



# Millicom Sponsorships & Donations 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 strives to improve the communities and environments in which we work. This Policy sets forth a consistent process on Sponsorships and Donations (as defined below) where Millicom operates to ensure such activities are transparent and consistent with Millicom’s Code of Conduct and Anti-Corruption Policy. 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).

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**

Employee	Direct employees of Millicom and/or employees from all entities that Millicom owns or controls, including directors and contracted staff.
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	<div style="display: flex; align-items: flex-start;"> <div style="flex: 1;"> <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> <div style="flex: 1; background-color: #0072bc; color: white; padding: 10px; border-radius: 5px;"> <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> </div>
Business Partner	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.
Family member or close relative	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.



## Millicom Sponsorships & Donations Policy

<p>Merger, Acquisition, and Divestment</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="875 506 1463 636" style="border: 1px solid #0070C0; padding: 5px; background-color: #0070C0; color: white;"> <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="875 674 1463 1104" style="border: 1px solid #0070C0; padding: 5px; background-color: #0070C0; color: white;"> <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>
<p>Sponsorship</p>	<p>A monetary or in-kind contribution or the provisions of goods, commodities, or services to a corporation, group, or individual in staging a sporting, artistic, or social event, in return for advertisement of our brand, typically accompanied by the public display of Millicom brands or logos (e.g., mentioning Millicom or Tigo’s support during</p>



	the opening or closing of a conference by the recipient). Payments to for-profit entities for advertising purposes are considered Sponsorships under this Policy.
Donation	The giving or providing of anything of value (such as goods, funds, space, or services (see the definition of “Service Project” below) at no charge to a civic or charitable entity to support a charitable cause, benefit a social cause, serve the public interest, directly benefit a group or community, or otherwise generate goodwill on Millicom’s behalf.
Political Contribution	Any financial contribution or the provision of goods, commodities, or services on a cost-free or discounted basis to political parties, politicians, campaigns, candidates, or political causes. Millicom prohibits Employees from making or approving Political Contributions on the Company’s behalf or as a representative of the Company, regardless of level of authority.
Community Improvement	<p>A Donation made to benefit a community in which Millicom operates. Community Improvements may include Donations to Government and Politically Affiliated Entities, such as state-owned or state-controlled schools and hospitals.</p> <p>For purposes of this Policy, “Community Improvements” may include providing state-controlled schools or hospitals with internet</p>
Non-Governmental Organization (“NGO”)	A non-profit organization or entity not owned or controlled by any Government and Politically-Affiliated Entity or Government Official, which seeks Donations for the purpose of either assisting underprivileged or underserved individuals or groups or supporting charitable or community causes.
Service Project	Volunteer activities by Employees to benefit charities, local communities, or national causes for the public good. Service Projects may involve partnering with NGOs or local Government and Politically-Affiliated Entities, such as schools or hospitals. Service Projects involve volunteering by Millicom Employees to perform a community service—for instance, painting a school or cleaning a park.

## 2.0 General Principle

- 2.1** Do what’s right for the right reason and be a force for positive change. Sponsorships and Donations may represent real or perceived risk of corruption and we must protect the Company and its Employees from such risks. All Sponsorships and Donations, therefore, must be made with a legitimate purpose and for the right reasons. Proper procedures and internal authorizations are required in accordance with this Policy to ensure Employees do not engage in these transactions in an inappropriate or illegal manner. Millicom takes steps to ensure that Millicom resources, including Sponsorships and Donations, are not



used for improper purposes, such as influencing a Government Official. Employees must make all Sponsorships and Donations in compliance with Millicom’s Code of Conduct and Anti-Corruption Policy. Employees must never agree to a Sponsorship or to make a Donation for an improper purpose or in violation of any legal requirement, including global anti-corruption laws.

**3.0 Permissible Sponsorships and Donations**

**3.1** The Company may sponsor events or activities hosted, coordinated, or supported by Third Parties. Sponsorships include any financial contribution or contribution in-kind towards an event organized by a Third Party, in return for the opportunity to advertise the Company’s brands, including, without limitation, displaying Company-registered logos or publicizing our trade brands during an event (i.e., mentioning Millicom’s or Tigo’s support during the opening or closing of a conference).



**3.2 Categories of Permissible Sponsorships and Donations.** With proper approval, Employees may generally make the following categories of Sponsorships and Donations on Millicom’s behalf:

**3.2.1** Reasonable, in-kind Donations of goods (including Sponsorships paid via goods);

**3.2.2** Sponsorships and Donations permissible under local law, made in good faith, customary and reasonable under the circumstances, and which do not improperly benefit an individual person or Government Official, directly or indirectly; and

**3.2.3** Sponsorships and Donations that do not create the appearance of bribery or any other unethical conduct. Donations must only be given for charitable purposes, to benefit a social cause, to serve the public interest, or for the common good, and cannot be used to obtain or retain business, or in any other form that could, if misinterpreted, constitute or give the impression of bribery.

Do’s	
Make Donations on Millicom’s behalf for charitable purposes	
Make an in-kind Donation on Millicom’s behalf to an NGO following a natural disaster	
Make approved Sponsorships and Donations payments by check, wire transfer, or MFS	



- 3.3** 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. If the Donation exceeds \$15,000 USD, the Donation Approval Form must be shared with the Global Corporate Responsibility Department to ensure the Donation aligns with the Company’s Corporate Responsibility strategy. The Ethics & Compliance Department must review and approve all proposed Sponsorships and Donations to ensure compliance with this Policy and manage perception and reputation. The Legal Department must approve all agreements regarding Sponsorships and Donations, and monetary approvals must align with the relevant authority matrix.
- 3.4** Millicom Employees shall make payments related to approved Sponsorships and Donations by check or wire transfer, or through Millicom’s mobile financial services platform (MFS), and must provide all related receipts and invoices to the Finance Department.
- 3.5** Millicom Employees are free to make contributions acting as private citizens and using their own resources, provided there is no direct or indirect link to Millicom. Millicom is politically neutral, is not directly or indirectly affiliated with any political party, and does not provide services linked to any political messages. Millicom prohibits Employees from contributing Company funds, time, or assets to politicians, candidates for political office, political parties, or political action committees. Whenever Employees participate in the political process, they must make it clear that any political activity reflects an Employee’s individual beliefs, and not those of Millicom.

**4.0 Prohibited Sponsorships and Donations**






**4.1** Certain categories of Sponsorships and Donations are highly susceptible to misappropriation and improper recordkeeping. For further guidance regarding what constitutes an appropriate Sponsorship or Donation, please consult the Ethics & Compliance Department. The following Sponsorships and Donations are prohibited in all circumstances:




- 4.1.1** Sponsorships or Donations made in physical cash or currency;
- 4.1.2** Sponsorships or Donations made in gift cards;
- 4.1.3** Sponsorships of or Donations to fraternal, labor, or religious organizations that only serve the interests of their members;



- 4.1.4** Donations to an individual person, especially persons related to a Government Official or Government and Politically-Affiliated Entity, other than emergency Donations to victims and first responders;
- 4.1.5** Sponsorships of or Donations to Government and Politically-Affiliated Entities that could be perceived as an effort to obtain or retain business or that create the impression of bribery;
- 4.1.6** Sponsorships of or Donations to organizations that have been found to engage in corruption or other unethical conduct;
- 4.1.7** Political Contributions of any kind;
- 4.1.8** Sponsorships or Donations involving organizations or individuals that practice discrimination by race, creed, color, sex, national origin, sexual orientation, or any other personal attributes;
- 4.1.9** Sponsorships of or Donations to organizations whose goals are incompatible with the Company's corporate principles or which may cause damage to the Company; and
- 4.1.10** Sponsorships or Donations prohibited by law or regulation.

<b>Don'ts</b>			
Make Donations on Millicom's behalf to obtain business			
Make Political Contributions to a political campaign on Millicom's behalf			
Make Donations without approval from Corporate Responsibility and Ethics & Compliance			

**5.0 Emergency Donations**

- 5.1** Employees may make in-kind Donations (such as food, water, and first aid supplies, but also Company services and equipment) to an NGO, Government and Politically-Affiliated Entity, or directly to victims and first responders to meet humanitarian needs arising from a disaster that the public widely recognizes as impacting a broad spectrum of a community, regional, or national population, such as an earthquake, hurricane, or terrorist attack. 
- 5.2** Prior to making an emergency Donation, Employees must provide the completed Donation Approval Form to the Corporate Responsibility and Ethics & Compliance Departments for their review and written approval. If it is not possible for the





Employee to complete the Donation Approval Form prior to making the emergency Donation, the Employee may:

- 5.2.1** Obtain verbal approval from the Corporate Responsibility and Ethics & Compliance Departments prior to making the emergency Donation; and
- 5.2.2** Complete the Donation Approval Form as soon as possible after making the emergency Donation.

## **6.0 Contracts**

**6.1** All Sponsorship and Donation agreements must be in writing and include detailed terms and conditions as required by the Legal Department, including a specific description of the planned use for the funds.



**6.2** Sponsorship and Donation agreements should include the below sample clauses to protect Millicom from potential improper use of Sponsorships and Donations.

- 6.2.1** General compliance;
- 6.2.2** Audits rights;
- 6.2.3** Termination;
- 6.2.4** Government affiliations;
- 6.2.5** Material change of business;
- 6.2.6** Management structure or control clause;
- 6.2.7** Form of payment clause; and
- 6.2.8** Investigation cooperation.

**6.3** If a recipient refuses to execute a contract because of the inclusion of one of the above clauses that is relevant to the Sponsorship or Donation, the recipient cannot receive a Donation or Sponsorship of any kind from the Company.

## **7.0 Recordkeeping**

**7.1** The Legal, Corporate Responsibility, Marketing, and Finance Departments must keep all original documents related to Sponsorships and Donations. If the Company agrees to a Sponsorship or makes a Donation from another department or a regional or global office, the applicable office must retain the original documents. Millicom shall retain all completed forms, written approvals or rejections, contracts, confirmations, and other relevant records associated with Sponsorships and Donations for no less than five years.





**7.2** Internal Audit and external auditors may audit these records periodically.

## **8.0 Books and Records**

**8.1** Employees must ensure that all transactions made pursuant to this Policy are made in a timely manner and clearly communicated to the Finance Department, so that the Finance Department registers them correctly in Millicom's books and records in reasonable detail.



**8.2** Any Sponsorship or Donation must be accompanied by a written memorandum, letter, agreement, or contract.

**8.3** For more information about Millicom's accounting and finance policies and procedures, please contact the Finance Department.

## **9.0 Exceptions**

**9.1** The Chief Ethics & Compliance Officer must approve in writing, any exception to this Policy.

**9.2** Millicom shall retain a record of any approved exceptions to this Policy for a period of no less than five years.

## **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** Anti-Corruption Policy
- 11.3** Conflicts of Interest Policy
- 11.4** Gifts & Hospitality Policy
- 11.5** Government Official Interactions Procedure
- 11.6** Speak Up 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 Chief Ethics & Compliance Officer Salvador Escalon – EVP General Counsel Rachel Samren – EVP Chief External Affairs Officer
3.0	May 2019		Ethics & Compliance Department	HL Rogers – EVP and Chief Ethics & Compliance Officer
<b>Latest Revision Approved By: CECO and Compliance Committee</b>				



### Sponsorship Approval Form

Sponsorship	
Description of Event:	
Value and Payment Method:	
Purpose/Occasion relating to the Sponsorship (What will the Recipient use the contribution for?)	
Date of the Event to be Sponsored: DD/MM/YYYY	
How did the Sponsorship request originate (e.g., internally by Employees or externally with a Third Party)?	
Please describe what the Company will receive in return for the Sponsorship.	

Sponsorship Recipient	
Recipient Name and Contact Details:	
Recipient Title/Position:	
Recipient's Employer Details (including address):	
Has the Recipient received other Sponsorship(s) from the Company within the past year?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please describe the prior Sponsorship(s).	
Is the Recipient a Government Official or Government and Politically-Affiliated Entity?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide full details.	
Will any Government Official or Government and Politically-Affiliated Entity benefit from the Sponsorship, directly or indirectly?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide full details.	



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Does the Recipient or the Recipient's Employer have any business or business-related decision pending (e.g., a contract, application, tender, approval, license, permit, etc.) with the Company?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide full details regarding the pending business.	
Are you aware of any Millicom competitor or Supplier sponsoring this event?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide full details.	
Please describe the proposed Sponsorship agreement or transaction (e.g., how Millicom will make the Sponsorship in an open and transparent way).	

### Employee Information

Name of Employee Completing Form:
Title or Position:
Entity/Business Unit/Product Line:
Region/Country:
Signature:

### Review & Approval

<b>Ethics &amp; Compliance</b>	Signature:	Name:	Approval Date: DD/MM/YYYY
<b>Marketing</b>	Signature:	Name:	Approval Date: DD/MM/YYYY
<b>External Affairs</b>	Signature:	Name:	Approval Date: DD/MM/YYYY
<b>Legal</b>	Signature:	Name:	Approval Date: DD/MM/YYYY

### Accounting Registry Disclosure

For financial or accounting records, all sponsorship must be registered in the following account: 61010115 Events and Promotions – Sponsorship – “Sponsorship”
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### Donation Approval Form

Donation
Name of the Donation:
Value* and Payment Method:
Purpose of the Donation (What will the Recipient use the contribution for?)
Date of the Donation: DD/MM/YYYY
How did the Donation request originate (e.g., internally by Employees or externally with a Third Party)?
Please list the names of any other Employees participating in the Donation:

\*For Donations exceeding \$15,000 USD in value, please complete the Strategic Donations section attached to this Form.

Donation Recipient	
Recipient Name (organization or group):	
Recipient Contact Information (name, title, phone number):	
Describe the nature and purpose of the Recipient's organization or group.	
Does the Recipient have any relationship with a Government Official or Government and Politically-Affiliated Entity?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide full details.	
Will any Government Official or Government and Politically-Affiliated Entity benefit from the Donation, directly or indirectly?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide full details.	
Does the Recipient or the Recipient's Employer have any business or business-related decision pending (e.g., a contract, application, tender, approval, license, permit, etc.) with the Company?	<input type="checkbox"/> Yes <input type="checkbox"/> No



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If yes, please provide full details regarding the pending business.	
Are you aware of any Millicom competitor or Supplier donating to this event or cause?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please provide full details.	
Has the Recipient received other Donation(s) from the Company within the past year?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please describe the prior Donation(s), including the value and date received.	
Please describe the proposed Donation agreement or transaction (e.g., how Millicom will make the Donation in an open and transparent way).	

Employee Information
Name of Employee Completing Form:
Title or Position:
Entity/Business Unit/Product Line:
Region/Country:
Signature:

Review & Approval			
<b>Ethics &amp; Compliance</b>	Signature:	Name:	Approval Date: DD/MM/YYYY
<b>Corporate Responsibility</b>	Signature:	Name:	Approval Date: DD/MM/YYYY
<b>Legal</b>	Signature:	Name:	Approval Date: DD/MM/YYYY
<b>Global Corporate Responsibility**</b>	Signature:	Name:	Approval Date: DD/MM/YYYY

Accounting Registry Disclosure
For financial or accounting records, all donations must be registered in the following account: 61090110 Corporate Social Responsibility é "Corporate social responsibility & Donations"

\*\*For Donations exceeding \$15,000 USD in value.

**Please attach to your completed form: (1) a copy of the response letter that will accompany the Donation; and (2) a copy of the letter from the Recipient requesting the Donation.**



## Millicom Sponsorships & Donations Policy

### Strategic Donations (over \$15,000 USD)

Note: The below information is for notification purposes only. Millicom requires the Global Corporate Responsibility Department to review and approve any Donations valued over \$15,000 USD to ensure alignment with our Company strategy on social investment.

Other Individuals or Entities	
Will any other individuals or entities (including Third Parties) fund this project?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, please list the names of the individuals or entities.	
If yes, please indicate the main investor and provide the estimated investment % (if possible) of each individual or entity funding the project.	
Name _____	Estimated Investment (%) _____
Name _____	Estimated Investment (%) _____
Strategic Fit	
Please explain how this project utilizes technology.	
Please explain how the project relates to Millicom's organization or its products.	
What are the primary topic areas of the project (e.g., education, health, etc.)?	
Who are the primary beneficiaries of the project?	
How does the project support key policies of the local government?	
Performance	
What is this project trying to achieve?	
How will the project contribute to Millicom's business KPIs? Please provide targets.	
Brand Value	
Government Relations	





## Millicom Sponsorships & Donations Policy

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Employer Branding	
Corporate Communications	
How will the impact of the project be measured?	