Appendix: Corporate Responsibility





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Corporate Responsibility Appendix

Wrapping Up a Great Five Years

This appendix highlights what we have achieved over the past year in each of the material CR topics we have identified.

2018 has been a milestone year given that it as the last of the 2014 five-year plan. It has found us with CR firmly embedded in the day-to-day practices of many of our core business areas, leading to mutual learning, as well as an increasingly regional scope and positive impacts of our flagship programs. In the following pages we will share the main achievements and lessons learned which are at the core of the work laid out in our new five-year plan.

This corporate responsibility report includes the Honduras and Guatemala joint ventures as if fully consolidated in accordance with our management reporting. Reported indicators exclude Emtelco, Ghana, Nicaragua, and recently acquired Panama operation. Additional exclusions, where applicable, are detailed in footnotes.

Measure the success and health of our company beyond financials	 What we did in 2018 Strenghthened the collaboration with other business functions to best align CR and business objectives. Revised our data-management processes to enhance continuous improvement of our reports to stakeholders. Launched an updated CR Framework that stresses the intrinsic connection between our CR and business strategies.
Promote, protect, and strengthen our performance and reputation	 What we did in 2018 Continued to actively engage with our investors, partners, and other key stakeholders. Conducted our first external GNI Assessment.
Demonstrate thought leadership in areas that link to business success	 What we did in 2018 Conducted a one-of-a-kind study in Colombia to understand how children use the internet. Relaunched a best-in-class Supplier Training Program on CR. Rolled out a Women's Digital Inclusion program in all Latam.

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Five-year plan objectives (by 2018)	Where we are today	What we learned
 1. Privacy and freedom of expression » Complete an external assessment of Millicom's policies and processes relating to privacy and freedom of expression. 	» Millicom has evolved its Privacy and Freedom of Expression (FoE) framework with a new Global Privacy Policy and an updated set of Law Enforcement Assistance and Major Events Guidelines, fit for today's technological and security challenges. Our LED report has been recognized as best practice in the industry.	» We will continue our engagements with peers/ other stakeholders on our policies and practices. It is our firm belief that positive outcomes for human rights will only come from collaboration via a multi-stakeholder forum such as the GNI - this is the best way to address such complex challenges.
 2. Child rights and online protection » The Mobile Operator Child Rights Impact Assessment (MO CRIA) tool we jointly developed with UNICEF is used across the mobile operator community. » Conduct the MOCRIA in all operations in Africa and 50% of operations in Latam. » Integrate promotion of parental controls and distribution of safe internet into mobile, fixed, and cable TV customer processes in Latin America. » Publish child online protection (COP) policy and accompanying guidelines, and roll out across all operations. 	» While to our knowledge no other companies of the industry have publicly adopted the use of the MOCRIA, it has been conducted in all our Latam operations with action plans in place. Parental controls are available for digital cable TV devices. COP Policy is in place, with COP training programs well established across the region, targeting parents, teachers and caregivers.	»Through our work on COP, we learned that our assessment and work needed to be expanded to the broader concept of Child Rights. We are also introducing findings from the MOCRIA into business processes, products and services.
 3. Acting with integrity: anti-corruption compliance Continue external and internal monitoring of the Anti- Bribery and Anti-Corruption (ABAC) program enhancements with a view to measure the maturity level of the compliance framework over time. Embed compliance risk management into business risk management at global, regional, and local level. Third-party due diligence for end-to-end process, from landowners to suppliers, IT software providers etc. based on risk level. 	» We have established a robust Anti-corruption Program, rolling out policies across the organization to meet our legal compliance obligations and acquired automated solutions for third party vetting to improve corruption risk management within the organization	» While having policies and screening tools may mitigate corruption risks, implementing a comprehensive framework where anti-corruption procedures are embedded in business processes have proven effective, as well has the risk based training modules that enables employees to assess potential risk of corruption in their day to day function.
 4. Reducing our environmental footprint » Establish a cross-functional steering committee and global energy reduction and green energy strategy. » 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. 	» Our operations have directed investments and technology into our infrastructure to reduce our energy consumption, and have implemented e-waste programs with vendors. We will establish a steering committee which will focus on a comprehensive climate strategy and targets.	» While we have examples of good practices throughout our operations, an improved governance process will allow us to further replicate, scale and measure the results of these practices with common metrics.

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Five-year plan objectives (by 2018)	Where we are today	What we learned
 5. Diversity » Increase the number of women among senior managers each year. » Establish a Group-wide maternity and paternity leave policy, to also include a shortened working week for breastfeeding mothers. 	» Percentage of women in senior management has increased Company-wide from 22 to 29% and gender equality at all levels will continue to be at the forefront of our inclusion efforts.	Our work towards a more inclusive workplace focuses on a broad range of life circumstances and needs. We are working with our operations to enhance inclusion across all dimensions of diversity.
 6. Taking care of our people » Continue our zero-fatality commitment. » Review risk assessments for each country on a quarterly basis and update and manage as required. » Continue reporting to senior management and the Board on progress and incidents on a monthly basis. 	 » Since 2017, Health and Safety is part of the Integrated Services' team scope of work for a comprehensive approach across risk categories. » Zero Fatality is a commitment that never expires and we will continue to seek ways to reduce the occurrence of all incidents by root cause analysis, remediation action plans, and targeted training. 	» Learning is part of everyday management and each incident is carefully analyzed to enhance prevention. We will continue to focus on management protocols, reporting, trend analysis to identify key risks and refurbish our mitigation controls. These points are tied in with an extensive program of accident/ incident awareness training.
 7. Responsible supply chain management » Full supplier monitoring program in place, including self- assessments and on-site audits. » Support capacity building of local suppliers to manage corporate responsibility-related risks. 	 We have increased the maturity level of our supplier assessment and monitoring programs by integrating a Supplier Due Diligence platform in our vetting process. We have an established supplier CR training in Latam. 	» We will step up our efforts to incorporate relevant CR criteria in our Procurement analysis and decision- making processes, further the collaboration between CR and Procurement teams, and provide CR training tailored to Procurement staff members.
 8. Social investment » Connect 2,100 schools and public institutions to the internet by 2030 in Latin America. » Implement a volunteering program with digital education initiatives in all our markets by 2020. 	» Our Social Investments (SI) have become more regional and strategic. We have already achieved 5 % of the goal for 2030. In addition, all Latam markets have ongoing volunteer programs focused on COP and the use of technology.	» SI is more a tool than an issue in and of itself. Therefore, we are discontinuing "Social Investment" as a separate focus area. Our updated CR framework contains our flagship programs under Responsible Leadership in Action. This will enable a more regional, strategic and measurable approach to our investments.

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1. Privacy and freedom of expression

КРІ	2017 value	2018 value
% of operations with controls systematically applied in line with the Group guidelines $^{\scriptscriptstyle 1}$	100%	100%
Total number of law enforcement requests (Group)	41,323	45,666²
Number of major events	14	20

1 Based on 11 operations.

Law Enforcement Requests

КРІ	2017 value	2018 value
Number of law enforcement requests - Latam		
Interception	971	2116
Customer metadata	32,340	33,868
MFS	181	523 ²
Content Takedown	1	0
Number of law enforcement requests - Africa		
Interception	0	0
Customer metadata	7,705	8,930
MFS	251	228
Content Takedown	3	1

Overview of Major Events by Type³

2017 value	2018 value
2	7
4	5
1	2
2	2
0	1
5	3
	2

MFS values for requests in Paraguay derived from estimates.
 Data reported for financial year, including 2017 data.
 Renamed from "Shutdown of services" to "shutdown or restriction of services".
 Concerning government surveillance, interception or other (with Privacy or FoE-related implications).

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2. Child rights and online protection

KPI	2017 value	2018 value
% of operations with controls systematically applied in line with the minimum age policy	100%	100%
% of operations with child risk impact assessments conducted to date	57%	100%
% of operations that have hosted a multi-stakeholder COP workshop to date	86%	100%
% of operations with a child online protection portal	71%	71%
Number of children reached by COP training (000)	188.6	360.1 ¹
% of operations in Latam blocking child sexual abuse content	71%	71%

1 Cumulative from 2016. From October 1, 2017 to September 30, 2018, the number of children reached by COP training was 171,500 in Latam.

3. Acting with integrity: anti-corruption compliance

KPI	2017 value	2018 value
% of employees who acknowledged the Code of Conduct	96 ¹	91
% of employees who have completed the Code training	96 ²	90
% of procurement staff trained on ABAC	96	97
% of senior managers trained on ABAC	98	99
% of employees who filled and signed the conflict of interest declaration form	90.5	92 ³
Number of cases of unethical behavior reported and investigated	164	3364
Investigations resulting in written warning	6	72
Investigations resulting in termination of employee contract	58	31
% revenue from MFS represented by operations audited for AML controls	27	97 ⁵
% of operations (where) we conducted a compliance risk assessment or audit	45	30
Turnover of procurement staff (%)	17	28

The percentages of employees who acknowledged the Code and who have completed the Code training are the same as both were done simultaneously for 2017. 1 In the framework of the 2017 Global Compliance Awareness Week, held in November 2017, acknowledgment of the Code was simultaneous with the training, hence the identical percentages. Employees are required to complete a training session on both the Code and Anti-Bribery and Anti-Corruption at least once a year. The Corporate Offices' training completion rate excludes employees on long-term leave. 2

Guatemala not included because, as of December 31st, 2018, authorization of the conflict of interest form and policy is pending by local compliance committee. 3

Incidents reported through Millicom Ethics Line and Linea Etica TigoUne. Incidents reported from Guatemala were channeled through Millicom Ethics Line in 2018, as Linea 4 Ética Tigo Guatemala, currently going through an upgrading process, was. Incidents reported through Linea Ética Tigo Guatemala are included as of 2017. In addition to the inclusion of the incidents reported through Linea Ética Tigo Guatemala, the increase in incident count can be attributed to the efforts placed in promoting the Ethics lines. 5 In 2018, 6 of our 8 operations offering MFS were audited on their AML controls.

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3. Acting with integrity: anti-corruption compliance—continued

Overview of cases reported to Millicom Ethics Line¹

Bribery and Corruption

KPI	2017 value	2018 value
Number of cases reported and investigated	7	10
Cases resulting in written warning	0	2
Cases resulting in termination	0	3

Discrimination and Harassment

KPI	2017 value	2018 value
Number of cases reported and investigated	12	49
Cases resulting in written warning	0	16
Cases resulting in termination	0	10

Human Rights and Labor

КРІ	2017 value	2018 value
Number of cases reported and investigated	22	0
Cases resulting in written warning	2	0
Cases resulting in termination	0	0

Conflict of Interest

KPI	2017 value	2018 value
Number of cases reported and investigated	7	24
Cases resulting in written warning	0	4
Cases resulting in termination	0	3

Fraud

KPI	2017 value	2018 value
Number of cases reported and investigated	10	16
Cases resulting in written warning	0	3
Cases resulting in termination	3	2

Other

КРІ	2017 value	2018 value
Number of cases reported and investigated	22	89
Cases resulting in written warning	4	21
Cases resulting in termination	1	4

1 The metric "Cases resulting in written warning or termination" reports number of cases with that outcome; not number of written warning and/or terminations. One case can include warnings and/or terminations to multiple employees.

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4. Reducing our environmental footprint

e-waste recycled through responsible waste management program (tonnes)¹

2017 value	2018 value
474	7.74
77	587
44.5	310
162	147
1,037	400
3.52	0
236	105.18
462	400
	474 77 44.5 162 1,037 3.52 236

1 Program also set up in Chad. No values available for this operation.

Energy use

Total Energy Consumption/Sources of Energy by Asset Type

KPI	2017 value	2018 value
Base station and fixed network sites ¹		
Fuel (000 l)	14,732	10,435.32
Energy from fuel (MWh)	147,073	104,178.29
Electricity (MWh)	354,949	444,885.99
Our fleet ²		
Fuel (000 l)	6,335	4,063.98
Energy from fuel (MWh)	60,756	38,609.45
Electricity (MWh)	N/A	N/A
Datacenters and offices ³		
Fuel (000 l) ³	988	449.74
Energy from fuel (MWh)	24,082	4,489.88
Electricity (MWh)	55,885 ⁵	89,582.09
Shops ⁶		
Fuel (000 I)	332	23.44
Energy from fuel (MWh)	3,312	233.94
Electricity (MWh) ⁷	15,509	16,916.97

1 Zantel excluded.

Zantel excluded.
 Fuel consumption for fleet includes gasoline and diesel consumption.
 Many of our data centers are co-located with our offices. Therefore, they often do not have separate meters to enable us to report on datacenter consumption separately. Zantel excluded for 2017 and Chad excluded for 2017 and 2018. Estimated data for Colombia Movil.
 Electricity consumption for offices and datacenters in El Salvador excluded in 2017.
 Zantel and Chad excluded for 2018.
 Electricity consumption for shops in Guatemala is calculated based on electricity cost.

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Emissions and e-waste overview

КРІ	2017 value	2018 value
Total weight of e-waste recycled through our responsible e-waste management program	2,496.02	1,956.92
Scope 1 emissions (tonnes CO ₂ e) ¹	58,787	39,181
Scope 2 emissions (tonnes $CO_2^{(2)}e)^2$	114,883	141,439
Scope 3 emissions (tonnes $CO_2^{2}e)^3$	NA	NA
% of operations set up on global responsible e-waste recycling program	91	91
% of operations with controls systematically applied in line with the environment policy	100	100
Tonnes of CO ₂ e emissions per USD\$1,000 revenue	0.029	0.03

 Emissions from fuel are calculated using World Resources Institute (2015) GHG Protocol tool for stationary combustion, version 4.1.
 Emissions from electricity are calculated using Electricity Emission Factors from IEA, version 2016, except in the cases of Paraguay and Chad, where other official sources were used. Zerbal enduded used. Zantel excluded.

3 Not included, as we are currently reassessing our methodology for reporting Scope 3 emissions.

5. Diversity		
КРІ	2017 value	2018 value
% of operations with breastfeeding rooms in Latam	64	100
% of women in senior management positions	33	28
% of women across our employee base	40	41

6. Taking care of our people

KPI ¹	2017 value	2018 value
% of operations with controls systematically applied in line with our Group health and safety policy	100	100
% of operations in line with OHSAS 18001	100	100
% of operations certified against OHSAS 18001	46	91
Number of employee fatalities ¹	1	0
Number of contractor fatalities	9	2
Number of health and safety incidents reported	387	369
Lost-time injury rate per 1,000 workers	2.6	0.54
Absentee rate	0.8	1.29

1 Numbers of employee and contractor fatalities reported are aligned with the reporting period from October 1st 2017 to September 30th, 2018. Fatalities for previous years have been reported between the same dates.

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KPI	2017 value	2018 value
Total number of suppliers invited to complete an EcoVadis assessment	321	326
Total number of suppliers who completed the assessment		129
Total number of suppliers that do not fulfill our requirements		58
Number of suppliers with improved scores following implementing corrective action plans (CAPs)	47	73
Number of CAPs requested from suppliers by EcoVadis categories		
Environmental	58	35
Labor rights	127	81
Fair business practices	88	59
Sustainable procurement	63	36
% of strategic suppliers who signed the supplier code	89	89
% of all suppliers who have signed the supplier code	61 ¹	65
% of spend represented by suppliers who completed assessments on EcoVadis to date	47.3	42
% of procurement teams trained on responsible supply chain management	96 ²	81 ³
Number of suppliers trained on Millicom's corporate responsibility strategy and requirements		108
	ocally. The 2018 va	lue includes

Guatemala's information excluded from this percentage for 2017 as a different definition was applied to calculate the indicator locally. The 2018 value includes

Guatemala. 2 Procurement teams training focused on Anti-Bribery, Anti-Corruption (ABAC) in 2017, as reported in the Compliance performance table for that year (page 103). 3 Colombia excluded

8. Social investment

KPI	2017 value	2018 value
Number of volunteering hours	14,841	24,732
Monetary value of employee volunteering (US\$ 000)	170	235
Total cash contributions (US\$ 000)	3,203	3,776
In-kind giving (US\$ 000, at cost)	6,399	6,737
Schools and public institutions connected to the internet 1	1,259	1,361
Women enrolled in digital inclusion programs ²	New KPI for 2018	117,340
Women enrolled in financial inclusion programs ²	New KPI for 2018	97,978

 Cumulative since 2016, then the commitment with the ICT 2030 Alliance was signed with the OAS (see page 80 of our 2016 Annual Report).
 Depending on local curriculum, women enrolled in training programs receive training on both digital and financial inclusion, therefore the two figures partially overlap and should not be combined.

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Independent Limited Assurance Report

Strategy

To the Management and Directors of Millicom International Cellular S.A.

Scope of work

We have undertaken a limited assurance engagement in relation to the Millicom International Cellular S.A (Millicom) Corporate Responsibility Report (Pages 100 – 109) of the Millicom Annual Report 2018 (the "Corporate Responsibility Report").

The scope determined by Millicom for the preparation of this independent limited assurance report is described below:

Reporting Section	Indicator Description	KPI Reference Review Period 2018
Privacy and freedom of expression	% of operations with controls systematically applied in line with the Group guideline	Q4 2017 -Q3 2018
	Total number of law enforcement requests (Group)	Q4 2017 - Q3 2018
	Number of major events	Q1 2018 - Q4 2018
Acting with integrity	% of employees who acknowledged the Code of conduct	Q1 2018 - Q4 2018
	% of employees who have completed the Code training	Q1 2018- Q4 2018
	% of procurement staff trained on ABAC	Q1 2018- Q4 2018
	% of senior managers trained on ABAC	Q1 2018- Q4 2018
	% of employees who filled and signed the conflict of interest declaration form	Q1 2018- Q4 2018
	Number of cases of unethical behavior reported and investigated	Q1 2018 - Q4 2018
	Investigations resulting in written warning	Q1 2018 - Q4 2018
	Investigations resulting in termination of employee contract	Q1 2018 - Q4 2018
	Turnover of procurement staff	Q4 2017 - Q3 2018
Reducing our environ- mental footprint	Total Energy Consumption / Sources of energy by asset type	Q4 2017 - Q3 2018
	Scope 1 and 2 carbon emissions	Q4 2017 - Q3 2018
Diversity	% of women in senior management positions	Q1 2018 - Q4 2018
Taking care of our people	Absentee rate	Q4 2017- Q3 2018
Responsible supply chain management	Total number of suppliers invited to complete an EcoVadis assessment	Q4 2017 - Q3 2018
	% of strategic suppliers who signed the supplier code	Q4 2017 - Q3 2018
	% of all suppliers who have signed the supplier code	Q4 2017 - Q3 2018
	% of procurement teams trained on responsible supply chain management	Q4 2017 - Q3 2018

The Millicom Corporate Responsibility Report was prepared in accordance with AA1000 AccountAbility Principles Standard 2008 (AA1000 APS 2008).

Criteria

Our review was carried out based on:

- AA1000 AccountAbility Assurance Standard 2008, with a moderate level of type 2 assurance.
- Standard ISAE 3000, Assurance Engagements, issued by the International Auditing and Assurance Standard Board (IAASB) of the International Federation of Accountants (IFAC), with a limited scope of assurance.

Management's Responsibility

The management of Millicom is responsible for the preparation and fair presentation of the Corporate Responsibility Report in accordance with the Criteria, and is also responsible for the selection of methods used in the Criteria. Further, Millicoms' management is responsible for establishing and maintaining internal controls relevant to the preparation and presentation of the Corporate Responsibility Report that is free from material misstatement, whether due to fraud or error; selecting and applying appropriate criteria; maintaining adequate records and making estimates that are reasonable in the circumstances.

Assurance Practitioner's Responsibility

Our responsibility is to provide with independent third-party limited assurance

on the content of Millicom's Corporate Responsibility Report according to the scope previously defined.

Our procedures were designed to obtain a limited level of assurance on which to base our conclusion, and, as such, do not provide all of the evidence that would be required to provide a reasonable level of assurance. The procedures performed depend on the assurance practitioner's judgement including the risk of material misstatement of the Corporate Responsibility Report, whether due to fraud or error. While we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls.

Our procedures did not include testing controls or performing procedures relating

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to checking aggregation or calculation of data within IT systems, which would have been performed under a reasonable assurance engagement.

Independence

We have performed our work in accordance with the standards of independence required by the Code of Ethics of the International Federation of Accountants (IFAC).

Applied procedures

Our assurance procedures consisted in requesting information from Millicom Corporate Responsibility department and business areas participating in the preparation of the Corporate Responsibility Report and applying analytical procedures and sampling tests as described in general terms below:

- 1. Interviews with senior managers responsible for management of Corporate Responsibility issues and review of selected evidences to support issues discussed. The list of interviewees included Executives with overall responsibility for Millicom's Corporate Responsibility strategy and programmes and for specific functions, including Supply Chain, Health and Safety, Privacy and Compliance. The purpose of these interviews was to obtain awareness of the Corporate Responsibility objectives and policies as well as how they are put into practice and integrated into Millicom's strategy
- 2. Review of Millicom's approach to stakeholder's engagement and outputs.
- 3. Review of the processes for gathering and consolidating the specified performance data and, for a sample, checking the data consolidation.
- 4. Checks on a sample basis of the quantitative information included in the Corporate Responsibility Report as well as its adequate compilation from data supplied by information sources. The tests have been defined to provide limited assurance levels in line with the criteria described in this report.
- 5. Site visits in Millicom's operations in Guatemala and Paraguay to review process and systems for preparing site level corporate responsibility data and implementation of Corporate Responsibility strategy.

Conclusions

Based on our limited assurance procedures described above, nothing has come to our attention that causes us to believe that the Corporate Responsibility Report is not presented fairly, in all material respects, in accordance with the Criteria (the principles established in standard AA1000 APS 2008) such as:

1. Inclusiveness

- In 2018, Millicom continued its efforts to engage and establish relationships with its key stakeholders, with regards to CR, such as, quarterly updates for the Board of Directors and for investors, interactions with civil society and active participation in GNI. Specifically, they used the opportunity of the materiality assessment this year to include various stakeholders across four key groups, namely investors, civil society, customers and employees into CR discussions.
- Millicom partnered with the EAFIT University in Medellin, Colombia to launch a pioneering assessment on the use of ICT by children, that not only conducted research but also actively involved members of civil society and Millicom employees.

2. Materiality

- In 2018, Millicom developed a new materiality matrix with the support of an external provider. This materiality matrix has been based on a series of more than 40 interviews in total, covering various types of internal and external stakeholders. With this initiative, Millicom has responded to the prior years' assurance observations regarding materiality assessment and demonstrates its commitment to continuous improvement in this area.
- Millicom has developed the necessary competencies of internal CR stakeholders to apply the materiality based reporting process and to strengthen their awareness on importance of data management and quality.

3. Responsiveness

 Millicom's Law Enforcement Disclosure (LED) committee is formed by a cross functional team of internal stakeholders that views relevant issues of privacy, cybersecurity and freedom of expression in a combined manner. It keeps track of trends and concerns in this sector, and regularly interacts with key external stakeholders. One of the key responses to these challenges was carrying out the GNI assessment and development of the 'Global Privacy Policy' in 2018.

- In 2018, Millicom developed both a "Corporate Responsibility Reporting Governance Process" and a "Reporting Guidelines" that aim at strengthening the Corporate Responsibility Reporting process by detailing roles and responsibilities, definitions of the key indicators, data flow, required evidences for indicators and calculations and data control. Moreover, Millicom trained the whole "CR team" in the various local operations including "Data contributors" and "Data validators" to this new "Corporate Responsibility Reporting Governance Process".
- Through its continuous improvement of learning processes, Millicom further enhanced the training provided to its key suppliers with one-on-one follow-up sessions to ensure that suppliers understand the high expectations and standards of Millicom regarding critical issues, such as Ethics, Privacy, Child Rights, Diversity, Health and Safety and Environment.

Recommendations

We also presented to Millicom our recommendations regarding areas of improvement related to the application of standard AA1000 APS 2008 as well as to actions taken with main stakeholders. The most significant recommendations are summarized below:

1. Inclusiveness

- We support the commitment of Millicom to go further in the holistic dissemination of information and expectations across the entire value chain, by ensuring that the content of the Responsible Supply Chain Management training, currently provided to the procurement team, is aligned and made consistent with that of the Supplier training program carried out for LATAM suppliers in 2018.
- While already implemented throughout 2018, we recommend that Millicom continues to identify opportunities to develop communication platforms in order to broaden and strengthen its dialogue on CR with all its stakeholders, such that their expectations and priorities can be consistently incorporated into Millicom's CR strategy and action plan.

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2. Materiality

• We recommend Millicom to not only continue to implement its plan to conduct the materiality assessment on a biennial basis, but also to monitor key trends and context that can assist in regularly updating their CR action plan.

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• We further recommend Millicom to use the opportunity of the results of the new materiality assessment and creation of the new CR action plan to further refine material requirements and their actions at the country level.

3. Responsiveness

 Although Millicom deployed the "Corporate Responsibility Reporting Governance Process" and "Reporting Guidelines", the on-ground application and integration of these processes and guidelines needs further efforts. As already started in 2018, we recommend Millicom to pursue its implementation in all locations and departments. In this regard, we also recommend to further strengthen data collection and control processes regarding the monitoring and follow up of Health & Safety (H&S) incidents and continue to develop communication with external providers on H&S issues. We also recommend Millicom to pursue its efforts for an enhanced reporting of Environmental data.

• In order to continue and enhance dialogue with key stakeholders, we recommend Millicom to respond to its stakeholder's material CR concerns by developing a process and methodology of communication on achievements of commitments and progress against goals of its CR action plan.

Ernst & Young Société Anonyme Cabinet de Révision Agréé

Olivier Lemaire Partner David Cau Director

