



# Millicom Speak Up Policy





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**Policy Statement**

At Millicom, we are committed to doing business the right way, so that we can be a force for positive change everywhere we operate. Millicom is committed to the highest possible standards of transparency, honesty, and accountability. 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. Millicom expects Employees and third parties that have serious doubts or concerns about wrongdoings to come forward and voice those concerns, in order to resolve their doubts.

“Wrongdoing” includes any conduct or behavior that is or could be considered contrary to Millicom’s Code of Conduct, policies and procedures, legal requirements, or other ethical considerations.

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, as well as directors and contracted staff.
Reporter	Any person—Employee or non-Employee—who raises a suspicion or concern of wrongdoing at Millicom through any communication channel defined in the “Speak Up – Reporting Concerns” section of this Policy.

**2.0 General Principle**

**2.1** Whistleblower protection is integral to fostering transparency, promoting integrity, and detecting misconduct. Millicom’s Code of Conduct and this Policy require Employees and Third Parties to report in good faith any wrongdoing they discover or learn about during the course of their work with Millicom. You can use any communication channel listed in the “Speak Up – Reporting Concerns” section of this Policy to make a report.



### 3.0 Non-Retaliation

**3.1** Millicom recognizes the value Reporters bring to an effective compliance program. The Company strictly prohibits retaliation against any Reporter who raises a concern in good faith. Millicom considers retaliating against a Reporter who raises a concern in good faith a serious disciplinary offense. Retaliation may lead to disciplinary action, up to and including termination of employment (for Employees) or termination of the relationship with Millicom (for third parties).

**3.2** Good faith reporting is critical to an effective compliance program. To be clear, a person can make a good faith report that results in an unsubstantiated finding. The role of the Reporter is to report conduct that may violate our Code of Conduct. However, bad faith allegations can undermine Millicom’s culture of integrity. Making a deliberately false or malicious allegations may result in disciplinary action, up to and including termination of employment (for Employees) or termination of the relationship with Millicom (for third parties).

Reporting in “good faith” means providing all the information you know and believe to be true.

### 4.0 Confidentiality and Data Privacy

**4.1** Millicom will respect the confidentiality of any concern received, if the Reporter requests anonymity and it is legally permitted to do so in their location.

**4.2** Once a Reporter raises a concern, Millicom will disclose their identity only to those in charge of the investigation. The investigating team will make every effort to respect confidentiality and will prevent any sort of retaliation against good-faith Reporters.

**4.3** The Company may collect Employee information as part of an investigation, including Reporter information as well as information related to the reported party. Millicom is committed to safeguarding the privacy, confidentiality, and security of data that Employees entrust to the Company. Millicom collects and uses personal information only for lawful purposes and complies with applicable laws when transferring personal information across international borders. Millicom limits access to information collected to the strict minimum

<b>Do's</b>			
Report concerns of wrongdoing through the proper communication channels (as described in Section 5.0)			
Provide all relevant information to investigators			
Encourage other Employees to speak up			

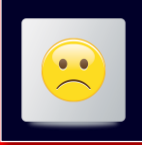



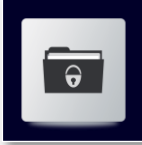


necessary and prevents anyone from accessing any such information without authorization.

**5.0 Speak Up - Reporting Concerns**

**5.1** 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. Employees may also 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.

**5.2** Contact information for Ethics & Compliance resources, country-specific numbers for Millicom’s reporting service, and links to make an online Ethics Line report are available via the Ethics & Compliance section of the Millicom website and intranet sites.

<b>Don'ts</b>	
	 
Retaliate against a Reporter raising a concern in good faith	
Refuse to participate in investigations	
Discuss confidential information with other Employees	

**6.0 Response**

**6.1** Millicom will respond to concerns raised under this Policy. Managers must escalate Code of Conduct issues to Ethics & Compliance and/or HR immediately upon being made aware of a concern. Managers are not expected to conduct an initial inquiry but rather cooperate with the Company investigator leading the investigation. The Company will conduct an initial inquiry to assess the merits of a concern. If appropriate, the Company will then decide which area (such as Human Resources, Legal, Finance, or Ethics & Compliance) can best address the concern. If an investigation is appropriate, a qualified individual will investigate the matter.

**6.2** When the Reporter uses the Speak Up line and provides a contact email address, Millicom will notify the Reporter within three business days that the Company has



received the concern. At this time, the Company may also request additional information from the Reporter. When feasible, Millicom may provide an estimate of how long it will take the Company to provide an update or final response regarding the investigation.

**6.3** If necessary, Millicom will seek further information from the Reporter throughout the investigation. This will depend on the nature of the matter raised, the potential difficulties involved, and the clarity of the information the Reporter provided.

**6.4** For further information, please consult the Millicom Global Investigations Policy.

**7.0 Resources**

**7.1** Code of Conduct

**7.2** Compliance Strategic Response (CSR) intranet resource page

**7.3** Millicom Global Investigations Policy

**8.0 Revision History**

Revision No.	Effective Date	Changes	Prepared By	Reviewed By
2.0	January 2018		Ethics & Compliance Department	HL Rogers - EVP Chief Ethics & Compliance Officer Susy Bobenrieth – EVP Chief Human Resources Officer
3.0	May 2019		Ethics & Compliance Department	HL Rogers – EVP and Chief Ethics & Compliance Officer
4.0	November 2021		Ethics & Compliance Department	Alfredo Avila – Director, Compliance Strategic Response
<b>Latest Revision Approved By: CECO &amp; Compliance Committee</b>				