Corporate Responsibility Report 2015

25 years of focusing on what matters
Welcome to our Reporting Suite 2015

We have designed our 2015 reports to provide a comprehensive overview of the business. More detailed information is available online at www.millicom.com.

About this report
This is our fourth annual stand-alone Corporate Responsibility (CR) Report covering the calendar year 2015. In line with our mission to lead the adoption of a Digital Lifestyle in our markets, and our belief that our corporate reporting should reflect who we are, we are working to further integrate our financial and non-financial reporting. This is the first year our annual financial report goes ‘digital first’, and we will move towards this approach with our non-financial reporting in 2016.

This year the scope of our CR Report has been expanded to include data from our fixed line business in Colombia, following our merger with UNE in 2014. The report covers our operations in 13 markets and our corporate offices in the US, Luxembourg and the UK. Our African markets covered are Chad, Democratic Republic of Congo, Ghana, Rwanda, Senegal and Tanzania; while in Latin America we cover our operations in Bolivia, Colombia, Costa Rica, El Salvador, Guatemala, Honduras and Paraguay. As in 2014, this report does not include data from our business in Nicaragua, as our business in that country is small and focuses solely to the corporate sector.

This year, for the first time, we are publishing a stand-alone Law Enforcement Disclosure report to help our stakeholders understand the context in which we operate telecommunications networks and interact with law enforcement agencies.

In 2014, we set a clear CR strategy and roadmap for the next five years. In this report, we demonstrate the strong progress we made in 2015 against our strategy in implementing key initiatives. We outline our focus, highlights from our work, and any challenges we faced in 2015 and our plans for continuous improvement of our performance.

The report also covers what we consider to be our eight most material sustainability impacts, which were confirmed through a comprehensive process of interviews and surveys with our key stakeholders during 2015. We devote a chapter to each of these issues, covering our approach and ambition in each area, our performance during the year, and our future priorities.

This report has been produced in accordance with the Global Reporting Initiative (GRI G4) Guidelines, core level. The report has also been externally assured in accordance with the AA 1000 Assurance Standard (2008).

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We are Millicom. We are the telecommunications and media company focused on emerging markets.

We operate across 14 frontier and emerging Latin American and African markets with high GDP growth, a young population and huge opportunities for the adoption of the Digital Lifestyle.

We provide fixed and mobile telecommunications services, cable and satellite TV, mobile financial services (MFS) and content such as music and sport to more than 62 million customers via our main consumer brand Tigo. At Tigo Business, we provide digital products and services to governments, multinationals, large corporations and small and medium businesses.

In 2015 we celebrated our 25th year and we will continue this successful journey, growing our business profitably, responsibly and with real social purpose. Our mission is to lead the adoption of a Digital Lifestyle in our markets. And our vision is that, by doing this, we will empower all, customers and employees, to advance in life and find joy.

Employees
15,956 in Latin America
13,351 in Africa
2,245 of local nationality
97%
Senior managers recruited locally
85%
Women in senior management
25% (approximately top 600 positions)

1This total figure includes staff employed by Tigo Nicaragua, Zantel in Tanzania, and Edatel, Emtelco, ETP and Orbitel in Colombia. This report excludes any other data from these operations, as we work on aligning non-financial reporting.
CEO statement

I am delighted to have taken the helm of the Company at such an exciting time.
In its first 25 years, Millicom has had an incredible journey connecting the unconnected, today bringing the Digital lifestyle to over 60 million customers in 14 emerging markets across Latin America and Africa.

This year we have articulated a new vision to start the next quarter of a century: to enable people to advance in life and find joy.

This vision speaks a lot about our passion and what we believe to be our purpose. The products and services we provide touch many elements of daily life and can deliver positive social and environmental impacts. We provide critical and vital infrastructure ranging from access to basic fixed and mobile telephony to truly disruptive products, such as mobile financial services. As we grow, connect and innovate, we want our growth to be responsible.

Consequently, we take a holistic approach to ethical business and corporate responsibility. These are not add-on functions but at the heart of how we work.

Board director and senior management involvement and oversight are essential if we want to be the leaders in our markets in doing business the right way.

During 2015 the Government Relations and Corporate Responsibility (GRCR) Committee of the Board that oversees the delivery of our CR strategy and monitoring of emerging risks increased its scope and meeting frequency to once a quarter. Progress in our five Corporate Responsibility focus areas is assessed in each Executive Committee meeting.

We have established a Corporate Compliance Committee, including all Executive Committee members, that reviews progress relating to our anti-bribery and anti-corruption (ABAC) programme monthly, and other progress in our journey towards continuously improving business conduct practices.

Transparency is equally important to build trust in our ethical commitments and for us to be able to engage stakeholders to work together on challenges we cannot solve alone. This year, Millicom was among one of the two companies who ‘walk the talk’ in sustainability according to the study conducted by the Stockholm School of Economics. This is the way we want it to be.

In October, we voluntarily reported to the US and Swedish authorities potential improper payments made on behalf of our joint venture in Guatemala. During the year, we carried out extensive work to make our ABAC programme more robust and effective, including strengthening our policy framework and due diligence mechanisms, delivering training on our ABAC programme, and promoting Millicom Ethics Line. We also commissioned an external review of the programme to assess if we can improve it even further.

Over the last year we have delivered a number of industry-leading CR initiatives that support the success of our core business strategy. We are on target with our five-year plan for CR and have completed much of the ground work relating to policies, risk and impact assessments, materiality analysis and process design. The year to come will focus on further ensuring CR is fully integrated into everyday business.

Our people are our top priority. In 2015, we suffered 17 fatalities, one in our direct business operations and 16 among contractors who work closely with us. This is 17 too many. It is essential that we invest in safer working conditions for everyone in our business and that everyone in the Company, regardless of their role, takes responsibility for ensuring each other’s safety. I have personally signed off on target with our five-year plan for CR and have completed much of the ground work relating to policies, risk and impact assessments, materiality analysis and process design. The year to come will focus on further ensuring CR is fully integrated into everyday business.

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Overview | Strategy | Performance | Assurance

Personally, I’m particularly proud of our work in child online protection. We want to ensure that both parents and children are empowered to take full benefit of the Digital Lifestyle with knowledge of how to stay safe. Over the last 12 months, our industry-leading child online protection conferences brought together policy makers, law enforcement agencies, civil society and our peers in four of our markets to improve child online safety. We will continue these efforts in the coming year.

We have taken important steps to better understand our suppliers’ exposure to sustainability risks and to promote high levels of ethical conduct across our value chain. In 2015 the focus has been on increasing our understanding of where risks may lie. Integrating an approach of assessments, corrective action plans and audits has become even more important as we have outsourced some core functions, such as managed services in 2015.

Some of our markets have been particularly challenging in terms of security risks in 2015. Balancing our desire to support governments in tackling organised crime and terrorism with the need for a framework to protect the data and freedom of expression of our customers, is a topic we have and will continue to closely monitor at Board level.

Looking forward to 2016, our focus will remain on how we do things, as much as on what we do. Our priorities are to stay safe, develop diverse talent, be inclusive and act responsibly and ethically. I look forward to further embed these priorities in our way of doing business.

Mauricio Ramos
President and Chief Executive Officer

2015 saw solid progress and some important milestones in our efforts to lead our industry in acting responsibly. Personally, I’m particularly proud of our work in child online protection. We want to ensure that both parents and children are empowered to take full benefit of the Digital Lifestyle with knowledge of how to stay safe. Over the last 12 months, our industry-leading child online protection conferences brought together policy makers, law enforcement agencies, civil society and our peers in four of our markets to improve child online safety. We will continue these efforts in the coming year.

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Growing responsibly and with purpose is at the heart of our company’s vision, and making digital inclusion a reality – especially for often difficult to reach audiences – is what drives us forward. Our goals of changing lives through championing the Digital Lifestyle and empowering people to advance in life and find joy are fully supported by our Corporate Responsibility (CR) strategy.

Our strategy

Two years on from the launch of our five-year CR strategy, we are making steady progress on our overall ambition to integrate responsible business practice into our everyday activities and leading our markets in doing business the right way. We outline our progress against the three key objectives supporting the implementation of our strategy below:

<table>
<thead>
<tr>
<th>Five-year objectives</th>
<th>What we did in 2015</th>
<th>Find out more</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measure the success and health of our company beyond financials.</td>
<td>strengthened our CR reporting to make more informed business decisions</td>
<td>See Key Performance Indicators from page 48.</td>
</tr>
<tr>
<td>Promote, protect and strengthen our reputation.</td>
<td>conducted a materiality re-assessment with our key stakeholders</td>
<td>See our Materiality section on page 8.</td>
</tr>
<tr>
<td>Demonstrate thought leadership in areas that link to business success.</td>
<td>delivered five industry-leading child online protection workshops with UNICEF, governments and other stakeholders</td>
<td>See the Child protection section on page 18.</td>
</tr>
</tbody>
</table>

How we manage CR, compliance and health and safety

In 2015, the remit of the Corporate Responsibility Committee of the Board of Directors was expanded to cover Government Relations, in recognition of the close links between these two functions. Since September 2015 the Committee has met quarterly given the very dynamic nature of many of the issues handled. Our Executive Vice President (EVP) of External Affairs is directly accountable to the GRCR Committee for delivering our CR and social investment strategy. The Executive Committee is informed monthly on progress in CR strategy implementation. For more information on the members of the Committee and key activities in 2015, see the Governance and Financial Report.

Spotlight

Millicom completes Zantel acquisition

In October 2015, we announced completing the acquisition of an 85% stake in Zanzibar Telecom (Zantel). Zantel is the leading mobile telecom operator on the island of Zanzibar with gross revenues in 2014 of $82 million. It operates 2G and 3G services over 545 network sites and has ownership rights to undersea fibre optic cable capacity. Zantel has an approximate 5% share of the Tanzanian mobile market. Zantel has a strong social investment programme, with focus on education and digital inclusion. In 2016, we will work closely with our team in Zantel to align management of CR and non-financial reporting.

How CR is governed

Our Corporate Compliance Committee meets at each Executive Committee meeting. Anti-corruption issues are reviewed at Board level by the Compliance and Business Conduct Committee of the Board.

The Executive Committee receives monthly reports on progress in all of these areas via the respective EVPs.

This page provides an overview of our strategy, including key objectives, leadership and management structures, and an update on our progress.
Our strategy

In 2014 we reported on our progress in the five focus areas overseen by our CR team – protecting children’s rights, responsible supply chain management, gender diversity, reducing our environmental impact, and privacy and freedom of expression.

This year, we have structured our report according to what we consider are our eight most material CR issues – the five topics above, as well as acting responsibly (anti-corruption compliance), taking care of our people (health and safety), and social investment.

Re-assessing what’s material

Our five-year CR strategy had its foundation in the materiality analysis we conducted with our stakeholders in 2013, which enabled us to identify clear focus areas and key milestones. This strategy was also rooted in our Digital Lifestyle strategy which was then launched. The CR strategy naturally is shaped by continuous dialogue with our responsible investors, partners, and other stakeholders.

During the first two years of the strategy, we identified our key impacts, risks and opportunities and developed clear action plans by area. During 2015, our main focus was on putting these plans into practice and starting the integration with our core business strategy with clear policies and process plans. By the end of 2015, we felt it was time to seek our stakeholders’ input on whether we are still focusing on what is most material to our business and markets, and to identify any emerging issues.

At the end of 2015, we conducted interviews and online surveys with 25 of our key stakeholders. We consciously chose a smaller group of stakeholders – those who follow Millicom, who know our work and market well and with whom we have longstanding relationships – to ensure high quality feedback. Stakeholders were asked to consider our eight most important issues – as reflected in this report – and give their comments on their relative importance and whether they identified any other emerging issues. The responses are summarised in the relevant chapters, and we have considered the priorities they identified in setting our 2016 targets.

• Disaster preparedness and response
• Land acquisition and management for our network
• Related community engagement
• Anti-corruption measures
• Climate resilience
• Stability and reliability of our network
• Transparent and fair pricing and billing

Revised materiality matrix

The topics in the top right-hand quadrant are those that we consider to be of strategic importance to our business and that are also of high importance to our stakeholders. We outline our targets, progress to date, and future plans for the majority of these issues in this report, with two exceptions. Given that we are working towards integrating our financial and non-financial reporting, we felt that social innovation through our products and services was better placed in the Annual Report. We know pricing and billing is an important issue to our stakeholders and we will work on a global responsible marketing policy in 2016.

For the first time, we also decided to conduct a materiality survey with our stakeholders in each market, as our stakeholders and auditors had highlighted the importance of ensuring our global strategy remains relevant to our operational risks, opportunities, and the needs of our local stakeholders. We will report on the key findings in our country factsheets, which will be published later in 2016.

Ongoing stakeholder dialogue

As well as engagement to assess materiality, we maintain regular dialogue with stakeholders at both global and country level – including responsible investors, industry peers from initiatives such as the Telecommunications Industry Dialogue, NGOs and governments. This enables us to put our priorities and initiatives to the test on a regular basis. We have also established partnerships with a number of organisations including GSMA, UNICEF, Global Network Initiative (GNI), and Civil Rights Defenders. At country level, we have various platforms such as Voice of Customer committees, social media, and Brand Tracker surveys to engage with our customers, and we also engage with local governments and NGOs.

We outlined key stakeholder groups, how we engage with them, and key topics they raised in our 2014 CR report. The channels and engagement topics we outlined in our 2014 CR report are still relevant to our operation and stakeholders. Please refer to page 12 of the 2014 report for more information.

Overall, our stakeholders reaffirmed our material issues and felt that we are making good progress and demonstrating leadership on child protection, social innovation and privacy and freedom of expression, but that we should focus more on implementing a global, consistent responsible supply chain management programme and show results at global level. We are confident that we have demonstrated strong progress in this area in 2015 through our partnership with EcoVadis. For further information please see page 40.

In addition to confirming the material issues, a number of other topics were mentioned as priority areas for us to address in our future work and reporting:

• Disaster preparedness and response
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<th>Approach/ambition</th>
<th>Key stakeholders</th>
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<td>Privacy and freedom of expression</td>
<td>Balance customer rights with government efforts to protect public safety</td>
<td>Be as transparent as we can about our interactions with law enforcement</td>
<td>Customers, Governments, Investors, Peers, Non-profits</td>
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<td>Child protection</td>
<td>• Young population in our markets • Inherent child labour risk • Child online safety</td>
<td>Industry leadership and collaboration to promote child rights and online safety</td>
<td>Customers, Governments, Peers, Non-profits, Suppliers</td>
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<td>Acting responsibly: anti-corruption compliance</td>
<td>• Risk of corruption in markets we operate • Compliance and responsible business practice to build trust</td>
<td>Zero tolerance approach, with mechanisms in place to manage compliance risks</td>
<td>Customers, Governments, Employees, Investors, Suppliers, Peers, Non-profits</td>
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<td>Reducing our environmental footprint</td>
<td>We consume energy and generate electronic waste in our network operations.</td>
<td>• Improve energy efficiency in data centers and network • Responsible e-waste recycling</td>
<td>Employees, Governments, Suppliers, Investors, Customers</td>
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<td>Promoting diversity</td>
<td>Diverse thinking needed to meet diverse customer needs and deliver strong business performance</td>
<td>Increase women in senior management and reduce turnover of female staff under 30</td>
<td>Employees, Customers, Governments, Investors, Non-profits</td>
</tr>
<tr>
<td>Taking care of our people</td>
<td>• Countries of operation with varying safety standards and risk of violent crime • Investing in people</td>
<td>Focus on zero fatalities, nurture local talent, offer development plans and mentoring</td>
<td>Employees, Investors, Non-profits, Peers</td>
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<td>Reputation and sustainability risks in supply chain</td>
<td>Supplier monitoring and corrective action plans</td>
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<td>Empowering communities through our core range of products</td>
<td>Focus on four key themes: digital inclusion, education, health, and entrepreneurship and financial inclusion</td>
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**Strategy summary**

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**Controlling the implementation of key policies**

In 2015 we strengthened our internal controls across a wide range of financial and non-financial issues. All operations3 self-assessed their management of business risks and opportunities against controls listed in the Millicom Internal Control Manual (ICM). These assessments included controls on compliance, H&S and CSR topics.

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<th>Internal control</th>
<th>Find out more about our progress</th>
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<td>Privacy and freedom of expression</td>
<td>There are processes in place to manage law enforcement assistance requests.</td>
<td>See page 14 in this report and the Full Law Enforcement Disclosure report. Our policy on law enforcement assistance is also available on our website.</td>
</tr>
<tr>
<td>Child protection</td>
<td>We have local guidelines regarding minimum age of hiring for our employees, dealers and freelancers.</td>
<td>Find out more about our minimum age policy on page 48. Our policy on child labour is also available on our website.</td>
</tr>
<tr>
<td>Acting responsibly: anti-corruption compliance</td>
<td>Channel to report unethical behaviour are in place, and reported problems are investigated in a timely manner with disciplinary actions taken when necessary.</td>
<td>To find out more about the Millicom Ethics Line, the number of cases reported, investigations undertaken and outcomes, see page 25.</td>
</tr>
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<td>Reducing our environmental footprint</td>
<td>We have targets around energy reduction and consider opportunities for responsible e-waste management.</td>
<td>For our performance against targets, and progress in our e-waste programme, see page 27.</td>
</tr>
<tr>
<td>Taking care of our people</td>
<td>H&amp;S: Our processes ensure security and access risks are defined and communicated, incidents are reported, risk assessments are undertaken and control measures applied. Career development: All employees receive annual performance and development reviews, which includes defining objectives.</td>
<td>Find out more about our H&amp;S management on H&amp;S’ keeping our people safe on page 36. Investing in our people is one of our strategic pillars. Read more on Developing our employees on page 37.</td>
</tr>
<tr>
<td>Responsible supply chain management</td>
<td>Our main suppliers acknowledge our Supplier Code of Conduct (‘Code’).</td>
<td>For the number of suppliers who signed our Supplier Code, see page 54.</td>
</tr>
</tbody>
</table>

In 2016, we will add new control measures around physical security and business continuity to the ICM. We will develop internal control measures for diversity, volunteering and sponsorships and donations for the 2017 version of the ICM. In all operations, General Managers continue to have ultimate ownership of their country’s internal control assessments to ensure processes are carried out efficiently and that the risks and control activities are managed adequately.

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3 All operations except for Colombia, as TigoLINE continued working on integration of processes, and conducting self-assessment against controls listed in the ICM. In 2016, general managers continue to have ultimate ownership of their country’s internal control assessments to ensure processes are carried out efficiently and that the risks and control activities are managed adequately.
Spotlight on: Stakeholder engagement – how do our partners benefit from working with Millicom?

We identified three areas as opportunities for strategic engagement: child protection, responsible supply chain management, and privacy and freedom of expression. We have a strategic partner in each of these areas, and outline below how we, and they benefit from our work together.

Country partnerships: a case study from El Salvador

**Partner**
- FUNDEMAS

**How Millicom benefits from the partnership**
- FUNDEMAS is one of the few expert organisations on corporate responsibility working in Central America. Their expertise and regional knowledge strengthens our approach when we aim to transform the lives of Salvadorians through access to technology in education, health, environment, and financial inclusion.

**What our partner thinks of our partnerships**
- “FUNDEMAS aims to support the economic, social and environmental development of El Salvador. We are grateful for the support of several organisations that share our commitment to the sustainable development of the country, including Tigo El Salvador who has helped us promote various initiatives that reflect the positive impact of sustainability in business and in society.

Our partnership has helped us make progress in boosting sustainable development in El Salvador in a number of ways, for example by integrating corporate responsibility (CR) into the value chain, as we designed and delivered CR training to Tigo’s strategic suppliers. In addition, Tigo’s support of our annual event - Corporate Social Responsibility (CSR) Week - has enabled us to share best practice around CSR management with nearly 2,000 attendees.

We are pleased to have the support of Tigo as a leading national example of the impact business can achieve in society.”

Doña Elena María de Alfaro, President of FUNDEMAS
In many countries the laws relating to emergency and national security powers of the authorities are broad and non-specific — meaning that in emergency situations (themselves not clearly defined) the authorities are within their powers to ask for extreme responses from us. When national security powers are cited as the reason, strong sanctions for non-compliance — including imprisonment — may apply, and decisions to challenge requests are complex.

We would welcome more technical assistance to developing countries from the international community in the area of cyber investigations, as well as in designing transparent and clear laws around surveillance. Indeed, advocating and helping to define what makes clear surveillance law, an area on which we intend to focus more in the future.

Requests from law enforcement

There is at present no standardised way of classifying law enforcement requests for reporting purposes. At Millicom, we classify them into three categories: requests for interception, customer metadata, and mobile financial services data.

In 2015, in order to improve the quality of the data we report, we created a reporting template for those operations that due to lower number of requests did not have specific tools to record the details of each request.

As the table on the next page shows, the majority of the requests we receive are for customer ‘metadata’. This is information such as call records, IP address or location information. Most of these requests, however, are requests to confirm the identity behind specific telephone numbers.

Occasionally, we reject a request. In countries that have systematically recorded the number of rejections, this amounts to 3-5% of all requests. The most common reason for rejecting requests is that the authorities are not following due process. Our capacity to make sound decisions about when we may do this has been enhanced by our improved understanding of the legal frameworks in each country, but also underscores the importance of specific and detailed due processes by legislators to promote rule of law.

Progress in 2015

Engagement

We are one of the founding members of Telecommunications Industry Dialogue on Freedom of Expression and Privacy (TID), an industry group jointly addressing issues of privacy and freedom of expression as they relate to the telecom sector. In 2015 TID met quarterly face to face and every week over the phone. We strongly advocated for the TID to combine with the Global Network Initiative, which will allow us to fully participate in what we consider to be a critical debate with more than 50 organisations, human rights experts, investors, academics and internet companies.

At the end of 2015 we signed a three-year donations agreement with international human rights organisation Civil Rights Defenders to increase bilateral sharing of information on situations on the ground in our markets and to create links with local human rights defenders.

Concurrently, we engage directly with in-country governments and other stakeholders on the topic as much as possible. Discussions are held with Ministers of Interior and Security, as well as ICT and relevant Security Services. We also discuss topics regularly with relevant diplomatic representatives.

Mapping legal frameworks and exposing challenges

In 2015 we completed a mapping exercise of legal frameworks and government powers for surveillance, content blocking and service shutdowns that exist in each of our countries of operation, identifying the exact laws and acts by which local operations must abide. This information is now centrally stored and can be accessed by Millicom’s legal staff and members of the LIP Committee.

The mapping exercise revealed the extent of the challenges we and other telecom companies face when responding to requests for surveillance, customer data or service suspensions. In particular, it demonstrated that only a few of the countries in which we operate have clear laws and processes on who is allowed to make such requests, and in what circumstances.

In 2016 we plan to conclude our mapping exercise.

Approach and ambition

Our priority is to ensure we achieve the right balance between our obligation to respect local laws and our duty to protect our customers. To this end, in 2015 we focused on deepening our understanding of the legal frameworks and government powers in the countries we operate in, as well as on improving our processes for capturing information about the law enforcement requests we receive.

We are committed to being transparent about how we deal with government requests. In addition, we are eager to advance the understanding of the challenges and situations telecom companies face – and the contexts in which they have to make decisions – and to advocate for clearer laws in respect to requests for surveillance and customer data.

Governance

Our internal cross-functional Lawful Interception Policy (LIP) Committee and its members prepare and jointly approve policies and processes, review ‘major events’ and arising risks, and approve Millicom’s reporting and engagement relating to privacy and freedom of expression. The committee met three times in 2015, approving a ‘Major events’ Guideline and the Millicom Group Guideline for Law Enforcement Assistance (LEA) Requests.

Our commitment to the International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights are included in the updated Millicom Code of Conduct, which was approved in 2015. In addition, Millicom has signed up and made a commitment to implement the Principles on Freedom of Expression and Privacy for the telecommunications sector as defined by the Telecommunications Industry Dialogue (TID).
Overview of ‘major events’ by type

<table>
<thead>
<tr>
<th>Type of event</th>
<th>Occurrences</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shutdown of services</td>
<td>8</td>
</tr>
<tr>
<td>Proposals for significant changes in local laws</td>
<td>3</td>
</tr>
<tr>
<td>Proposals for significant changes in technical or operational procedures</td>
<td>3</td>
</tr>
<tr>
<td>Interception or customer data requests outside of due process</td>
<td>2</td>
</tr>
<tr>
<td>Politically motivated messages</td>
<td>2</td>
</tr>
<tr>
<td>Other</td>
<td>2</td>
</tr>
</tbody>
</table>

Major events
Requests that fall outside of the three categories described previously are classified as ‘major events’ – although, as with law enforcement requests, there are no standardised definitions for these. They may include (but are not limited to) requests for:
- shutdown of specific base station sites, geographical areas or entire network;
- interception requests that are disproportionate or outside of due process;
- denial of access for specific individuals; and
- significant changes to local laws or operational procedures relating to government powers of surveillance or data retention.

Major events in our markets compared to 2014. These figures represent a significant increase in ‘major events’ in our markets compared to 2014. This is partly because our more structured approach to handling these events means we are more aware of them, but it has also been a tumultuous year in many of our markets. In response to this, we have stepped up our engagement with governments and have also shared our experiences of shutdowns in several forums in 2015, with the aim of sharing industry best practice and increasing general understanding of these situations.

Spotlight
Mapping legal frameworks
In 2015 we completed a mapping exercise of legal frameworks and government powers for surveillance, content blocking and service shutdowns that exist in each of our operations, identifying the exact laws and acts by which local operations must abide. This can be a surprisingly complex exercise as often such powers are not defined in single texts but found inside several separate pieces of legislation.

The information is, and will be, of significant support for speeding up legal reviews. Having this information available at global level also helps us support the local teams in specific situations.

Information about the legal frameworks from four of our operations (Colombia, DRC, Ghana and Tanzania) has been published as part of the joint legal frameworks research of the FIWG, which looks forward to publishing the full set of information on more of our operations in 2016.

Information security
Millicom’s Information Security Management System establishes security requirements, aiming to make our network more resilient to emerging threats, to ultimately support the corporate strategic objectives. The framework allows for a risk-driven approach to protect the confidentiality, integrity and availability of Millicom’s information and technology assets. It is based on the international code of practice for Information Security Management ISO/IEC 27001.

A risk assessment process is in place to identify new risks, and all relevant risks are then subjected to a formal risk mitigation plan. The Information Security Committee, formed of Executive Committee members and senior managers, meets quarterly to provide oversight of all Information Security risks, and all relevant risks are then subjected to a formal risk mitigation plan. The Information Security Committee, formed of Executive Committee members and senior managers, meets quarterly to provide oversight of all Information Security risks, and all relevant risks are then subjected to a formal risk mitigation plan. The Information Security Committee, formed of Executive Committee members and senior managers, meets quarterly to provide oversight of all Information Security risks, and all relevant risks are then subjected to a formal risk mitigation plan. The Information Security Committee, formed of Executive Committee members and senior managers, meets quarterly to provide oversight of all Information Security risks, and all relevant risks are then subjected to a formal risk mitigation plan.

In 2015, we conducted a gap analysis against the Millicom Information Security Standards, and put remediation plans into place with actions mapped for 2016 to implement these remediation plans. We also continue delivering training for employees on different aspects of Information Security and data protection.

Next steps for 2016
Advocating for and helping to define what makes clear surveillance law is an area on which we will focus strongly in 2016. We will focus on leading work for this area for the Telecommunications Industry Dialogue in 2016, and are encouraged that the Freedom Online Coalition has also established a working group in this area.

At the beginning of 2016, along with six other telecom companies, we were accepted as observer members of the Global Network Initiative, with the aim of becoming full members in 2017. We look forward to engaging in the GNI’s committee and policy work, sharing best practices on conducting human rights due diligence, and working together on GNI implementation guidelines.

Internally, we will continue to strengthen the implementation of our existing guidelines for law enforcement assistance requests and ‘major events’. We are also in the process of building a wider framework on digital rights with a separate cross-functional team.

For more information please see our website for our full Law Enforcement Disclosure Report.
Why is this important to us?
The populations in our markets are young, making it important for us to understand how our business affects child rights. Inherent risk of child labour at both ends of our value chain is high, but there are also many other ways in which our daily work may impact children’s lives.

One such area is child online protection (COP). The internet can open huge opportunities for children. However, in many of our markets legal frameworks to protect children in the digital world are under-developed. This gives us a significant opportunity to ignite dialogue and collaboration with governments, our strategic partner UNICEF, and other key stakeholders. How services are delivered and internet access is also vary, meaning some lessons from good work in Europe can be applied.

Approach and ambition
We want to lead our industry to better understand and manage its impacts on the rights of children.

We partnered with UNICEF to design, test and utilise tools for understanding how our sector impacts children’s lives and can promote children’s rights. The tool covers all areas for mobile network operators (MNOs) to better understand and manage its impacts on the rights of children. Since 2014, we have been working together with UNICEF to develop a Mobile Operator Child Rights Impact Self-Assessment (MO CRIA) tool specifically for mobile network operators (MNOs) to better understand how our operations impact and can promote children’s rights. The tool covers all areas defined in Children’s Rights and Business Principles, highlighting some very specific issues for MNOs, such as:

- using the internet safely;
- child labour risk in the distribution of prepaid scratch cards, supply chain (electronics manufacturing) or during recycling of electronic waste to extract valuable ores;
- security arrangements and providing guidance to security guards on never using force on children while guarding our assets; and
- safeguarding of potentially dangerous infrastructure from child access.

Millicom tested a draft version of the tool in Tanzania and Rwanda in 2015, and we shared our recommendations on how to improve the usability of the tool, as well as key findings from the assessments with UNICEF. Our findings were used to finetune the tool for consultation by the industry, for the final version to be launched in 2016 for the use of all MNOs.

Number of operations with child rights impact assessments conducted

4 out of 13

Progress in 2015
Defining material child rights issues for our sector
Since 2014, we have been working together with UNICEF to develop a Mobile Operator Child Rights Impact Self-Assessment (MO CRIA) tool specifically for mobile network operators (MNOs) to better understand how our operations impact and can promote children’s rights. The tool covers all areas defined in Children’s Rights and Business Principles, highlighting some very specific issues for MNOs, such as:

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Top stakeholder concerns on this issue
The top three initiatives our stakeholders said we should prioritise were:

1. Putting in technical measures to prevent access to child sexual abuse sites.
2. Working with governments and other stakeholders on child online protection.
3. Creating safe online environments for children (e.g. by implementing parental control measures, age verifications, etc.).

2015 Targets | Status | Progress | 2016 Target
---|---|---|---
Carry out first internal review of child labour and young workers policy compliance in 2015 across all our operations. | All operations completed self-assessment against minimum age of hiring controls outlined in our Internal Control Manual. Seven of our operations indicated they have systematic controls of minimum age, and five have controls in place but not systematically applied. | All operations to have controls in place and systematically applied against the minimum age policy. | Publish child online protection policy and accompanying guidelines for implementation for operations. |
Conduct Mobile Operator Child Rights Impact Assessments (MO CRIA) and carry out pilots in Rwanda and Tanzania in Q1, and two other African operations by end of 2015. | Pilots completed in Tanzania and Rwanda; no further assessments in any other operation as the tool was only finalised in December 2015. | Finalise MO CRIA tool and for consultation complete assessment in Colombia in Q1 2016. Launch and promote final version of MO CRIA with UNICEF to the mobile operator community. Conduct MO CRIA in three additional operations. |
Organise child online protection (COP) workshops with stakeholders in three Latin American operations. | Delivered four workshops in Latin America and one in Africa. | Organise three multi-stakeholder COP workshops in Latin America and Africa. |

1 Except for TigoLINE, which will be completed in 2016.
**Issue 2: Child protection continued**

### Number of child online protection workshops conducted

<table>
<thead>
<tr>
<th>Country</th>
<th>Date</th>
<th>#Participants</th>
<th>Key stakeholders</th>
<th>Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bolivia</td>
<td>April 2015</td>
<td>100</td>
<td>Vice Minister of Telecommunications, Minister of Justice, Vice Minister of National Security, District Attorney</td>
<td>The workshop brought together key policy makers in the country to develop a national framework for protection of children online.</td>
</tr>
<tr>
<td>Rwanda</td>
<td>July 2015</td>
<td>70</td>
<td>Minister of ICT and Youth, Minister of Gender and Family</td>
<td>Rwanda is creating a national COP plan with the direction of the ITU and participation of the private sector.</td>
</tr>
<tr>
<td>El Salvador</td>
<td>Sept 2015</td>
<td>270</td>
<td>25 children from a partner school, Superintendent of Telecommunications, Public Attorney</td>
<td>All MNOs of El Salvador signed a joint pledge with UNICEF to work together on COP</td>
</tr>
<tr>
<td>Costa Rica</td>
<td>Sept 2015</td>
<td>80</td>
<td>Vice President of Costa Rica, Vice Minister of Telecommunications</td>
<td>National Committee on COP revised their action plan based on workshop feedback and is now supplemented by an additional advisory with private sector participation.</td>
</tr>
</tbody>
</table>

5 Number of child online protection workshops conducted

4 Number of countries where we support a child helpline

**Promoting online safety**

**Paraguay**

In Paraguay, we jointly developed a leaflet on COP for parents with UNICEF and distributed 30,000 copies through our customer service centers.

**Bolivia**

In Bolivia, we developed Convivencia sin Violencia (Living without Violence) – a leading community outreach and awareness campaign that promotes safe and responsible internet use – in partnership with EPM Foundation in Colombia. The programme aims to build awareness among our customers, children, young adults, teachers and parents about privacy protection, cyberbullying and using the internet safely.

**Joining forces and sharing best practice**

In 2015 our application to the GSMA Mobile Alliance Against Child Sexual Abuse Content was accepted and we also joined ITU Child Online Protection initiative. As part of our MDG with UNICEF to promote child rights in business, we spoke about our approach at five UNICEF Business Network meetings in UK, Sweden, Germany, Italy and Costa Rica, as well as at UNICEF’s regional meetings in Panama and Kenya. Our approach to child protection was also presented as best practice at the Global Child Forum in South Africa in September. We were also invited to present our work on child protection at the ITU World Summit on Information Society in Geneva in May.

**Promoting child helplines**

As part of our commitment to support GSMA’s partnership with Child Helpline International, we continued to provide free calls and promote helplines where children can call for support and to report abuse in a number of our operations, including Paraguay, DRC, Rwanda and Tanzania. In DRC, for example, we promoted the 117 helpline operated by War Child through a communications campaign, sending out over 1.3 million SMSs in French and Swahili to mark the International Day of the African child and raise awareness of the helpline. We continue to look for partnership opportunities in our markets, for example recently in Colombia, that raise awareness of helplines and allow free access to them.

Panelists at COP workshop in Costa Rica, including in the middle, Mr. Marcelo Jenkins, Minister of ICT of Costa Rica.
Why is this important to us?
Acting responsibly and conducting our business to high ethical standards is part of who we are. It is important that our customers can trust us to provide quality products and services, and that governments and investors trust us to operate responsibly.

Building and maintaining trust demands that we set and adhere to high ethical standards, review our governance structures regularly and are diligent about ensuring compliance with laws, regulations and policies. It also means we have processes in place to identify and deal with possible problems promptly and communicate about them transparently.

According to Transparency International's Corruption Perceptions Index, the majority of the markets where we do business have a high corruption risk. It is therefore all the more essential that the Company compliance programme remains robust and is effectively designed to manage compliance-related risks.

Approach and ambition
Millicom has a zero-tolerance policy towards any and all forms of bribery, corruption, extortion and fraud. While our operating environments may be challenging, we are committed to doing business the right way and promoting a culture of transparency and ethical behaviour amongst our employees and when interacting with third parties.

To help us achieve this, our priorities in 2015 have been to establish more robust, group-wide compliance mechanisms to prevent, identify and correct any unethical behaviour. We have also promoted our independently-run whistleblowing channel – Millicom Ethics Line – to ensure our employees are aware of the channels and process of how to raise compliance issues. As our Mobile Financial Services business continues to grow, we continue to also strengthen our Anti-Money Laundering (AML) framework.

Our long-term goal is to create a culture where all employees feel able to speak up and report incidents of non-compliance.

Progress in 2015
A global framework to prevent unethical behaviour
We established a consistent company-wide framework for managing compliance at Millicom, with clear roles and responsibilities, and started rolling out a global, standardized training programme to ensure all employees are aware of Millicom’s expectations and feel comfortable in raising concerns.

Our Anti-Bribery and Anti-Corruption (ABAC) policy, Code of Conduct (‘Code’) and other related policies are publicly available on our website.

Strengthened our global policy framework
• We launched our global Anti-Bribery and Anti-Corruption (ABAC) policy, which was approved by our Executive Committee and rolled out training alongside.
• We published the revised company-wide Code of Conduct, covering a wider range of issues relevant to our new strategy and identifying the guiding standards our company aligns with. All employees must read and acknowledge and complete training on the Code.
• We re-issued the AntiTrust Manual as a refresher to all corporate and country senior management teams to strengthen their and their employees’ understanding of antitrust laws and Millicom’s policy. The Manual outlines obligations for all employees to fulfill the Company’s commitment to comply with antitrust law, and where to report or raise concerns, including the independent, confidential whistleblowing channel Millicom Ethics Line.
• We rolled out the global AML policy effective April 1, 2015 to those markets where we offer Mobile Financial Services (MFS); supported by a communication campaign and training.
• We launched our Fraud Policy, Fraud Response Standard and Fraud Investigation Standard, setting a strong foundation for a consistent, global approach to fraud risk management.
• We provided further guidance to our employees and, where needed, to our suppliers, on our Gifts & Entertainment Policy. The policy sets rules and guidelines.

Our performance against targets
2015 Targets Status Progress 2016 Targets
Launch the new Code of Conduct (‘the Code’). Rebranded version launched internally and available publicly in our three operational languages. All employees have signed or acknowledged the new Code.

Design and launch training on the Code for all employees in collaboration with the Millicom University. Face to face training delivered to senior managers and high-risk functions in all countries, with 78% coverage. English version of the training for employees at all levels available on Millicom University.

85% employees have completed the Code e-learning. AML training completed by all senior staff and high-risk groups.

Continue to align management of cases reported to joint tools and guidelines. For number of cases reported, investigated, and outcomes, please see page 25.

Continue to align management of cases reported to joint tools and guidelines. Continue communication campaign on our Millicom Ethics Line and wider ABAC compliance programme, and encourage employees to raise potential concerns.

New target: Strengthen AML requirements in our Internal Control Manual, and conduct AML audits.

New target: Map our land rights management processes with a pilot operation to understand environmental and social impacts (including corruption risk).

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2015 Targets Status Progress 2016 Targets
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New target: Map our land rights management processes with a pilot operation to understand environmental and social impacts (including corruption risk).

Percentage of employees who have completed the conflict of interest form
57%

Percentage of senior managers who have signed the Code of Conduct
59%

Percentage of employees who have signed the Code of Conduct
52%
Issue 3: Acting responsibly: anti-corruption compliance continued

The Anti-Bribery and Anti-Corruption in-depth training was primarily targeted at employees who, through the course of their daily work, are in contact with third parties such as public officials and other authority figures and major suppliers. The target group broadly falls into two categories: global and country leadership teams due to the nature of their level of authority to make decisions on behalf of the Company; and higher-risk roles identified by the level of third party interaction they are engaged in and exposed to, such as Government Relations, HR, and Procurement.

91% of target group completed the ABAC training

76% of target group who completed the ABAC training

maximum value of gifts or entertainment that can be offered or received, as well as specifying what to do if limits are breached. In one case, this policy was communicated to a major supplier of Millicom by our senior management team to reinforce our approach.

Created a global training programme

• We identified business areas and processes where the risk of corruption or fraud may be higher. Business functions responsible for these processes were the priority target audience for our global ABAC training programme. These functions included procurement, corporate affairs, compliance, HR and commercial teams.
• We developed and delivered a standardised compliance training programme on our ABAC policy, and Millicom Ethics Line for senior managers and high-risk business functions, with 76% attendance. The programme was aimed at raising awareness of when, how and where corruption or bribery-related risks manifest themselves, how to report suspected incidents, and related key policies on managing risk areas such as gifts and entertainment. Additionally, our procurement teams in Guatemala received FOI-specific training by the American Chamber of Commerce.
• We delivered training to meet the requirements of our global AML policy to global, regional and local senior staff within our MFS unit, and specific AML in-depth training to designated Local AML Officers (LAMLOs) with a 91% attendance rate. We have also provided templates to assist in local training.
• We launched a mandatory Code of Conduct e-learning module in Q4 2015, first in English-speaking African countries, with rest of the operations and global offices to follow in Q1 2016.

Established governance structure and controls

• Our new Corporate Compliance Committee (CCC), comprised of all Executive Committee members and our Global Compliance Officer, meets monthly to allow timely and regular review of compliance risks and monitoring of the maturity of the overall Risk and Compliance Framework. The CCC provides a forum to ensure prompt decisions and actions on agreed risk and assurance topics.
• Our country operations also have established a Local Compliance Committee working in a similar capacity.
• We have already embedded AML-related requirements in our Internal Controls Manual and self-assessment campaigns, and we are in the process of incorporating specific AML reviews as part of our Internal Audit function.
• We are now a corporate member of the Association of Certified Fraud Examiners, with a representative member in each operation, and aim to have one certified fraud examiner in each operation by end of the second quarter of 2016.

Measures to detect and correct unethical behaviour

During 2015, we recorded 156 reports of alleged unethical behaviour on our new case management tool, which were reported either through our whistleblowing channel, Millicom Ethics Line, or traditional channels such as reporting to HR, line manager or compliance team.

Potential incident in Guatemala

Our commitment to conduct our business ethically and openly led to our decision to voluntarily report to the authorities potential improper payments made on behalf of our joint-venture operations in Guatemala in the third quarter of 2015. We are co-operating fully with investigations and are dedicated to ensuring that we receive the matter both swiftly and appropriately. We have reviewed and assessed our strategic options, and commissioned an external review of our compliance programme, to strengthen our existing practices – though we are encouraged by the fact that the processes we had in place facilitated timely awareness of a potential issue.

Spotlight

The new Board committee

The Compliance and Business Conduct Committee of the Board was established in November 2015 as part of the Board’s commitment to strengthen oversight over compliance-related activities. It oversees and makes recommendations to the Board regarding the Group’s compliance programme and standards of business conduct. The Committee will meet on a quarterly basis. Read more on the governance section of our Annual Report.

Overview of cases reported to Millicom Ethics Line

<table>
<thead>
<tr>
<th>Topic</th>
<th>Number of cases reported</th>
<th>Cases investigated</th>
<th>Cases ending in written warning</th>
<th>Cases resulting in termination</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bribery and corruption</td>
<td>33</td>
<td>33</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>Discrimination and harassment</td>
<td>36</td>
<td>36</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>Human rights and labour</td>
<td>11</td>
<td>11</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Conflict of interest</td>
<td>19</td>
<td>19</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Fraud</td>
<td>11</td>
<td>11</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>Other</td>
<td>46</td>
<td>46</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>156</td>
<td>156</td>
<td>16</td>
<td>6</td>
</tr>
</tbody>
</table>

Spotlight

1 For 2015 training, we invited higher risk roles in the procurement team, such as head of department in each country, and high-spend category buyers.
In progress

Overview | Strategy | Performance | Assurance

26 Millicom Corporate Responsibility Report 2015

Issue 4: Reducing our environmental footprint

Why is this important to us?
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 also experience some geographical challenges in reducing our carbon footprint. In most of our African operations grid electricity availability is limited or unreliable. This means we have to often run our network using diesel, which significantly increases our carbon footprint. The total electricity and fuel cost to run our networks is around 25% of our overall site management and maintenance costs – so reducing our energy consumption also provides an opportunity to reduce our own costs.

Some of the countries where we operate are highly vulnerable to extreme climate events and natural hazards. We consider climate-related risks and opportunities as part of our business strategy, network expansion (e.g. placing new masts), and managing business continuity.

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Top stakeholder concerns on this issue
The top three initiatives our stakeholders said we should prioritise were:
1. Responsible management of e-waste.
2. Expanding carbon emissions reporting across our supply chain.
3. Reducing energy consumption and rolling out our global e-waste management programme.

Approach and ambition
We continue to focus our efforts primarily on those activities that have the highest environmental impact, in particular reducing our energy consumption and rolling out our global e-waste management programme.

Our key long-term goals are to reduce our energy consumption by 50% by 2020 compared to 2008 baseline, and to implement our global responsible e-waste recycling programme across all operations by 2018. In pursuit of these goals we will continue to focus on improving the collection and accuracy of environmental data; particularly in these two areas, rolling out our data centre improvement programme and aligning with the industry codes on energy efficiency for data centres, and on improving our operational efficiency. Going forward, this will allow us to build better business cases for renewable energy solutions.

Spotlight
Tigo Paraguay reviews its environmental impact
In a first of its kind project across the Group, we engaged a range of departments including logistics, operations, maintenance and laboratories, with a view to understand environmental impact of each business area and help them manage these impacts in a cost-efficient and more environmentally friendly manner. We are in the process of conducting workshops to understand the challenges and opportunities in energy management, maintenance and responsible disposal of waste and equipment and management of chemicals. We are also supporting each department to measure how much waste they generate, supporting them in improving environmental reporting and impact measurement, and helping implement initiatives. We will set environmental objectives based on the outcomes of the workshops, and help departments monitor progress.

Progress in 2015
Managing e-waste
Responsible e-waste management is becoming an increasingly important issue as we generate waste through upgrading basic 2G networks to data enabled 4G and beyond, and promote new generation devices to our customers. A challenge for us is that there is little local recycling infrastructure in our markets. Our global e-waste management programme supports our operations in managing and disposing of e-waste through responsible selected vendors. It gives us strong financial incentives through re-selling and re-use of equipment.

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E-waste recycled through our responsible waste management programme

<table>
<thead>
<tr>
<th>Country</th>
<th>Quantity of e-waste recycled (t)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Colombia</td>
<td>60</td>
</tr>
<tr>
<td>Costa Rica</td>
<td>10</td>
</tr>
<tr>
<td>El Salvador</td>
<td>34</td>
</tr>
<tr>
<td>Paraguay</td>
<td>40</td>
</tr>
<tr>
<td>Tanzania</td>
<td>35</td>
</tr>
</tbody>
</table>

Focus on data centres

In many of our operations, especially in Africa, our data centres were located in building conversions, often not designed and built to host complex data centres and cooling operations. We have significantly improved safety and security, and power usage effectiveness of these data centres through our global improvement programme by either building new world-class sites or modernising existing facilities. We prioritised the roll-out in Chad, Tanzania, Ghana and Paraguay, with over US$120m invested in the programme in these territories. Highlights of the programme in 2015 are:

- Tigo Chad invested over US$55m in building the country’s first modern data, communications and co-location centre in N’Djamena, which went live in November 2015.
- A new world-class co-location data centre is also under construction in Paraguay, due to go live in April 2016. The new facility will enable Tigo to target Paraguay’s growing demand from businesses under the Tigo Business brand, as well as delivering vital disaster recovery services in line with the government’s Critical Infrastructure Protection. The first data centre in the country to have UPTIME Design Tier 3 Certification will have a guaranteed uptime of 99.862%.
- We are working towards achieving a Silver certification for Certified Energy Efficient Datacentre Award (CEEDA) for Tigo Paraguay and Tigo Tanzania.
- In 2016, we will build a similar modern data centre in Senegal, and a Tier 3 compliant one in Colombia, with plans for improvement in place for other operations.

The new data centres will continue to improve the customer experience and ensure operational stability, as well as being more energy efficient and enabling real-time measurement of energy consumption. We anticipate these new facilities will help us reduce our energy consumption in data centres by around 30%. Moving forward, we will also become a participant of the European Code of Conduct for Data Centres, which will help us improve our understanding of cost-effective and efficient energy management solutions for our data centres, and implement initiatives in line with best practice.

Total change in scope 3 emissions, compared to 2014

9%

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- In 2016, we will build a similar modern data centre in Senegal, and a Tier 3 compliant one in Colombia, with plans for improvement in place for other operations.

58% of our sites have single RAN technology with lower energy consumption

Improving energy efficiency

To reduce our energy consumption we continued to modernise to more energy efficient equipment, increase network sharing, and reduce the use of cooling solutions. We also invested in alternative energy, such as solar power and hybrid battery solutions, for powering sites in remote ‘off grid’ areas.

As we continue to upgrade our network, we will roll out single-RAN technology across our sites – this technology allows mobile operators to reduce energy consumption by an estimated 30% by hosting different nodes such as 2G and 3G in one box. However, we are still working on quantifying and capturing the actual savings of these initiatives. In 2015 we piloted an energy efficiency plan in El Salvador, starting with conducting a full review of energy management across our technical sites, offices and buildings and reviewing energy consumption trends for one office building, data centre, and warehouse. Initial results identified saving opportunities and we also delivered a behaviour-changing campaign for employees. We are now analysing return on investment and payback periods for energy-saving initiatives, and identifying sites that would benefit from efficiency projects. We also began a full environmental impact assessment in Paraguay (see spotlight).

58% of our sites have single RAN technology with lower energy consumption
Promoting diversity

Why is this important to us?
Diversity is above all a business issue. New business models and more fragmented customer segments call for a diverse expertise to stay relevant and innovative. Research has highlighted time and again how more women in senior management positively impacts EBITDA and share price. To add to these drivers, in our markets, female customers represent a big opportunity: there is a gender gap in adoption of the services we sell and women feel underserved by the tech sector, while women increasingly control household spending and key purchasing decisions, and are earning more every year.

While our workforce is ethnically diverse with 81 nationalities, gender balance at senior management level does not reflect the overall female workforce (34%).

Much for the above reasons, there is a strong demand both internally and from stakeholders for better gender balance in senior management.

Approach and ambition
The focus of our diversity programme from the start has been to try to affect the gender balance in senior management and address turnover of female staff under 30. While we have taken steps to address these, we have not been able to relaunch a full diversity programme mostly due to changes in leadership. We have work to be done to improve the Company's gender balance, particularly to reverse the trend on gender balance among senior management in Latin America. Management has excluded the gender diversity programme in the Company’s business priorities for 2016, given its critical impact on business.

Our long-term goal is to build an inclusive company where everyone feels they can contribute their best and where we promote and retain top talent. We believe that a more diverse workforce will help us meet the needs of our globally diverse customer base and to develop better ideas, products and services.

Top stakeholder concerns on this issue

The top three initiatives our stakeholders said we should prioritise were:

1. Equal pay.
2. Eliminating discrimination and sexual harassment.
3. Promoting a career in technology among young girls.

Although we do not specifically focus on this topic, ‘education’ and ‘digital inclusion’ are two strategic themes for our social investment programme. See ‘Issue 8: Social investment’ for examples of our work in these areas on page 44.

Why is this important to us?

Information on page 44.

Progress in 2015
The business case and identifying our key issues
Following the changes in our senior management, we worked with the direction of our CEO to define the objectives and priorities for our gender diversity programme.

To redefine the scope and priorities for our programme, we partnered with Pathbuilders, a consultancy specialising in gender diversity. We commissioned research on the business case for improved gender diversity for our sector, together with a full benchmark of best practices from our competitors and across the sector.

Together with Pathbuilders we also conducted a survey of 50 women across our operations, roles and seniority levels to identify challenges and opportunities that are specific to Millicom. Results of both the research and survey were presented and discussed at an Executive Committee and Latin American senior management workshop in February 2016 facilitated by Pathbuilders. The workshop established a company-wide diversity steering group comprising members of the Executive Committee and senior management group to determine priority actions in the short and longer term. Moving forward, the steering group will receive training on gender diversity, and work towards setting KPIs and long-term goals to achieve a more gender-balanced workforce.

Spotlight
Importance of female role models
Roshi Motman was the first woman to be appointed as the CEO of a telecom company in Ghana when she took the helm at Tigo Ghana in 2014. In the two years she has led Tigo Ghana, she has transformed both the Company's internal culture and business performance, where Tigo Ghana won a number of awards in 2015, including two CSR Telecom Company of the Year awards. Roshi’s exceptional leadership has been recognised also outside the Company. She was ranked number one on Sweden’s Talent Index, a prestigious list of 100 exceptional business leaders across the world. She also received the CEO of the Year award at AfricanCom Awards, and the honorary title of Queen Mother of the development of the Tofo Akyma area in 2015.

I believe collaboration is a powerful tool and that great teamwork achieves results. I always try to inspire my team to do more than they think they’re capable of, by providing an environment of openness, inclusion, equal opportunity and the freedom to experiment and grow. I have a great team and my aim is to inspire them to give our customers a reliable connection to the things that are most important to them. That’s how we win.

Our potential customer base is 50% female; however our employee ratio is 70/30 in favour of men. Until the day we are 50/50 in the Company, I will encourage my managers to choose the woman if there is a choice between two equally competent profiles with the right attitude.

Roshi Motman, Tigo Ghana CEO

Our performance against targets

<table>
<thead>
<tr>
<th>2015 Targets</th>
<th>Status</th>
<th>Progress</th>
<th>2016 Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carry out global benchmark of family-related policies.</td>
<td>Completed for all operations.</td>
<td></td>
<td>Analysis aligning lengths of leaves for maternity and paternity leave across all operations. Promote shortened working week for breastfeeding mothers as well as establishing nursing rooms in 50% of operations.</td>
</tr>
<tr>
<td>Introduce number of measures and indicators to identify local challenges affecting female turnover and gender balance in senior management.</td>
<td></td>
<td></td>
<td>Relaunch gender diversity programme with Group and local senior management teams. Conduct equal pay audit. Based on the results of the Executive-Committee workshop, set long-term goals and KPIs to promote an inclusive workplace.</td>
</tr>
</tbody>
</table>

Our performance against targets

This year we prioritised the following key actions:

- Conduct equal pay audit.
- Relaunch gender diversity programme with Group and local senior management teams.
- Based on the results of the Executive-Committee workshop, set long-term goals and KPIs to promote an inclusive workplace.

Overview
Strategy
Performance
Assurance
Issue 5: Promoting diversity

Promoting equal opportunities

We are proud of what we have achieved in 2015 to increase the number of women in senior management. In our Africa operations, the number of women in senior positions has risen from 7% in 2013 to 26% in 2015. In Latin America we have managed to turn a declining trend to an increase to 27% in 2015 (from 24% in 2014).

In 2015 the proportion of women in our workforce has stayed the same as 2014 at 34%, overall, with the percentage of women in approximately top 600 management roles increasing from 22% to 25%. We are committed to continue this steady progress.

In 2015, we conducted the Great Place to Work (GPTW) survey in all our Latin American markets. Diversity – specifically gender diversity – is one element of the survey where respondents are asked if people are treated fairly regardless of their gender. Although our diversity programme focuses on gender diversity, we measure if employees feel they are treated fairly based on other elements of diversity, such as race and sexual orientation. All our operations score highly on this, with an average score of 88%. Tigo Guatemala, who scored highest in the Trust Index of this survey, also ranks the highest across Tigo operations in the overall impartiality domain too.

With a third of our employees under the age of 30, we have a young employee base, making parental leave a key consideration in supporting equal opportunities for working mothers and fathers. During the year we carried out a full review of our family policies against the legal requirements and best practices of leading companies in each country. The review looked at the length of maternity and paternity leaves and related compensation, breastfeeding protections and flexible working arrangements offered. The review concluded that all operations apply legal minimum requirements for such leaves, and in some countries we have an opportunity to further promote specific legal rights, such as a shortened working week for breastfeeding mothers.

We are now analysing the percentage of our male and female workforce who took their full leave entitlement, as well as return rates from parental leave.

Equal pay for men and women in comparable roles is another priority area, and following a full calibration of job grades and roles, the Board has approved a plan to carry out a company-wide equal pay audit in early 2016 to identify pay gaps by gender for similar roles. The audit will cover base salary, bonus target potential, standard allowances and other incentive pay.

Spotlight: Tigo DRC Women’s mentoring network

Under the auspices of its Tigo Women platform, Tigo DRC launched a mentoring framework in 2015 as part of its commitment to promoting diversity and increasing the visibility and representation of women within the Company. With the opportunity to learn from the experience and expertise of women in senior management roles, the programme also aims to enable more women to achieve promotion to senior positions.

The launch event, led by Tigo DRC General Manager Uche Odiolele, was attended by Lucie Kipke, DRC’s Minister of Women, Families and Children, who took the opportunity to share her experience and knowledge with participants.

Spotlight: Supporting breastfeeding employees

Average length of maternity leave in our operating companies is three months. At the same time we can strongly encourage, to exclusively breastfeed their babies by the local health authorities. The pressure and the logistics required can be a significant source of stress to our employees returning from leave or may lead to some employees to step out of the workforce. All of our operations offer a shortened working day for mothers who want to continue breastfeeding their babies, at least until the child is six months old. To facilitate combining breastfeeding and returning to work, three of our operations (Bolivia, Paraguay and El Salvador) have introduced breastfeeding rooms, with 13 rooms inaugurated in 2015. The rooms provide a safe and quiet place to nurse babies or express and store milk. We also have eight nurseries across our business in Bolivia.

Spotlight: Tigo diversity committees

Tigo Ghana and Tigo Costa Rica have set up cross-departmental diversity committees, aimed at addressing factors of difference in order to attract and retain top talent, increase productivity and strengthen customer focus. Through reinforcing the barriers that stand in the way of full participation, the committees aim to help the operations to fully utilise the potential contributions of all employees and to unleash the creativity that comes from different ideas and experiences.
Our performance against targets

<table>
<thead>
<tr>
<th>2015 Targets</th>
<th>Status</th>
<th>Progress</th>
<th>2016 Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>All operations in line with OHSAS 18001 by end of 2015.</td>
<td>Launched revised H&amp;S policy, aligned with OHSAS 18001.</td>
<td>Conduct internal reviews of compliance with the new H&amp;S policy and Millicom Safety Rules.</td>
<td></td>
</tr>
<tr>
<td>Give all staff access to incident reporting tool.</td>
<td>All staff now have access to our incident reporting tool. For a detailed breakdown of incidents reported in 2015, see page 32.</td>
<td>Continue improving our incident reporting.</td>
<td></td>
</tr>
<tr>
<td>New targets: Define the Millicom DNA and deliver diversity, cultural change, and compliance programmes. Implement the new performance management system.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Progress in 2015

#### Our employee profile

We have 15,956 employees, of whom 13,351 work in Latin America and over 4,700 in Colombia. 97% of our employees are of local nationality of the country they’re employed in. We are proud of our highly ethnically diverse workforce which comprises more than 81 nationalities. Our employee base is also young, with 31% of our employees under 30.

#### New hires vs. turnover

<table>
<thead>
<tr>
<th>Gender</th>
<th>Turnover %</th>
<th>Number of leavers</th>
<th>Number of new hires</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female</td>
<td>Male</td>
<td>Female</td>
<td>Male</td>
</tr>
<tr>
<td>Latin America</td>
<td>17</td>
<td>15</td>
<td>711</td>
</tr>
<tr>
<td>Africa</td>
<td>15</td>
<td>30</td>
<td>85</td>
</tr>
<tr>
<td>Millicom Group</td>
<td>18</td>
<td>18</td>
<td>849</td>
</tr>
</tbody>
</table>

### Why is this important to us?

As we build a Digital Lifestyle for our 63 million customers, it is essential that we attract and retain top talent with the right skills set to continue, innovate and deliver an exceptional customer experience.

The health and safety of our people is of paramount importance, given some aspects of our work – such as driving and working at height – involves high risks. We work in some challenging markets where safety standards are often below what we would expect in more developed countries. Some of our markets also have an increasing rate of violent crime, extreme weather or threat of terrorism, where we need to be particularly vigilant to mitigate these risks.

#### Top stakeholder concerns on this issue

The top three initiatives our stakeholders said we should prioritise were:

- Right to join trade unions and freedom of association. See Respecting our employees’ right to collective bargaining on page 38.
- Living wage. See Performance Management and Promoting equal opportunities for performance-based and other non-cash benefits we offer on page 37.

#### Approach and ambition

One of the four pillars of our business strategy is to invest in our people and build on our unique culture. As we celebrated our 25th anniversary in 2015, our CEO reinforced his commitment to strengthening talent and keeping our employees safe. We updated and relaunched our health & safety policy, personally championed by our CEO. Our incident reporting tool is now widely used by all operations. Over the longer term, our most important health and safety goal is to achieve zero fatalities.

We are also committed to nurturing local talent in our markets through mentoring programmes and individual development plans. We aim to be the employer of choice in our markets: an organisation that fosters inclusion and local talent, and one that our people feel proud to work for. The Millicom DNA will have our diversity, cultural change, and compliance programmes at its core, with the Great Place to Work© survey benchmarking our success across operations.

### Issues

**Issue 6: Taking care of our people**

- **Why is this important to us?**
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- **Approach and ambition**
  - One of the four pillars of our business strategy is to invest in our people and build on our unique culture. As we celebrated our 25th anniversary in 2015, our CEO reinforced his commitment to strengthening talent and keeping our employees safe.

- **Our people by age and gender**
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- **New hires vs. turnover**
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### Issue 6: Taking care of our people

**Spotlight**

**Significant changes to our business**

In Africa we carried out and mostly completed the outsourcing of our network maintenance in 2014. The last operation moved to the outsourced provider in May 2015. This transition to managed services manages one that is taking place across our industry. The main driver for us was to increase the quality of service by leveraging the expertise of a global supplier.

In all countries, the managed services provider was contractually tied to take over all our staff with equal or better conditions and with a 12-month job guarantee.

In December 2015, we carried out a restructuring in our Rwanda business, which resulted in 26 redundancies. Tigo Rwanda’s CEO, Tonga Maramba, said the move was intended to modernise the Company stronger at a time when the sector is experiencing new developments in customer needs and technology evolution, and companies need to be dynamic to stay relevant in a fast-evolving market.

**H&S: keeping our people safe**

Although we continued to strengthen our health and safety management framework, 2015 has been a challenging year. We regret to report one staff fatality and 16 contractor fatalities in 2015, the main causes of which were personal safety, travel safety, road safety, and work at heights. Five of the contractor fatalities were in El Salvador and were related to the increased violence there. In response we reviewed our overall personal safety and security risks and security training and plans to implement stronger awareness training and plans to implement stronger awareness training.

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**Outsourced workforce**

<table>
<thead>
<tr>
<th>Year</th>
<th>Employees</th>
<th>Outsourced</th>
<th>Trend of total workforce</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013</td>
<td>0</td>
<td>11,321</td>
<td>11,321</td>
</tr>
<tr>
<td>2014</td>
<td>8,588</td>
<td>14,133</td>
<td>1,26</td>
</tr>
<tr>
<td>2015</td>
<td>8,588</td>
<td>14,133</td>
<td>1,26</td>
</tr>
</tbody>
</table>

To establish a stronger tone at the top, our Group Health & Safety policy now includes a personal statement of intent from our CEO, and has been reviewed and signed off by the Executive Committee. The policy clarifies the roles and responsibilities of both senior management and all employees in ensuring a safe environment.

The policy also reinstates the requirement to report all incidents via our online incident management reporting tool. We are pleased to report a substantial improvement in reporting and record keeping of incidents as a result. From 2016, our global health and safety team will report directly to the Executive Committee on the implementation of the policy.

On country level, all operations were set key tasks and action plans to address significant areas of H&S risk including the identification, revision and control of the top five risks per country, controlling contractors’ managed service providers, management of road risk and working at height as well as fire safety management. We delivered an extensive IOSH ‘managing safety’ programme across our operations, with approximately 80 certificates awarded to H&S committee members, and 60 HSE Officers and other key staff in safety representative roles completing the NEBOSH International General Safety Management certificate.

We also worked closely with those suppliers whose EcoWads assessment scores were not up to required standards, and by the end of 2015 we issued 27 corrective action plans to suppliers on H&S following EcoWads assessments results. For more information on our supply chain engagement, please see page 43.

In addition to our safety programme, we also delivered occupational health campaigns and support for our colleagues. Our annual International Health & Safety Week, run for the fourth year in 2015 to celebrate ISO’s Labour and Safety Day, proved to be bigger and better than the previous years. All operations including corporate offices took part in a series of events over the course of a week where we conducted a variety of support and awareness activities. These included wellbeing sessions, dental reviews, health checks, blood donations, sports and general awareness programmes including malaria across Africa, and dengue fever and Zika virus across Latin America.

**Security**

The security situation in some of the countries where we operate has the potential to disrupt our business operations. El Salvador and Chad were challenging markets in this respect during 2015, where we delivered a number of personal safety awareness sessions and other measures to mitigate the risk.

**Addressing personal safety and security risks**

We have adopted a systematic approach to managing security and safety risks in markets with higher risk of violent crime. In Chad we completed a full risk review including an assessment of personal safety risks from civil strife and terrorism threats. We then established a series of control measures based on international best practices and replicated the model we have used successfully in Tanzania where all support services work together to mitigate business, safety, and security risks.

In El Salvador, we reviewed our need to upgrade our security protocols because of increased gang violence, the country now endures more homicides than any other country in the world.

Adopting a similar holistic risk management approach in El Salvador as in our operation in Chad, the review has led to:

- Upgrading of our risk mapping of city and country areas and restricting movement to known violent areas.
- Close liaison and co-operation with the police and other industry organisations
- Stronger background checks
- Better information and training for all staff including awareness videos about security
- Daily risk summary briefings for sales and engineering teams
- The use of advanced digital personal security tracking and alarms linked to the security control centre and response teams.

In both Chad and El Salvador, we will review the progress of the revised control measures during 2016 and make further improvements needed to protect our staff and contractors.

**Developing our employees**

As our company grows and we develop new products and services, it becomes even more important to understand the skill set we already have in place and map new skills we might need to build and maintain Digital Lifestyle.

Across our Latin America operations, we conducted a talent mapping process for around 1,200 managers and developed personal development and succession plans. We delivered digital leadership and Digital Lifestyle training to all senior management in collaboration with INCAE, the leading business school in Latin America to help us have a common language and set of tools across the business. We also run a future leaders’ development programme with INCAE, which is a two-week business management programme, targeted at our top talent in middle management.

In our African operations, we invited all staff to career counselling sessions where we assessed strengths and development needs and put together individual development plans. Around 150 individuals in each country participated, around half of whom were women. We also engaged with some of the top business schools to attract African talent into our organisation.

**Performance management and reward**

As part of our commitment to investing in our people and attracting and retaining talent, it is important to have a robust performance management system where our employees can contribute to the business success and feel rewarded for their hard work. All employees have annual performance reviews, which are reviewed together by employee and manager mid-year and at the end of each year. Employees receive bonuses based on both their individual performance grading and company performance criteria. The bonus system is the same for all employees, regardless of seniority.

**Listening to our people**

Employee satisfaction and what they think of how the business is run and where we need to improve are valuable information we need to understand and act on.

In Latin America, we conducted the Great Place to Work® survey in all our operations – for the first time in three of them. The survey enables us to compare responses from our employees with those of other major companies in that country, and also across our operations. Six out of seven of our Latin American operations surveyed scored over 70 in the Great Place to Work® Trust Index®, with Tigo Guatemala leading at 84 points and a 7% increase from its 2014 score. Three out of four countries improved their score, with Tigo Bolivia ranked as the second best in Bolivia, and Tigo Paraguay ranked fourth in Paraguay on Great Place to Work® “Empresas con mejor clima laboral” (“Best working environment”). Each operation has prepared a country and business area plan, linked to their culture change plans, to improve employee satisfaction scores.

We also conducted a cultural baseline survey to help us develop a culture change action plan in each
We conducted a Great Place to Work® survey in all our Latin America operations, for the first time in some, this year. Three out of six of our Africa operations conduct pulse surveys.

85% of our senior managers are recruited locally

Corporate income tax paid by region

<table>
<thead>
<tr>
<th>Year</th>
<th>Latin America ($m)</th>
<th>Africa ($m)</th>
<th>Unallocated items ($m)</th>
<th>Total continuing operations ($m)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>187</td>
<td>7</td>
<td>44</td>
<td>251</td>
</tr>
<tr>
<td>2014</td>
<td>192</td>
<td>25</td>
<td>60</td>
<td>317</td>
</tr>
<tr>
<td>2013</td>
<td>261</td>
<td>21</td>
<td>60</td>
<td>322</td>
</tr>
</tbody>
</table>

* Total tax paid by the Group in 2015.
Why is this important to us?

We work with just under 10,000 suppliers around the world, ranging from small local vendors to large multinationals. How our suppliers behave reflects on us and our reputation.

Ensuring that our suppliers adhere to similar high standards of ethical behaviour as our business helps us mitigate risks to our own operations, supports our ambition to build sustainable long-term partnerships with our suppliers and protects our reputation. Monitoring of the ethical performance of suppliers is an issue that our investors support our ambition to build risk mitigation to our own operations, behaviours as our business helps us to similar high standards of ethical ensuring that our suppliers adhere to and our reputation.

Our performance against targets

<table>
<thead>
<tr>
<th>2015 Targets</th>
<th>Status</th>
<th>Progress</th>
<th>2016 Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Define ‘high risk’ suppliers.</td>
<td>High-risk supplier categories defined, and commenced supplier risk materiality analysis with BSR</td>
<td>Complete supplier risk materiality analysis and identify top risks per spend category</td>
<td></td>
</tr>
<tr>
<td>Begin supplier self-assessments through EcoVadis supplier self-assessment tool, focusing on global top 20 suppliers by risk.</td>
<td>Supplier self-assessments sent to 62 suppliers of highest risk areas, with 74% completion rate. Second campaign targeted 50 more suppliers. We also completed the assessment for our own business practices, to benchmark ourselves against our suppliers.</td>
<td>Conduct at least two self-assessment campaigns, based on materiality assessment.</td>
<td></td>
</tr>
<tr>
<td>Provide training to all internal procurement teams, and to top buyers internally on Supplier Code and monitoring.</td>
<td>Training provided by EcoVadis to internal procurement teams, top buyers, and CR managers, with 65% attendance rate.</td>
<td>Provide training to procurement staff on implementing and following corrective action plans. Begin supplier training programs and capacity building.</td>
<td></td>
</tr>
</tbody>
</table>

Progress in 2015

Raising standards in our supply chain

To advance our understanding and management of sustainability risks in our supply chain, in 2015 we appointed EcoVadis – a collaborative platform that provides supplier sustainability ratings for global supply chains – to help us monitor our suppliers and implement corrective action plans where needed. Together we ran two supply chain self-assessment campaigns, starting with existing high-value suppliers who provide products or services in categories defined as posing a high level of corporate responsibility risk.

We had an excellent 74% response rate from the first 62 companies we invited to self-assess. The 46 suppliers who responded to the first campaign represent 53% of our supplier spend. Their average score was 46/100, which is slightly above EcoVadis’ average of 42/100.

From the respondents, 17 fell below our threshold assessment score of 35/100. We contacted each supplier individually with our concerns and highlighted specific areas where we expect to see improvements within one year. Formal corrective action plans have been set for these suppliers using the EcoVadis platform. The plans are based on what is material to the sector and geography the supplier operates in, based on materiality guidance in the EcoVadis methodology. Breakdown of the corrective actions requested by type can be found on page 43. These 17 suppliers will be requested to re-do the self-assessment in one year’s time. Those providing services with high health and safety risk, we are aiming to also conduct on-site audits already in 2016.

Based on our initial assessments and results of the EcoVadis surveys, the priority risk areas where we requested corrective actions related to health and safety in network and cable deployment and maintenance, labour conditions in manufacturing, and privacy and data protection related to customer service/IT solutions. It is also clear from the assessments that suppliers with poorer performance in general lack a systematic approach to managing CR-related risks. To help us prioritize further assessments, audits, risks and opportunities, we commissioned a detailed supply chain risk materiality analysis with Business for Social Responsibility (BSR), to be completed by the end of the first quarter of 2016.

We invited a second batch of 50 suppliers to complete self-assessment by end of January 2016, and expect to carry out at least two further campaigns in 2016. These will be targeted to high spend suppliers who did not complete an assessment in the first two campaigns as well suppliers representing categories with most material CR-related risks (based on BSR assessment). We are likely to complement this with campaigns for specific countries. We will continue to use EcoVadis for some larger tenders, after successfully trialing it for a call centres tender in Africa in 2015.

We had an excellent 76% response rate from the first set of suppliers we invited to complete a self-assessment of their sustainability practices on EcoVadis.

Suppliers who responded represent 53% of our supplier spend.

10 Based on 2014 spend. Additionally, three suppliers assessed were part of a tender, so do not account for overall spend data.
Training
In line with our five-year plan for responsible supply chain, we began with training programmes for internal procurement staff on responsible supply chain management (see also specific anti-corruption training for procurement staff on page 24). All buyers were trained on the EcoVadis tool and assessment process in 2015, and 65% of global and local buyers participated in training on responsible supply chain management and how to communicate with suppliers on sustainability in 2015. In 2016, the same teams will receive further training on EcoVadis tool, specifically on how to analyse supplier scorecards and create and follow up corrective action plans.

Ahead of our five-year plan, we also began training of suppliers in CR in selected countries. In Paraguay we began a trial of a supplier capacity building programme with eight key SME suppliers who will receive in-depth training on ethical business conduct, labour conditions, environmental management and customer management. In El Salvador we partnered with a local CR organisation, FUNDEMAS on supplier training (see spotlight on the right).

Spotlight
Workshop in El Salvador
In 2015 we conducted our first two-day workshop in El Salvador that focused specifically on social responsibility in partnership with Fundemas (Business Foundation for Social Action) and Tigo Development Centre. The event was offered free of charge for our ten major suppliers. During the workshop, we briefed our suppliers on our values, CR policies and how our suppliers can best align with our approach and expectations.

Policies supporting our responsible supply chain management programme
All our supplier contracts include a requirement to comply with our Supplier Code of Conduct, which is now included in all our agreements as a mandatory annex. It covers ethics and integrity, workers’ rights and protection, prohibition of child labour and environmental protection.

Supplier self-assessment in EcoVadis
As of 31 December 2015

| Total number of suppliers invited to complete first round self-assessment | 62 |
| Total number of suppliers who completed the first round self-assessment | 46 |
| Total number of suppliers that do not fulfil our requirements | 17 (27%) |
| Number of corrective actions requested from suppliers that do not fulfil our requirements | 120 |

Number of corrective action plans requested by category

<table>
<thead>
<tr>
<th>Environmental</th>
<th>Labour rights</th>
<th>Fair business practices</th>
<th>Sustainable procurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
<td>50</td>
<td>25</td>
<td>30</td>
</tr>
</tbody>
</table>

Overview | Strategy | Performance | Assurance
Overview | Strategy | Performance | Assurance

Why is this important to us?

There are many pressing needs in the markets where we operate, and it is important that as a company with a significant market presence we participate in solving them. Social investment, particularly where we can support through the use of our core products, is at the very heart of our business mission of empowering people to advance in life and find joy.

Approach and ambition

Our priority is to align our social investment strategy closely with our core business mission – by expanding the Digital Lifestyle to our communities, to create an emotional connection with our customers and stakeholders, and to support our brand story of a trusted and socially responsible brand. Digitalisation is a great lever for social advancement and at the core of our social investment approach. There are four themes around which we will target the majority of our social investment from 2016:

- Digital inclusion: making technology more accessible for ‘unconnected’ or ‘underprivileged’ groups;
- Education: providing access to education and supporting improvements in schools;
- Health: delivering health awareness programmes or improving access to affordable healthcare using our products and services;
- Entrepreneurship and financial inclusion: empowering entrepreneurs through technology and enabling access to financial products or services.

Our overall aim is to be a reliable and sustainable partner to our social investment stakeholders and to measure the social impact we are able to achieve with them.

Progress in 2015

Supporting local solutions to local challenges

During 2015 we reviewed our social investment project portfolio to deliver a more targeted approach. A review of over 100 current local initiatives identified the four themes: digital inclusion, education, health, and entrepreneurship and financial inclusion. These themes are the most relevant ones to our stakeholders, and each country has the flexibility to focus on the areas to meet the needs of their local stakeholders.

Towards the end of 2015, we further localised our social investment strategy for our African operations. In the refined strategy the local companies will run joint social investment projects to deliver a more targeted approach.

This localised approach was also the key consideration for dissolving the Millicom Foundation as a global umbrella organisation for our social investments. Millicom’s contribution to the global social investment programme in six countries in Africa; and similar programmes in four countries in Latin America.

Spotlight

Digital Changemakers Award

The Tigo Digital Changemakers Award supports social entrepreneurs who use digital tools to solve societal challenges. Winners receive professional coaching and mentoring to help them develop their initiatives, in addition to cash awards. Run jointly with our non-profit partner Reach for Change across all operations in Africa, we attracted 1,333 applications in 2015. We also run a similar awards programme for four of our Latin American operations: Bolivia, Costa Rica, Honduras and Paraguay.
Highlights in social investment in 2015

Ghana

Adequate school facilities are missing in many of our markets, where children study under trees, without desks or in run-down and often unsafe school buildings. During the year Tigo Ghana launched a ‘Shelter for Education’ campaign which focused on building or renovating schools in six deprived communities in the country. More than 10 million viewers watched the six documentary episodes featuring Tigo Ghana completely rebuilding schools with fully-furnished, four-classroom blocks, a head teacher’s office, a pantry and toilet facilities in six deprived communities. This benefited over 1,200 teachers and students. After completion of the project, Tigo staff are still actively engaged as volunteer teachers.

El Salvador

Tigo El Salvador has been one of our most active operations in employee engagement. In 2015, they registered 3,308 hours of corporate volunteering. 209 colleagues participated in six different events ranging from reforestation work to building digital classrooms.

Guatemala

Fundacion Tigo Guatemala has been supporting a campaign against paediatric cancer since 2004. Last year alone we sent over 60 million text messages raising awareness and donations towards the cause. Tigo employees are also frequent volunteers in the National Oncology Pediatric Hospital (UNOP). In addition we directly donated funds of over US$300,000. Since the start of the campaign in 2001, the survival rate for paediatric cancer has risen from 20% to 70%.

Paraguay

While many regional hospitals have infrastructure to run electrocardiography and echocardiography tests they are lacking expertise to analyse results and advise patients. In a pilot project, Tigo Paraguay connected 17 regional hospitals to allow them exchange results and receive feedback via the internet from doctors in the national hospital of the capital Asuncion. Following the success of the pilot, the Ministry of Health implemented the system in 200 hospitals on a commercial basis. In the first 14 months, over 90,000 people have directly benefited from the service, and Tigo now provides internet access at cost to these 200 hospitals, which serve over 65% of the Paraguayan population.

Honduras

Tigo Te Connecta in Honduras is one of the many programmes in our operations focusing on opening digital opportunities to young people. As part of this project, we installed 205 broadband connections in schools, enabling over 157,000 students to access the internet, and over 3,700 teachers to use technology in managing secondary education performance. In partnership with the Honduran telecom regulator CONATEL, we are planning to connect a further 100 schools with broadband internet over the next two years.

Tanzania

In 2013, we partnered with UNICEF and the Tanzanian government to launch a mobile birth registration programme to provide free birth certificates to children using our mobile technology. Our partnership has since seen over 80,000 children receive a birth certificate. Building on the success in the two regions we have been running this programme, we will expand our commitment to two additional regions per year until 2019. With UNICEF, we are also piloting a mobile testing scheme for children of HIV positive mothers, supporting their local innovation hub, and the child helpline.

Rwanda

In 2015, Tigo Rwanda became our first operation to create a Digital Changemakers Hub for the social enterprises we support at our Kigali headquarters, providing a space where Digital Changemakers can work on their projects without distraction, with a reliable internet connection and with access to experts from both Tigo and our partner Reach for Change.

Senegal

Our 2015 Digital Changemakers Award Winners in Senegal were Jean Luc Seneadio and Evelyne Ines, who developed a web and mobile application platform to promote blood donation by registering blood donors and encouraging them to donate. They have now partnered with 19 blood banks in Senegal and plan to scale up using SMS as a platform to touch out their initiative across the country.

Chad

Our 2014 Digital Changemaker Award winner Delph Mbaya developed a mobile device to provide affordable and convenient testing and treatment for children in remote areas infected with bilharzia. During 2015, he tested 10,671 children, diagnosing 419 with bilharzia and delivering treatment to them. He has partnered with Tigo to provide these toll-free hotlines that the public can use to access information and request test collection at home. He is now scaling his impact with three mobile labs and ten mobile units.

Colombia

A mix of professional teachers and TigoLine volunteers certified over 2,500 people after an introductory course in the use of computers. In the two ‘telecentros’ internet spaces in Bogota, where Tigo is targeting groups that are particularly prone to be affected by the digital divide, e.g. elderly people or people with a learning disability and introduce them to the basics of the internet, how to stay safe online and useful tools like Google Hangout or Skype.

El Salvador

We partnered with USAID and connected 146 schools to the internet, reaching over 40,000 students and more than 1,000 teachers. This innovative partnership also enables the students from being just recipients of technology to becoming makers by teaching topics like coding or robotics.

Costa Rica

Six students of the Technological Institute of Costa Rica (TEC) won the Tigo Digital Changemakers Award. Their social company CO2 Tree developed a system for recycling through intelligent stations, which assign loyalty points for recycled waste, such as plastic or glass bottles and aluminium cans. They intend to launch 60 stations in 2016 starting in cooperation with major universities.

Senegal

Our 2015 Digital Changemakers Award Winners in Senegal were Jean Luc Seneadio and Evelyne Ines, who developed a web and mobile application platform to promote blood donation by registering blood donors and encouraging them to donate. They have now partnered with 19 blood banks in Senegal and plan to scale up using SMS as a platform to touch out their initiative across the country.
**Key Performance Indicators**

### Issue 1: Privacy and freedom of expression

#### Long-term objectives (by 2018):
- Complete an external assessment of Millicom’s policies and processes relating to privacy and freedom of expression.

<table>
<thead>
<tr>
<th>Topic</th>
<th>2015 target</th>
<th>Status (where relevant)</th>
<th>Read more about our progress at</th>
<th>KPIs</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy implementation</td>
<td>Action plans for operations that require further support in implementing Law Enforcement Assistance (LEA) guidelines.</td>
<td></td>
<td>Page 15</td>
<td>Number of operations with processes in place aligned to Group Guideline to manage law enforcement requests. New KPI for 2016</td>
<td>Continue to support specific operations to implement guidelines.</td>
<td>Page 16</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Topic 2015 target</td>
<td>Status (where relevant)</td>
<td>Read more about our progress at</td>
<td>KPIs</td>
<td>2013</td>
<td>2014</td>
<td>2015</td>
<td>2016 target</td>
<td></td>
</tr>
<tr>
<td>Law enforcement requests</td>
<td>Template for operations to record requests in a unified manner.</td>
<td></td>
<td>Page 16</td>
<td>Number of law enforcement requests (Group).</td>
<td>N/A</td>
<td>N/A</td>
<td>39%</td>
<td>18%</td>
</tr>
<tr>
<td>Major events related process and guidelines approved for the Group.</td>
<td>Number of major events.</td>
<td>–</td>
<td>2</td>
<td>20</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

1. We published our Millicom Group Guideline for Law Enforcement Assistance (LEA) Requests and Major Events Guideline, and created a global template for each operation to record requests in 2015. Therefore this is the first year we are able to report on the number of LEA requests and major events. The number includes requests for customer information, MFS information and interception in all operations.

### Issue 2: Child protection

#### Long-term objectives (by 2018):
- Conduct Child Rights Impact Assessments in all operations in Africa.
- Integrate the promotion of parental controls and distribution of safe internet into mobile, fixed and cable TV customer processes in Latin America.

<table>
<thead>
<tr>
<th>Topic</th>
<th>2015 target</th>
<th>Status (where relevant)</th>
<th>Read more about our progress at</th>
<th>KPIs</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Child labour policy compliance</td>
<td>Carry out first internal review of child labour and young workers policy compliance in 2015 across all our operations.</td>
<td>Pages 11, 19</td>
<td>Number of operations completing self-assessment against minimum age of hiring controls. N/A</td>
<td>N/A</td>
<td>12%</td>
<td>All operations to have controls in place and systematically applied against the minimum age policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Child rights impact assessments</td>
<td>Conduct Mobile Operator Child Rights Impact Assessments (MO CRIA) in Rwanda and Tanzania in Q1, and two other operations by end of 2015. Finalise the MO CRIA tool in collaboration with UNICEF following the pilots.</td>
<td>Page 19</td>
<td>Number of operations with child risk impact assessment conducted.</td>
<td>1</td>
<td>0</td>
<td>2</td>
<td>Finalise MO CRIA tool and complete assessment in Colombia in Q1 2016. Launch and promote final version of MO CRIA with UNICEF to the mobile operator community. Conduct MO CRIA in three additional operations.</td>
<td></td>
</tr>
</tbody>
</table>

---

1. Our minimum age policy was published in 2015, with internal controls embedded the same year. Therefore we are unable to report any data for 2013 or 2014.

2. Except for TigoTanz, which will be completed in 2016.

### Issue 3: Acting responsibly: anti-corruption compliance

#### Long-term objectives (by 2018):
- Implement all elements of the Millicom Anti-Bribery and Anti-Corruption (ABAC) compliance programme.
- ABAC programme embedded cross-functional risk management, and linked to Group-wide improvement measures to Compliance KPIs on awareness training.

<table>
<thead>
<tr>
<th>Topic</th>
<th>2015 target</th>
<th>Status (where relevant)</th>
<th>Read more about our progress at</th>
<th>KPIs</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Child protection workshops</td>
<td>Organise child online protection (COP) workshops with stakeholders in three Latin American operations.</td>
<td></td>
<td>Page 20</td>
<td>Number of workshops conducted.</td>
<td>–</td>
<td>1</td>
<td>4</td>
<td>(exceeded target)</td>
</tr>
<tr>
<td>Customer COP materials</td>
<td></td>
<td></td>
<td>Page 20</td>
<td>Number of operations with a child online protection portal or COP</td>
<td>N/A</td>
<td>N/A</td>
<td>1</td>
<td>New KPI for 2016</td>
</tr>
</tbody>
</table>

---

3. The Code eLearning was launched at the end of 2015 in English-speaking African markets only.

4. New indicator for 2016. Number of procurement staff trained as a percentage of all supply chain roles, including procurement and logistics. For 2015 training, we invited higher risk roles in procurement team, such as head of department in each country, and high-spend category buyers.

5. In previous years we have been unable to report on the total number of employees trained on ABAC. As we identified potential high corruption risk roles this year and targeted these roles for ABAC training, we feel reporting on a revised indicator is a more accurate reflection of our progress.
Key Performance Indicators continued

Issue 3: Acting responsibly: anti-corruption compliance continued

<table>
<thead>
<tr>
<th>Topic</th>
<th>2015 target</th>
<th>Status (where relevant)</th>
<th>Read more about our progress at</th>
<th>KPIs</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conflict of interest declaration</td>
<td></td>
<td>Page 23</td>
<td>% of employee who have signed the conflict of interest declaration form.</td>
<td></td>
<td>67%</td>
<td>67%</td>
<td>57%</td>
<td>All employees have filled the conflict of interest declaration form.</td>
</tr>
</tbody>
</table>

Whistleblowing

<table>
<thead>
<tr>
<th>Topic</th>
<th>2015 target</th>
<th>Status (where relevant)</th>
<th>Read more about our progress at</th>
<th>KPIs</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continue to align management of cases reported to joint tools and guidelines.</td>
<td></td>
<td>Page 25</td>
<td>Number of cases of unethical behaviour reported.</td>
<td></td>
<td>177</td>
<td>110</td>
<td>156</td>
<td>Continue to align management of cases reported to joint tools and guidelines.</td>
</tr>
<tr>
<td>Number of reported cases investigated.</td>
<td></td>
<td></td>
<td>142</td>
<td>101</td>
<td>156</td>
<td>Continue communication campaign on our Millicom Ethics Line and wider ABAC compliance programme, and encourage employees to raise potential concerns.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Investigations resulting in written warnings.</td>
<td></td>
<td></td>
<td>43</td>
<td>8</td>
<td>16</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Investigations resulting in termination of employee contract.</td>
<td></td>
<td></td>
<td>48</td>
<td>54</td>
<td>6</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Issue 4: Reducing our environmental footprint continued

Long-term objectives (by 2018):

- Global e-waste process implemented in all operations to manage e-waste through responsible vendors.
- Extend environmental reporting to consider emissions relating to logistics and supply chain.

<table>
<thead>
<tr>
<th>Topic</th>
<th>2015 target</th>
<th>Status (where relevant)</th>
<th>Read more about our progress at</th>
<th>KPIs</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>E-waste</td>
<td>Complete e-waste process and sell waste through certified vendors in six operations.</td>
<td>Page 27</td>
<td>Number of operations set up on our global responsible e-waste recycling programme.</td>
<td>1</td>
<td>2</td>
<td>5</td>
<td>Identify high-risk operations where e-waste is not managed in line with Millicom’s global policy, and set up programmes at these operations as priority. Update Millicom’s environment and e-waste management policies.</td>
<td></td>
</tr>
</tbody>
</table>

Issue 5: Promoting diversity

Long-term objectives (by 2018):

- Increase the number of women among senior managers each year.

<table>
<thead>
<tr>
<th>Topic</th>
<th>2015 target</th>
<th>Status (where relevant)</th>
<th>Read more about our progress at</th>
<th>KPIs</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Family-friendly policies</td>
<td>Carry-out global benchmark of family-related policies.</td>
<td>Page 32</td>
<td>Number of operations benchmarked.</td>
<td>N/A</td>
<td>N/A</td>
<td>14</td>
<td>Analyse alignment lengths of leaves for maternity and paternity leave across all operations. Promote shortened working week for breastfeeding mothers as well as establish nursing rooms in 50% of operations.</td>
<td></td>
</tr>
</tbody>
</table>
### Issue 5: Promoting diversity continued

<table>
<thead>
<tr>
<th>Topic</th>
<th>2015 target</th>
<th>Status (where relevant)</th>
<th>Read more about our progress at KPIs</th>
<th>KPIs</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female representation in the workforce</td>
<td>Introduce number of measures and indicators to identify local challenges affecting female turnover and gender balance in senior management.</td>
<td>Pages 31-32 % of women in senior management positions.</td>
<td>% of women in senior management positions.</td>
<td>19%</td>
<td>22%</td>
<td>25%</td>
<td>Relaunch gender diversity programme with group and local senior management teams. Conduct equal pay audit. Based on the results of the Executive Committee workshop, set long-term goals and KPIs to promote an inclusive workplace.</td>
<td></td>
</tr>
<tr>
<td>Turnover rate for women under 30.</td>
<td></td>
<td></td>
<td>13%</td>
<td>28%</td>
<td>18%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Issue 6: Taking care of our people continued

**Long-term objectives (by 2018):**
- Continue our zero-fatality commitment; invest in our people and nurture local talent.

<table>
<thead>
<tr>
<th>Topic</th>
<th>2015 target</th>
<th>Status (where relevant)</th>
<th>Read more about our progress at KPIs</th>
<th>KPIs</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Health and safety</td>
<td>All operations in line with OHSAS 18001 by end of 2015.</td>
<td></td>
<td>Number of operations in line with OHSAS 18001.</td>
<td>N/A</td>
<td>2</td>
<td>14</td>
<td>Conduct internal audits to assess compliance with the new H&amp;S policy and Millicom Safety Rules. Conduct risk assessments with each business area to identify significant risks and develop a mitigation plan for top five risks. Achieve OHSAS 18001 certification for our corporate offices.</td>
<td></td>
</tr>
<tr>
<td>% of workforce represented in H&amp;S committees.</td>
<td></td>
<td></td>
<td>62%</td>
<td>70%</td>
<td>91%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Give all staff access to incident reporting tool.</td>
<td></td>
<td></td>
<td>N/A</td>
<td>N/A</td>
<td>305</td>
<td>Continuous improving our incident reporting.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of H&amp;S incidents reported</td>
<td></td>
<td></td>
<td>N/A</td>
<td>N/A</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of employee fatalities</td>
<td></td>
<td></td>
<td>-</td>
<td>-</td>
<td>6</td>
<td>14a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of contractor fatalities</td>
<td></td>
<td></td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lost-time injury rate per 1,000 employees</td>
<td>N/A</td>
<td>N/A</td>
<td>1.26</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Absentee rate</td>
<td>0.54%</td>
<td>0.62%</td>
<td>0.71%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

8 The increase is partially due to increased violence in El Salvador (five fatalities); and partially due to improved reporting of incidents and fatalities.
9 With the roll out of our H&S incident reporting tool, we are able to report accident rate for the first time in 2015. The number is per 1,000 employees.

10 In 2013 and 2014, we reported the number of employees on a local contract. In 2015, we have started reporting on the percentage of local nationalities instead as it provides a more accurate measure for local employment.
11 Training hours data excludes Tigo Chad and Tigo Senegal, as training wasn’t tracked systematically during 2015.
Key Performance Indicators continued

Issue 7: Responsible supply chain management

Long-term objectives (by 2018):
• Full supplier monitoring programme in place, including, self-assessments and on-site audits.
• Support capacity building of local suppliers to manage CR-related risks.

<table>
<thead>
<tr>
<th>Topic</th>
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<th>Status (where relevant)</th>
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<th>KPIs</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016 target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Responsible supply chain management</td>
<td>Define high-risk suppliers.</td>
<td>Complete supplier risk materiality analysis and identify top risks per spend category.</td>
<td>Page 41</td>
<td>% of strategic suppliers who have signed the Supplier Code of Conduct.</td>
<td>82%</td>
<td>61%</td>
<td>79%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Begin self-assessments through EcoVadis supplier self-assessment tool, focusing on global Top 20 suppliers by risk.</td>
<td>Conduct at least two self-assessment campaigns, based on materiality assessment.</td>
<td>Page 41</td>
<td>Number of suppliers invited to complete self-assessments to date11.</td>
<td>N/A</td>
<td>N/A</td>
<td>113</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Provide training to all internal procurement teams and to top buyers internally on Supplier Code and monitoring.</td>
<td>Provide training to procurement staff on implementing and following corrective action plans on EcoVadis.</td>
<td>Page 42</td>
<td>% of procurement teams trained on responsible supply chain management.</td>
<td>N/A</td>
<td>N/A</td>
<td>65%</td>
<td></td>
</tr>
</tbody>
</table>

11 In 2016, we will work towards aligning our reporting definition of ‘strategic suppliers’ with the results of supplier risk materiality analysis, and report on percentage of high risk suppliers who signed the Supplier Code.
12 Number of suppliers who have been invited to complete self-assessments since beginning of 2015 until end of year 2015.
13 Number of suppliers who have completed self-assessments since beginning of 2015 until end of year 2015.
Scope and approach

The assurance process was conducted in accordance with A10000x4 (2008), using DNV GL’s VeriSustain™ methodology. VeriSustain™ is based on our professional experience, international assurance best practice including AA1000 Assurance Standard, International Standard on Assurance Engagements 3000 (ISAE 3000), and the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines. We evaluated the report for adherence to the VeriSustain™ Principles (the “Principles”) of stakeholder inclusiveness, materiality, responsiveness, completeness, neutrality and reliability.

We evaluated the performance data using the reliability principle together with Millicom’s data protocols for how the data are measured, recorded and reported. The performance data in scope was 2015 data for: EN3 – Energy, EN5, EN16, EN17 – Emissaries, LA1 – Employee numbers; LA5 – Health & Safety committees; LA6 – Injuries – LA9 – Training; LA12 – employee breakdown; PR8 – Complaints; SO4 – Anti-corruption; HR12 – Human Rights grievances.

We understand that the reported financial data and information are based on data from Millicom’s Annual Report and Accounts 2015, which are subject to an independent audit process. The review of financial data taken from the Annual Report and Accounts is not within the scope of our work.

We planned and performed our work to obtain the evidence we considered necessary to provide a basis for our assurance opinion. We are providing Type 1 ‘moderate’ assurance. A ‘high level’ of assurance would have required additional work on a consolidated corporate level and a consolidated site level. We undertook the following activities:

- Review of the current corporate responsibility issues that could affect Millicom and our interest to stakeholders;
- Review of Millicom’s approach to stakeholder engagement and recent outputs;
- Review of information provided to us by Millicom on its reporting and management processes relating to the Principles;
- Interview[s] with selected Directors and senior managers responsible for management of corporate responsibility issues and review of selected evidence to support issues discussed.

We were free to choose interviewees, they included: the CEO, Chair of Government Relations and Corporate Responsibility Committee; Executives with overall responsibility for Millicom’s corporate responsibility strategy and programmes; for Millicom’s operations in Africa and Latin America; and management responsible for specific functions, including supply chain, security and fraud;

- A site visit to the TigoSolutions business in Colombia to review process and systems for preparing site level corporate responsibility data and implementation of corporate responsibility strategy. We were free to choose the site location. Colombia was chosen as it is the biggest market for Millicom outside of Europe;
- Review of supporting evidence for key claims and data in the report. Our checking processes were prioritised according to materiality and we based our prioritisation on the materiality of issues at a consolidated corporate level and;
- Review of the processes for gathering and consolidating the specified performance data and, for a sample, checking the data consolidation.

DNV GL’s assurance engagements are based on the assumption that the data and information provided by the client to us as part of our review have been provided in good faith. DNV GL expressly disclaims any liability or co-responsibility for any decision a person or an entity may make based on this assurance statement.

Basis of our opinion
A multi-disciplinary team of sustainability and assurance specialists performed work at headquarters and site level. We undertook the following activities:

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Opinion
On the basis of the work undertaken, nothing came to our attention to suggest that the Report does not comply with Millicom’s adherence to the Principles. In terms of reliability of the performance data, nothing came to our attention to suggest that these data have not been properly collated from information reported at operational level, nor that the assumptions used were inappropriate.

Observations
Without affecting our assurance opinion we also provide the following observations.

Stakeholder inclusiveness
The participation of stakeholders in developing and achieving an accountable and strategic response to sustainability

Stakeholder engagement at corporate level remains strong. We note that Millicom has implemented our recommendation to increase engagement with local stakeholders and has conducted a materiality survey with stakeholders in each market. The planned country fact sheets or next Corporate Responsibility report should disclose how material issues differ across operating countries and the impact on the global Corporate Responsibility strategy. Millicom should also explore if governance arrangements need to be strengthened at local level and disclose how external stakeholder input is considered by various governance bodies.

Materiality
The process for determining the issues that are most relevant to an organisation and its stakeholders:

This is the second year Millicom is implementing its five year Corporate Responsibility strategy. Significant efforts have been made to further formalise governance arrangements, policies and systems, and many have now been successfully integrated throughout the business. Millicom appears to be a leader in emerging environments and during the year it has faced a high number of contractor fatalities, the discovery potential improper payments in Guatemala and other security risks. Millicom is already strengthening its existing management approaches in these areas and future reports should include the outcomes of this work.

In 2015 Millicom undertook a review of its material issues with stakeholders. This confirmed that the issues currently in scope remain priorities and also identified some emerging issues for future focus such as land acquisitions and management, and climate resilience. We have recommended reporting on responsible marketing in the past and note that Millicom has now made a commitment to work on a global responsible marketing policy in 2016. This year Millicom has further strengthened the management control and oversight of a range of material corporate responsibility issues with the Government Relations and Corporate Responsibility Committee of the Board of Directors now meeting quarterly. The revised company wide Code of Conduct was published and the internal self assessments operations undertaken to include compliance, health and safety and corporate responsibility topics.

Responsiveness
The extent to which an organisation responds to stakeholder issues:

Millicom continues to provide a balanced account of the company’s performance and has improved significantly about the challenges faced throughout the year. This year the report provides a wider overview of key stakeholder feedback and signpost how this is currently managed which is helpful.

Millicom continues to strengthen its management approach and disclosure relating to freedom of expression and privacy by further embedding the cross-functional Lawful Interception Policy Committee and with the introduction of a separate Low Enforcement Disclosure report this year.

Millicom reports its progress against the 2015 targets clearly, and targets which have not been met have been rolled forward and included in the 2016 targets. Longer term targets are also reported and provide context for the annual performance indicators. We support the intention to report more specific environmental targets and KPIs in 2016.

The rollout of the e-waste initiative continues and other environmental initiatives are also underway. While quantification of their impact remains challenging due to data availability across the business we have noted the e-waste initiative has expanded to five operations and the quantity of e-waste recycled is now reported.
Reliability of performance information
The accuracy and comparability of information presented in the report, as well as the quality of underlying data management systems.

On the basis of evidence we evaluated, data review mechanisms at corporate level were found to be robust. Challenges around obtaining accurate country level performance information remain. However, we note that central oversight over data has been strengthened further and that efforts have been undertaken to improve country level data.

At a Group level this has included functional reviews of some indicators, increasing confidence over these data. This year the Corporate Responsibility data reporting tool has been used to collect evidence to support data entered, and for those countries providing this, it has improved the reliability of data. We recommend supporting evidence is provided for all data in future.

At country level, data accuracy is still at times affected by lack of clarity over data definitions and scope. For a small number of country data points, estimates have been used and we believe the basis to be reasonable. Where data is estimated, this is signposted in the report text.

As the maturity of the data collection processes at operational level continues to evolve, we recommend improving the formal review and sign-off processes within country operations.

Millicom has reviewed and updated KPI definitions this year and also translated them into local languages. This has improved consistency of data reporting. However, the process of definition review and update should continue as there is opportunity for further improvement and clarity.

During the Colombia site visit we identified a number of data accuracy issues that were resolved prior to final data consolidation. Work on aligning data reporting and definitions following the merger with UNE and should continue.

We support the intention to improve completeness in future reports by including data from Zantel (in Tanzania) and also from the Colombian subsidiaries currently excluded.

For and on behalf of DNV GL Business Assurance Services UK Limited
London, UK
23rd March 2016

Anne Euler
Principal Consultant and Lead Assurer
UK Sustainability, DNV GL – Business Assurance

Jon Woodhead
Regional Assessment Manager and Reviewer
UK Sustainability, DNV GL – Business Assurance

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www.dnvgl.com

Corporate and registered office
Millicom
2, rue du Fort Bourbon
L-1249 Luxembourg
Grand Duchy of Luxembourg

Postal address:
Millicom
B.P. 2312
L-1023 Luxembourg
Grand Duchy of Luxembourg
Tel: +352 27 759 101 Fax: +352 27 759 901

Corporate responsibility
Milko Pietikainen
VP, Corporate Responsibility
Millicom
2, rue du Fort Bourbon
L-1249 Luxembourg
Grand Duchy of Luxembourg
Tel: +352 27 759 475
CP@millicom.com

Visit Millicom’s homepage at http://www.millicom.com/our-responsibility/

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