



# Millicom Gifts & Hospitality Policy





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**Policy Statement**

Employees cannot receive gifts from third parties and cannot give gifts to third parties, except under certain exceptions.

Additionally, hospitality given or received by a third party must be approved and must remain within limits set forth in this policy.

At Millicom, we are strongly committed to the highest standards of ethics and compliance in the way we do business so that we can be a force for positive change everywhere we operate. Our compliant conduct can be boiled down to one line: obey the law; be honest and trustworthy in all you do; be transparent in your dealings; and be a positive force for good.

**1.0 Definitions**

|             |  |
|-------------|--|
| Gift        | Any object or benefit for which the recipient does not pay.  |
| Hospitality | Any occasion, or service where the individual or entity providing the benefit is present and participates.   |
| Employee    | Direct employees of Millicom and/or employees from all entities that Millicom owns or controls, including managing directors of the legal entities and contracted staff. Millicom Board Directors are not considered employees under this policy.  |
| Third Party | Any Millicom Third Party Intermediary (“TPI”), Business Partner, or other Supplier, consultant, and any other individual with whom Millicom interacts.   |
| Supplier    | Any supplier, vendor, contractor, distributor, consultant, and/or other Third Party providing goods, services, and supplies (including software) to support Millicom operations.   |
| TPI         | <p>A Third Party that interfaces on Millicom’s behalf, indirectly or directly, with Government Officials (such as Suppliers, consultants, and other service providers).</p> <div data-bbox="873 1646 1463 1835" style="background-color: #0070C0; color: white; padding: 10px;"> <p>Examples of TPIs include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Law firms;</li> <li>• Logistics companies; and</li> <li>• HR service companies.</li> </ul> </div> |



## Millicom Gifts & Hospitality Policy

|   |   |
|---|---|
| <p>Business Partner</p>                             | <p>A Third Party that Millicom has an investment or business arrangement with, such as a joint venture, local partnership, or other joint business activity where the Business Partner may interact with Government Officials on Millicom’s behalf, indirectly or directly.</p>   |
| <p>Family member or close relative</p>              | <p>An Employee or Third Party’s spouse, domestic partner, parents, children, siblings (or their spouses or domestic partners), relatives living in the same household as the Employee or Third Party, or persons with whom the Employee or Third Party has a close personal relationship.</p>   |
| <p>Government Official</p>                          | <p>Any director, officer, or employee of a foreign or local government or any department, agency, instrumentality thereof, or entity owned or controlled by a government outside the U.S. or the United Kingdom (“UK”);</p> <p>Any person acting in an official capacity for or on behalf of any such foreign or local government, department, agency, instrumentality, or entity;</p> <p>Any director, officer, or employee of any public international organization, such as the United Nations or World Bank;</p> <p>Any officer or employee of any political party or affiliation; and</p> <p>Any candidate for political office.</p> <div data-bbox="873 726 1459 856" style="border: 1px solid blue; padding: 5px; margin: 10px 0;"> <p>For purposes of this Policy, “Government Officials” may include family members or close relatives of anyone described in this section.</p> </div> <div data-bbox="873 894 1459 1325" style="border: 1px solid blue; padding: 10px; margin: 10px 0;"> <p>When a foreign or local government is organized similar to the U.S. and UK systems, it is clear what constitutes a government department or agency (such as a transportation authority or ministry of energy).</p>  <p>Many foreign and local governments are organized differently and operate through state-owned or state-controlled entities, particularly in the energy and telecommunications sectors. Employees of state-owned or controlled entities are “Government Officials.”</p> </div> |
| <p>Government and Politically-Affiliated Entity</p> | <p>Includes but is not limited to:</p> <ul style="list-style-type: none"> <li>• Any government department, agency, ministry, instrumentality, or entity, whether federal, state, or municipal, including the administrative, judicial, and legislative bodies;</li> <li>• Any political party or political campaign;</li> <li>• Any state-owned or state-controlled department, company, corporation, partnership, enterprise, public institution, or civil association;</li> <li>• Any public international organization, such as the United Nations, the World Bank, and the International Monetary Fund; and</li> <li>• Any recognized traditional or tribal council, governing body, or authority, or any recognized traditional or royal family.</li> </ul>  |



**Gadget**

A promotional/and or branded (company or product) item of small value, such as pens, t-shirts, notepads, mugs, or calendars.

**2.0 Prohibited Activities**

**2.1** Millicom prohibits Employees from giving or receiving Gifts, other than Gadgets of nominal value, on Millicom’s behalf or as part of their employment with Millicom. Under exceptional circumstances, Employees may make a formal request to the Chief Ethics & Compliance Officer prior to giving or receiving a Gift. Under such circumstances, the Employee may give or receive the Gift only after obtaining written approval from the Chief Ethics & Compliance Officer.

**2.2** Hospitality must not be provided with the intent to improperly influence another person (including Government Officials and private persons), or where the Hospitality could be perceived to improperly influence or create an obligation. Hospitality must not:

- 2.2.1** Be extravagant (e.g., exceed what is reasonable or appropriate);
- 2.2.2** Be frequent (more than once a year);
- 2.2.3** Be given to or accepted from a Government Official; and
- 2.2.4** Be illegal under local law or against a recipient’s own policies. It is each Employee’s responsibility to know a recipient’s policies and the applicable local laws.

**Not OK**

|  |  |
|--|--|
| Gifts offered or received  |  |
| Hospitality intended to influence a business decision                |  |
| Hospitality illegal under local law or against a Supplier’s policies |  |

**3.0 Permitted Activities**

**3.1** In general, Millicom Employees may give or receive a Hospitality only if:

- 3.1.1** It is reasonable and proportionate in expense (e.g., valued at \$0-\$100 USD);
- 3.1.2** It legitimately promotes Millicom’s business or capabilities;

**OK**

|                                      |  |
|--------------------------------------|--|
| Gadgets of nominal value             |  |
| Occasional meals of reasonable value |  |



- 3.1.3 It is consistent with generally accepted business practices in accordance with local customs and local law;
- 3.1.4 It does not go against Millicom’s values and ethical standards;
- 3.1.5 It was not solicited or requested with the intent to improperly influence another individual; and
- 3.1.6 The Employee obtains approval and properly discloses the Hospitality in accordance with this Policy.

**3.2 Disclosure Obligation.** To ensure compliance with this Policy, all Employees must fill out the Hospitality Disclosure Form for any Hospitality received or given and indicate value. Employees must electronically submit the Hospitality Disclosure Form immediately after receiving or before giving any Hospitality. A web based report form is available to facilitate the disclosure, review and the approval process.

**3.3 Document Retention.** Ethics & Compliance will maintain a register of disclosed Hospitality. If an Employee pays for Hospitality outside of Millicom’s invoicing and billing system, and the Employee wants to be reimbursed through the expense process, the Finance Department, who audits the expense claims, must confirm with the Ethics & Compliance Department that the Employee properly submitted the Hospitality Disclosure Form.



**3.4 Approvals.** Employees must obtain pre-approval before providing or receiving Hospitality, in certain cases. See section 3.4.1 for further details.

**3.4.1 Hospitality \$0-\$100 USD**

Employees must obtain pre-approval from their line manager prior to providing Hospitality valued at \$0-\$100.

Employees are allowed to accept hospitality valued at \$0-\$100 without pre-approval. However, all instances of hospitality, regardless of value, must be disclosed using the web based Hospitality Disclosure Form as soon as practically possible after the event.

Employees must obtain pre-approval from their Head of Department and the Ethics & Compliance Department prior to accepting Hospitality valued above \$100 USD. The pre-approval must be sought in writing via e-mail. All

| Ask First                            |   |
|--------------------------------------|---|
| Frequent Hospitality                 |  |
| Tickets to a sporting or music event |  |




instances must be disclosed using the web based Hospitality Disclosure Form with the pre-approval e-mail attached.

**3.4.2 Country Limits.** In certain countries where Millicom deems the globally set limits for Hospitality excessive, the local compliance committee will set an appropriate limit and submit the limit to the corporate Ethics & Compliance Department for approval. In such situations, the local compliance committee shall review the limits on an annual basis.

**3.5 Exceptions.** The Chief Ethics & Compliance Officer must provide written pre-approval for any exceptions to this Policy.



| Q&A                                  |   |
|---|---|
| Is Hospitality between Employees covered by the Policy?   | No. The Policy only applies to Hospitality provided or received externally. For guidance on Employee Gifts or Hospitality, please refer to the Employee Handbook. |
| How do I determine the value of a Hospitality?  | If you do not know the cost, you should use the fair market value of the Hospitality.   |
| Does the Gifts & Hospitality Policy apply if an Employee pays for Hospitality and does not expense it back to Millicom? | Yes. The rules apply whether or not the Employee seeks reimbursement from Millicom.   |
| Is Hospitality provided to or received from a TPI covered by this Policy?   | Yes. This Policy applies to any Hospitality received from or provided to an external party, including a Supplier, TPI, or any other Third Party.                  |

#### 4.0 Speak Up!



##### Reporting Concerns

- 4.1 Employees shall immediately report violations, suspected violations, or questions regarding this Policy or any applicable law or regulation directly to a line manager, Human Resources, or any member of the Ethics & Compliance Department or report violations or suspected violations through the [Millicom Ethics Line](#), Millicom’s external and independent reporting service, which is available twenty-four hours a day, seven days a week.
- 4.2 Contact information, country-specific numbers for Millicom’s reporting service, and an online reporting mechanism are available via the [Millicom Ethics Line](#), in the Ethics & Compliance section of the Millicom website and intranet sites, and on posters in your facility’s Employee posting area.
- 4.3 All line managers shall be responsible for the enforcement of and compliance with this Policy, including providing Employees necessary access to the latest version of this Policy.
- 4.4 Millicom will take disciplinary action against anyone who retaliates against Employees who initiate or participate in Ethics & Compliance Department investigations. While Millicom encourages Employee reporting, Millicom does not tolerate false reports made simply to harm another Employee.





**5.0 Resources**

- 5.1 Code of Conduct
- 5.2 Anti-Corruption Policy
- 5.3 Conflicts of Interest Policy
- 5.4 Government Official Interactions Procedure
- 5.5 Speak Up Policy
- 5.6 Sponsorships & Donations Policy
- 5.7 Third Party Management Policy
- 5.8 Anti-Money Laundering Policy

**6.0 Revision History**

| Revision No.                        | Effective Date | Changes | Prepared By    | Reviewed By |
|-------------------------------------|----------------|---------|----------------|-------------|
| A-O                                 | [insert date]  |         |                |             |
|                                     |                |         |                |             |
| <b>Latest Revision Approved By:</b> |                |         | <b>Signed:</b> |             |
|                                     |                |         |                |             |



## Hospitality Disclosure Form