically against Millicom Internal Control Manual.

- **Site planning and management:** As we expand our operations and build new sites, we consider environmental impacts, such as any impact on biodiversity; ensure we operate within nationally required environmental permits; and mitigate any visual pollution where required. Where new sites also require building access (such as a road) to the sites, we follow the same approach. We also require our suppliers for site selection and infrastructure management services to do so.

- **Manage e-waste responsibly:** We first look for opportunities for reuse of obsolete equipment – either within our network or by selling to peers. If this is not an option, network teams are supported by supply chain and corporate responsibility team to manage and dispose of obsolete equipment through our global e-waste management programme and vetted vendors.

- **Electromagnetic fields:** As part of the planning and site location, Millicom engages with the local communities and citizens regarding radio frequency electromagnetic fields. Network teams work closely with corporate responsibility and communication teams in engagement with communities.

Supply chain and procurement teams:

- **Manage supply chain risk:** Our suppliers provide us with a diverse range of products and services, from tower maintenance and power supply to logistics or devices, which contribute to our total environmental footprint.

  All buyers shall require suppliers to sign the Supplier Code of Conduct, which outlines our environmental protection requirements, as a mandatory annex of the purchasing agreement. Buyers are responsible for record keeping of the signed Supplier Code, and reporting to the Group via the Supply Chain Managers (SCMs) the number of signings. Process outlined in the Supplier Code of Conduct Guideline should be followed in the cases suppliers refuse to acknowledge the Code.

Millicom monitors suppliers' exposure to sustainability risks and promotes high levels of responsible conduct across our value chain. As and when required, the procurement team conducts supplier assessments, due diligence and vetting of potential suppliers in collaboration with the corporate responsibility team.

- **Responsible management of e-waste:** Obsolete network or IT equipment or handsets have value either for reuse or in parts. All warehouse managers and SCMs will manage and dispose of e-waste through responsible vetted vendors, as defined in the global e-waste project plan.

- **Electromagnetic fields:** We require that the base station equipment and mobile phones we purchase comply with international safety limits set by the industry body ICNIRP (International Commission on Non-Ionizing Radiation Protection) and any stricter local requirements, as outlined in our Supplier Code of Conduct.

VII. Other relevant documents

The Corporate Responsibility department is always available to discuss this policy and or associated information, instruction or awareness. CR@Millicom.com

This policy should be used in conjunction with the directives and guidance information set out within the following:

- HSE 001 Health, Safety & Environment Management System;
- HSE 002 Health, Safety & Environment Manual