



Millicom Anti-Corruption Policy

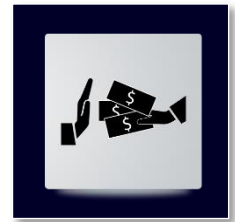




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Policy Statement


At Millicom, we are committed to doing business ethically so we can be a force for positive change everywhere we operate. Millicom has a zero-tolerance approach to any form of Bribery or Improper Payments (as defined below). This Policy applies to all Employees and management of Millicom, Tigo, and other Millicom group companies (collectively, “Millicom” or the “Company”), including directors and contracted staff (collectively, “Employees”), as well as any Third Parties (as defined below). Millicom is strongly committed to the highest standards of business ethics and compliance.

Our Code of 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

Bribery	<p>The offering, promising, or giving of anything of value to another person, made directly or indirectly, with the intent to induce such person to act improperly in the performance of his/her duties (i.e., active bribery); or</p> <p>The requesting, agreeing to receive, or accepting anything of value from another person, made directly or indirectly, with the intent to induce the recipient to act improperly in the performance of his/her duties (i.e., passive bribery).</p>
Employee	<p>Direct employees of Millicom and/or employees from all entities that Millicom owns or controls, including directors and contracted staff.</p>
Third Party	<p>Any Millicom Third Party Intermediary (“TPI”), Business Partner, or other Supplier, consultant, and any other individual with whom Millicom interacts.</p>
Supplier	<p>Any supplier, vendor, contractor, distributor, consultant, and/or other Third-Party providing goods, services, and supplies (including software) to support Millicom operations.</p>
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 1486 1463 1682" 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"> • Law firms; • Logistics companies; and • HR service companies. </div>
Business Partner	<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</p>



	<p>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>Merger, Acquisition, and Divestments</p>	<p>A transaction involving Millicom and at least one other company, such as a merger, acquisition, consolidation, purchase of assets, and management acquisition.</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="875 785 1463 913" style="background-color: #0070C0; color: white; padding: 5px;"> <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="875 955 1463 1383" style="background-color: #0070C0; color: white; padding: 5px;"> <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"> • Any government department, agency, ministry, instrumentality, or entity, whether federal, state, or municipal, including the administrative, judicial, and legislative bodies; • Any political party or political campaign; • Any state-owned or state-controlled department, company, corporation, partnership, enterprise, public institution, or civil association; • Any public international organization, such as the United Nations, the World Bank, and the International Monetary Fund; and



	<ul style="list-style-type: none"> Any recognized traditional or tribal council, governing body, or authority, or any recognized traditional or royal family.
<p>Improper Payment</p>	<p>The giving or receiving of inducements or anything of value, for any reason, in order to:</p> <ul style="list-style-type: none"> Influence someone’s judgement about Millicom products and services or those of another company; Gain an improper advantage when selling our goods and services, conducting business transactions, or representing Millicom interests; or Influence the use of discretionary authority by any Government Official. <div data-bbox="875 359 1463 1087" style="background-color: #0070C0; color: white; padding: 10px;"> <p>Improper Payments include:</p> <ul style="list-style-type: none"> Bribery; Paying for something beyond the Company’s legal right, or to which the Company is not legitimately entitled; Improper donations, sponsorships, or contributions of Millicom funds or assets to political parties or their leaders or candidates for public office; Improper donations, sponsorships, or contributions of Millicom funds or assets to companies, public institutions, or private charities related to or at the direction of a Government Official; Loans of Millicom assets; and Direct or indirect payments in any form, including gifts, travel, offers of employment, or reimbursement to Employees or Third Parties for donations, sponsorships, or payments they might personally have made.  </div>

2.0 General Principle

2.1 Do what’s right for the right reason and be a force for positive change. Millicom is committed to maintaining the highest ethical standards and preventing corrupt practices in all business transactions. Millicom Employees, TPIs, and Business Partners must comply with all local anti-corruption laws wherever we operate (including Sweden, Luxembourg, and all other jurisdictions applicable to Millicom), including, but not limited to, the U.S. Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act (“UKBA”).

Anti-Corruption Provision	FCPA	UKBA
Prohibits bribery of Government Officials	☑	☑
Prohibits commercial bribery (bribery to private individuals)		☑
Prohibits active bribery (the giving of a bribe)	☑	☑
Prohibits passive bribery (the taking of a bribe)		☑



3.0 Roles and Responsibilities






3.1 Employees. Employees must be aware of and comply with all of the provisions of the Millicom Code of Conduct, related policies, and their obligations under this Policy. Employees must immediately report violations, suspected violations, or questions regarding this Policy to the Ethics & Compliance Department. Violations of the Code will result in disciplinary action, up to and including dismissal or removal from office. Violations of the Code that involve illegal behavior will be reported to the appropriate person.

3.2 TPIs and Business Partners. TPIs and Business Partners must be aware of and comply with the Millicom Supplier Code of Conduct and their obligations under this Policy. TPIs and Business Partners must immediately report violations, suspected violations, or questions regarding this Policy to the Ethics & Compliance Department.

3.3 Ethics & Compliance Department. The Ethics & Compliance Department must approve all TPIs and Business Partners pursuant to the Third-Party Management Policy. The Ethics & Compliance Department must also approve all sponsorships and donations made on Millicom’s behalf pursuant to Millicom’s Sponsorships & Donations Policy.

3.4 Finance Department. The Finance Department must ensure that books, records, and accounts related to their operations accurately and fairly reflect, in reasonable detail, the transactions and dispositions of the assets under their control.

3.5 Line Managers. Line managers must ensure that Employees reporting to them are aware of and comply with this Policy. Line managers must also ensure that TPIs and Business Partners within their area of responsibility have been vetted and approved pursuant to the Third-Party Management Policy.



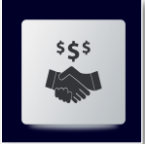


Do's			
Refuse to make any Improper Payments			
Document transactions and provide documentation to Finance			
Report any requests for Improper Payments			



4.0 Key Provisions of Anti-Corruption Laws

4.1 Millicom Employees may not receive, offer, promise to pay, pay, or authorize Improper Payments to any individual, including Government Officials, with the intent to obtain or retain business, secure an improper advantage, or influence Government Official actions or decisions. We cannot request, accept, or agree to accept anything of value if the item is intended or appears to be intended to gain an improper business advantage.

4.1.1 TPIs and Business Partners. The FCPA and UKBA prohibit Improper Payments made directly from Millicom or through TPIs or Business Partners. Millicom could face liability based upon Improper Payments made through its TPIs or Business Partners. To mitigate this risk, Millicom requires written agreements pre-approved by the Ethics & Compliance Department with all TPIs and Business Partners acting on behalf of the Company. Millicom conducts reasonable, risk-based due diligence on all TPIs and Business Partners. For more information on TPIs and Business Partners, please consult the Third-Party Management Policy.

Don'ts	
 	
Authorize Improper Payments to influence Government Official actions	
Make a facilitating payment to expedite the release of goods from customs	
Pay travel expenses for a Government Official's family members	

5.0 Facilitating and Extortion Payments

5.1 Facilitating or “grease” payments are payments made to Government Officials to expedite performance of routine, non-discretionary government actions to which Millicom is legally entitled.

5.2 Millicom strictly prohibits facilitating payments. Employees who receive a request from a Government Official for a facilitating payment must immediately contact the Ethics & Compliance Department.

5.3 Extortion payments are payments where Employees reasonably believe their immediate personal safety or health is in danger if they do not make the payment. Extortion payments are

Millicom Employees must report, in writing, all incidents where extortion payments are involved (whether paid or not) to their line manager. Line managers must promptly inform the Ethics & Compliance Department of the incident in writing.



not facilitating payments. The safety of our Employees (and anyone working on Millicom’s behalf) is our number one priority. Although circumstances may require making such payments, Employees or anyone working on Millicom’s behalf must properly document and record any such extortion payments in the Company’s books and records.

6.0 Business Hospitality and Other Expenses

6.1 The exchange of business gifts, meals, and hospitality is an acceptable and customary part of conducting business and building relationships. Employees are prohibited from offering gifts, meals, or other business hospitality in exchange for any improper benefit. 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 Global Ethics & Compliance Department 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. In general, Millicom Employees may give or receive a hospitality only if:



- 6.1.1** It is reasonable and proportionate in expense;
- 6.1.2** It promotes Millicom’s business or capabilities (such as a pen with Millicom’s logo on it);
- 6.1.3** It is consistent with generally accepted business practices in accordance with local customs and local law;
- 6.1.4** It does not go against Millicom’s values and ethical standards; and
- 6.1.5** It was not solicited or requested.

6.2 Prior to offering or accepting a hospitality, we must ensure there is a clear business purpose, and an outside party could not interpret the hospitality as an attempt to improperly influence a decision or gain an improper business advantage.

6.3 Our interactions with Government Officials carry greater risk because of their potential influence over official actions. Employees must obtain prior, written approval from the Global Ethics & Compliance Department before offering to provide or providing any hospitality or other expense to Government Officials. Millicom will not pay for the travel expenses of a Government Official’s family members or side trips unrelated to Millicom business.

6.4 For further guidance regarding what constitutes appropriate hospitality, please consult your line manager, the Gifts & Hospitality Policy, or the Ethics & Compliance Department.



7.0 Political Contributions

7.1 Millicom is politically neutral, is not directly or indirectly affiliated with any political party and does not provide services linked to any political messages. Political contributions may pose corruption risk and invite the perception that Millicom is attempting to improperly influence Government Officials. For this reason, Employees may not contribute Company funds, time, or assets to political parties or candidates for political office. Millicom prohibits Employees from making or approving political contributions on Millicom’s behalf or as a representative of the Company, regardless of level of authority. Consistent with the Code of Conduct and the Sponsorships & Donations Policy, Employees must make clear that any political activity reflects an Employee’s individual beliefs and not those of Millicom.

Political contributions include any donations to political parties, campaigns, or candidates for political office. For further guidance, please consult the Sponsorships & Donations Policy.

8.0 Sponsorships and Donations

8.1 Millicom is committed to responsibly supporting and improving the communities and environments in which we work. Sponsorships or donations for organizations that use Millicom’s services or are otherwise involved in business with Millicom may, in some cases, pose corruption risks. For this reason, all sponsorships must be approved, in writing, by the Marketing Department and/or the External Affairs Department, depending on the nature of the sponsorship (e.g., in a commercial or social responsibility context). The relevant Corporate Responsibility Department must approve, in writing, all donations made on Millicom’s behalf, regardless of where the initiative originated. The Ethics & Compliance Department must review and approve all proposed sponsorships and donations, and Legal must approve all agreements related to sponsorships and donations. Sponsorships and donations must be made with a legitimate purpose and may not be used to conceal bribes. For more information regarding sponsorships and donations, please consult the Sponsorships & Donations Policy.



Donations may include contributions of funds, goods, or services provided at no charge to a civic or charitable entity to support a charitable cause or to directly benefit a group or community.



9.0 Books and Records

- 9.1** Publicly held companies must maintain accurate books and records and implement adequate internal accounting controls. Employees must ensure that all respective transactions are clearly communicated to the Finance Department, so that the Finance Department registers them correctly in Millicom's books and records in reasonable detail (including services performed by TPIs, which must be supported by proper documentation, including details of the services provided and receipts for any reimbursable expenses).
- 9.2** Line managers and project owners must support the Finance Department's maintenance of Millicom's books and records by accurately communicating, in reasonable detail, the transactions and dispositions of the assets under their control to the Finance Department.
- 9.3** No entries shall be made in the books of accounts or in supporting documents (such as cash payment vouchers) which inaccurately or improperly describe any transactions. However, transactions of a confidential (but proper) nature, such as transactions related to redundancies, may be described in a general way, provided the line manager is aware of the full details, and they are made available to Millicom internal auditors and outside independent accountants. The company has a responsibility to provide full and accurate information to regulators and shareholders. Information that we provide regulators and our other public communications will be full, fair, accurate, timely, and understandable.
- 9.4** For more information about Millicom's accounting and finance policies and procedures, please contact the Finance Department.





10.0 Speak Up!

Reporting Concerns



- 10.1** Employees shall immediately report violations, suspected violations, or questions regarding this Policy or any applicable law or regulation (including concerns regarding accounting, internal controls, or auditing issues) 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.
- 10.2** 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.
- 10.3** 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.
- 10.4** 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.

11.0 Resources

- 11.1** Code of Conduct
- 11.2** Conflicts of Interest Policy
- 11.3** Gifts & Hospitality Policy
- 11.4** Government Official Interactions Procedure
- 11.5** Speak Up Policy
- 11.6** Sponsorships & Donations Policy
- 11.7** Third Party Management Policy
- 11.8** Anti-Money Laundering Policy



12.0 Revision History

Revision No.	Effective Date	Changes	Prepared By	Reviewed By
2.0	01 January 2018		Ethics & Compliance Department	HL Rogers - EVP Ethics & Compliance Salvador Escalon – EVP General Counsel
3.0	May 2019		Ethics & Compliance Department	HL Rogers – EVP and Chief Ethics & Compliance Officer
Latest Revision Approved By: CECO & Compliance Committee				