

Gifts & Hospitality Policy

2022

Legal, Ethics & Compliance

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		Policy Owner:	Gloria Salcedo Padula

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2 PURPOSE OF THE POLICY

We don't buy business and we can't be bought.

Millicom's success depends on us fostering relationships and doing business the right way. Appropriate Hospitalities with a clear business purpose are part of building relationships. However, these gestures must be based on sound business decisions and must never harm our business or negatively impact our reputation. This Policy helps us determine when it is appropriate to offer and accept Hospitalities and helps us mitigate corruption risks that unlawful Gifts and Hospitalities may carry. It is not meant to address Hospitalities between Employees, nor does it address every situation involving commercial courtesies.

Millicom has a Zero Gift Policy: We cannot receive Gifts from Third Parties or Government Officials and cannot give gifts to Third Parties or Government Officials.

Our Code of Conduct and all [Ethics and Compliance Policies](#) 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.

3 SCOPE AND APPLICABILITY

This Policy applies to all of us, regardless of our role or location. By all of us, we mean Employees and management of Millicom, Tigo, and other Millicom group companies (collectively, "Millicom" or the "Company"), including directors and contracted staff (collectively, "Employees"), Third Parties, and Business Partners.

We are responsible for reading – and following – this Policy. Millicom holds all Employees responsible for ensuring that their Family Members (as defined below) comply with this Policy as well.

If a government, business unit, or local operation places additional restrictions related to this policy, the stricter requirements must apply.

4 DEFINITIONS

Term	Definition
Business Partner	A Third Party that Millicom has an investment or business arrangement with, such as a co-shareholder in a joint venture or other joint business activity where the Business Partner may interact with Government Officials on Millicom's behalf, either indirectly or directly.
Company or Millicom	Millicom, Tigo operations, and other Millicom group companies.
Employee	Employees of the Company, as well as directors and contracted staff.
Family Member or Close Relative	A person's spouse; domestic partner; parent; child; sibling; cousin; grandparent; grandchild (or their spouse or domestic partner); or any other relative living in the same household, whether related by blood, marriage, or adoption.
Gadget	A single promotional item (with a company or product brand) of minimum value, such as a pen, t-shirt, notepad, mug, or calendar valued at a maximum of \$20.00 USD.
Gift	Any object or benefit for which the recipient does not pay.
Government Official	<div style="display: flex; align-items: flex-start;"> <div style="flex: 1;"> <p>A Government Official can include:</p> <ul style="list-style-type: none"> • Directors, officers, or employees of a Government or Politically Affiliated Entity </div> <div style="flex: 1; background-color: #00728f; color: white; padding: 10px; border: 1px solid #00728f;"> <p>For purposes of this Policy, "Government Officials" may include Family Members or Close Relatives of anyone described in this section.</p> </div> </div>

	<ul style="list-style-type: none"> • People acting in an official capacity for a Government or Politically Affiliated Entity Candidates for political office • Candidates for political office 	<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>
<p>Government or 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^[SEP] <p>Any public international organization, such as the United Nations, the World Bank, the Organization of the American States, the Central American Bank for Economic Integration, and the International Monetary Fund Any recognized traditional or tribal council, governing body, or authority, or any recognized traditional or royal family.</p>	
<p>Hospitality</p>	<p>Any occasion or service for the entertainment of guests where the individual or entity providing the benefit is present and participates, even virtually.</p>	
<p>Legitimate Business Purpose</p>	<p>The requirement that any transaction, activity, or expense must be lawful, consistent with this Policy, and aligned with appropriate business strategy.</p>	
<p>Supplier</p>	<p>Any supplier, vendor, contractor, distributor, consultant, or other Third-Party providing goods, services, or supplies (including software) to support Millicom operations.</p>	
<p>Third Party</p>	<p>Any Millicom Third Party Intermediary (“TPI”), Business Partner, or other Supplier, consultant, and any other individual with whom Millicom interacts.</p>	
<p>TPI</p>	<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>	<p>Examples of TPIs include, but are not limited to:</p> <ul style="list-style-type: none"> • Law firms; • Custom Agencies; and • HR service companies.

5 POLICY

5.1 Prohibited Activities

- 5.1.1 Millicom doesn't buy business—we earn it by pursuing excellence in everything we do, including the products and services we provide. Millicom awards its business in the same way: on the merits of products and services.
- 5.1.2 Employees should never give or receive Gifts, other than Gadgets of minimum value, on Millicom's behalf or as part of their employment. If you want to give or receive several Gadgets to or from the same Third Party at once, the total value should not exceed \$20 USD.
- 5.1.3 Appropriate Hospitalities are intended to build goodwill between Millicom and current or prospective customers and others with whom we do business. However, we should never offer or accept Hospitalities in exchange for doing business. You must not provide Hospitality with the intent to improperly influence another person (including Government Officials), or in situations where the Hospitality could be perceived as improperly influencing or creating an obligation.

5.1.4 Hospitalities must not be:

- 5.1.4.1 Extravagant, lavish, or excessive, or outside the bounds of usual business standards or ordinary and appropriate business courtesies
- 5.1.4.2 Unreasonably frequent (taking place more than once per quarter from or to the same Third Party)
- 5.1.4.3 Given to or accepted from a Government Official (except subject to the exception process contained in this policy)
- 5.1.4.4 Illegal under local law
- 5.1.4.5 Against the recipient's own policies (it is each Employee's responsibility to know a recipient's policies and the applicable local laws)
- 5.1.4.6 Offensive, sexually oriented, or not in line with Millicom's commitment to mutual respect
- 5.1.4.7 Anything that could create an actual or potential conflict of interest, or even the appearance of one
- 5.1.4.8 Intended to unethically create a competitive advantage or influence pending negotiations

Not OK	
<p>Gifts offered or received</p>	
<p>Hospitality intended to influence a business decision</p>	
<p>Hospitality illegal under local law or against a Supplier's policies</p>	

5.1.5 Millicom Employees should never request or solicit any Hospitality from a Third Party.

5.2 Permitted Activities

- 5.2.1 In general, Millicom Employees may give or receive Hospitality only if:
 - 5.2.1.1 It is reasonable and proportionate in expense (valued under \$125 USD for Hospitality taking place in US or Europe, or under \$75 USD for Hospitality taking place in Latam)
 - 5.2.1.2 It legitimately promotes Millicom's business or capabilities
 - 5.2.1.3 It is consistent with generally accepted business practices, local customs, and local law
 - 5.2.1.4 It upholds Millicom's values and ethical standards
 - 5.2.1.5 It was not solicited or requested with the intent to improperly influence someone
 - 5.2.1.6 Employees obtain approval and properly disclose the Hospitality, as outlined in this Policy

- 5.2.2 **Disclosure Obligation.** All Employees must fill out the Hospitality Disclosure Form for any Hospitality they receive or give of a value greater than \$20. In the form, they must indicate the value of the Hospitality.
- 5.2.3 **Document Retention.** Ethics & Compliance will maintain a register of disclosed Hospitalitys. If an Employee pays for Hospitality outside of Millicom’s invoicing and billing system and wants to be reimbursed through the expense process, the Finance Department must confirm with the Ethics & Compliance Department that the Employee properly submitted the Hospitality Disclosure Form.
- 5.2.4 **Approvals.** Employees must obtain approval when providing or receiving Hospitality, in certain cases.
 - 5.2.4.1 **Offering or Receiving Hospitality.** If you are offering or receiving Hospitality, follow the guidance in the following chart:

Value (USD)	Process
\$0-20 per person	No approval or Hospitality Disclosure Form required.
\$21-\$125 per person for Hospitality taking place in US or Europe, or \$21-\$75 per person for Hospitality taking place in Latam	No approval required but must be reported via the Hospitality Disclosure Form.
Above \$125 per person for Hospitality taking place in US or Europe, or above \$75 per person for Hospitality taking place in Latam	Must be approved in advance by your Local Compliance Officer or the Global Compliance Director (depending on your employment location) and reported via the Hospitality Disclosure Form.

If any proposed and not extravagant Hospitality takes place in Tigo’s corporate offices/premises (e.g., cafeteria) you do not need to obtain approval or fill out a Hospitality Disclosure Form. Likewise, if any proposed and not extravagant Hospitality takes place at a Client or Vendor’s premises and is incidental to a business meeting, you do not need to obtain approval or fill out a Hospitality Disclosure Form.

If you don’t know the value of the Hospitality being offered to you, please mention this Policy to the Third Party who’s making the offer and inquire its value before accepting.

There might be sudden situations where you may not have time to obtain pre-approval before accepting or offering a Hospitality. In such scenarios, you can accept or offer the Hospitality, but must report it immediately via the Hospitality Disclosure Form. This specific section does not allow you to accept or offer Hospitality to Government Officials, given that this Policy prohibits it.

- 5.2.4.2 **Country-Specific Limits.** Each country may set a lower monetary limit for Hospitality. The Local Compliance Committee shall review and approve the limits on an annual basis. Please contact your Local Compliance Officer for your local Hospitality limit.

5.3 Ownership

The Global Compliance Director is the owner of this Policy and responsible for writing, reviewing, updating, communicating, monitoring, and enforcing this Policy.

5.4 Exceptions to this Policy

The VP Ethics & Compliance must provide written pre-approval for any exceptions to this Policy.

5.5 Speak Up!

Reporting Concerns

5.5.1 If you believe that you have seen something that just doesn't seem right, even if you don't have evidence for it, Speak Up. If you have a question, ask because it is better to resolve the issue than to let it linger. Raise your concerns, suspected violations, or questions in good faith 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. You can also raise a concern through the [Millicom Ethics Line](#), Millicom's external and independent reporting service, which is available twenty-four hours a day, seven days a week.

5.5.2 More information about Speak Up, 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.

5.5.3 All line managers are responsible of enforcing this Policy. They should also ensure that their employees comply with this Policy and provide them with access to the latest version of this Policy.

Millicom will take corrective action against anyone who retaliates against Employees who initiate or participate in Ethics & Compliance Department investigations.

Millicom handles all reports of misconduct confidentially to the extent practically and legally permissible. We thoroughly review and investigate each report of misconduct. Employees are required to cooperate in company investigations.

5.6 Example Scenarios and Q&A

Q: I want to invite an executive from a prospective client to a marketing event. Millicom would like to cover the expenses and travel costs. Is that ok?

A: *Because this Hospitality would likely be worth more than our Hospitality limits, you must have approval from your Local Compliance Officer or Global Compliance Director, depending on your location, before offering it to the executive.*

Q: I want to invite a Government Official to a reception where expensive wine and appetizers will be served. A lot of other guests will be there, so I'm not doing anything special for this Government Official. Can I invite him?

A: *You cannot offer any Hospitality to a Government Official, so you cannot invite the official to this event, unless you first secure an exception to this Policy.*

Q&A



<p>Is Hospitality between Employees covered by the Policy?</p>	<p>No. The Policy only applies to Hospitality provided or received externally. For guidance on Employee Gifts or Hospitality, please refer to the Employee Handbook.</p>
<p>How do I determine the value of Hospitality?</p>	<p>If you do not know the cost, you should use the fair market value of the Hospitality.</p>
<p>Does the Gifts & Hospitality Policy apply if an Employee pays for Hospitality and does not expense it back to Millicom?</p>	<p>Yes. The rules apply whether or not the Employee seeks reimbursement from Millicom.</p>
<p>Is Hospitality provided to or received from a TPI covered by this Policy?</p>	<p>Yes. This Policy applies to any Hospitality received from or provided to an external party, including a Supplier, TPI, or any other Third Party.</p>
<p>What should I do if I receive an unsolicited Gift?</p>	<p>Please follow these steps:</p> <ol style="list-style-type: none"> 1. If possible, return the Gift to the sender and explain that we have a zero-gift policy 2. If return is not possible, provide the Gift to your local HR Department for an internal raffle, and explain to the sender that we have a zero-gift policy 3. Disclose the receipt of the Gift through the Gifts Disclosure Form

6 ENFORCEMENT AND NON-COMPLIANCE

Employees who violate this Policy may be subject to corrective actions, up to and including termination of employment. Everyone should report any suspected violations of this Policy to their Line Manager or the Policy Owner.

7 MONITORING AND COMPLIANCE

The Policy Owner is responsible for ensuring compliance with this Policy and defining applicable metrics to track and report on compliance (and non-compliance) to the Policy Committee.