

Millicom Anti-Corruption Policy



Table of Contents

Policy Statement 2

1.0 Definitions 2

2.0 General Principle..... 5

3.0 Roles and Responsibilities 5

4.0 Key Provisions of Anti-Corruption Laws 6

5.0 Facilitating and Extortion Payments..... 7

6.0 Gifts, Hospitality and Other Expenses 7

7.0 Political Contributions 8

8.0 Sponsorships and Donations..... 9

9.0 Books and Records 9

10.0 Q&A.....9

11.0 Speak Up!..... 11
Reporting Concerns.....11

12.0 Resources..... 11

13.0 Revision History 12

Policy Statement

At Millicom, we are committed to doing business ethically, so that 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. This Policy applies to all of us,¹ regardless of our role or location. 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.

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.

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

1.0 Definitions

Agent	An independent Third Party engaged by Millicom on a contractual basis to distribute products and services to Millicom’s customer base.
Bribery	Bribery includes both of the following: <ul style="list-style-type: none">• Active bribery: Offering, promising, or giving anything of value to another person, either directly or indirectly, with the intent to induce them to act improperly in the performance of their duties• Passive bribery: Requesting, agreeing to receive, or accepting anything of value from another person, directly or indirectly, with the intent to induce you to act improperly in the performance of your duties
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.

¹ 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.



Millicom Anti-Corruption Policy

Covered Entities	For purposes of this Policy, Covered Entities include TPIs and Business Partners.
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 (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	<p>A Government Official can include:</p> <ul style="list-style-type: none"> • Directors, officers, or employees of a Government or Politically Affiliated Entity • People acting in an official capacity for a Government or Politically Affiliated Entity • Candidates for political office <div data-bbox="914 951 1498 1081" 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="914 1119 1498 1549" 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>
Government or Politically Affiliated Entity	<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



	<ul style="list-style-type: none"> 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
Hospitality	Any occasion or service for the entertainment of guests where the individual or entity providing the benefit is present and participates, even virtually.
Improper Payment	<p>Giving or receiving inducements or anything of value for any reason, to:</p> <ul style="list-style-type: none"> Improperly influence someone’s judgment about Millicom’s (or another company’s) products and services Gain an improper advantage when selling our goods and services, conducting business transactions, or representing Millicom Improperly influence a Government Official’s use of discretionary authority <div data-bbox="912 571 1500 1194" style="border: 1px solid #0070C0; padding: 5px;"> <p>Improper Payments may include:</p> <ul style="list-style-type: none"> Bribery Improper donations, sponsorships, or contributions of Millicom funds or assets to political parties, party 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 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>
Supplier	Any supplier, vendor, contractor, distributor, consultant, or other Third-Party providing goods, services, or supplies (including software) to support Millicom operations.
Third Party	Any Millicom Third Party Intermediary (“TPI”), Business Partner, or other Supplier.
TPI	<p>A Third Party that interfaces on Millicom’s behalf, indirectly or directly, with Government Officials. This may include Suppliers, consultants, and other service providers.</p> <div data-bbox="912 1520 1500 1709" style="border: 1px solid #0070C0; padding: 5px;"> <p>Examples of TPIs include:</p> <ul style="list-style-type: none"> Law firms Custom agencies HR service companies </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, Agents, and Covered Entities must follow all local anti-corruption laws wherever we operate, as well as laws with international reach, such as the U.S. Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act (“UKBA”), and anti-corruption standards and best practices.

3.0 Roles and Responsibilities

- 3.1 Employees.** Employees must be aware of and comply with 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 appropriate reporting channel as detailed in the “Speak Up!” section of this policy. Violations of the Code or this Policy will result in disciplinary action, up to and including dismissal. If the violation involves potential illegal behavior, Millicom reserves the right to report it to the appropriate legal authorities.
- 3.2 Covered Entities.** Covered Entities and Agents must comply with the Millicom Supplier Code of Conduct, the Millicom Code of Conduct, and their obligations under this Policy. Covered Entities and Agents must report violations, suspected violations, or questions regarding this Policy to the Local Compliance Officers (for Covered Entities and Agents in the countries of our Tigo Operations) or any member of the Global Ethics and Compliance Department (for all other Covered Entities and Agents).
- 3.3 Ethics & Compliance Department.** Local Compliance Officers (for local Covered Entities in the countries of our Tigo Operations) or the Global Compliance Director (for all other Covered Entities) must approve the respective Covered Entities before entering into agreements with them, as laid out in 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			



- 3.4 Finance Department.** The Finance Department must ensure that books, records, and accounts 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 follow this Policy. Line managers must also ensure that TPIs and Business Partners they work with have been vetted and approved according to the [Third-Party Management Policy](#).

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 a Government Official’s 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 Covered Entities. The FCPA and UKBA prohibit Improper Payments, whether made directly from Millicom or through Covered Entities and Agents. Millicom could face liability based upon Improper Payments made through its Covered Entities and Agents. As a result, the Ethics and Compliance Department conducts reasonable, risk-based due diligence on Covered Entities. TPIs undergo regular Third Party Due Diligence (TPDD), with the added approval from either Local Compliance Officers (TPIs in the countries of our Tigo Operations), or Global Compliance Director (all other TPIs). Business Partners fall outside the TPDD scope. Prior to engaging Business Partners, at the discretion of the Global Compliance Director, the Company may hire a third-party consultant to conduct an enhanced due diligence on the target. This decision will be based on risks identified during the initial screening process, the value of the commercial relationship, or types of products or services to be acquired, among other factors. This enhanced due diligence could otherwise be performed internally by members of the Global Ethics and Compliance Department, consistent with the Business Partner’s risk

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			



profile. For more information on treatment of Covered Entities, please consult the [Third-Party Management Policy](#).

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, such as obtaining permits or licenses.
- 5.2 Facilitating payments may be legal in some locations, but no matter where we work, Millicom strictly prohibits facilitating payments. If you receive a request from a Government Official for a facilitating payment, immediately contact your line manager and 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 not facilitating payments. The safety of Employees (and anyone working on Millicom’s behalf) is our number-one priority. If circumstances require making extortion payments, Employees (or anyone working on Millicom’s behalf) must properly document and record them in the Company’s books and records.
- 5.4 Millicom Employees must report, in writing, all incidents involving extortion payments (whether paid or not) to their line manager and the Ethics & Compliance Department. Covered Entities should speak to a resource at their own organization and Millicom’s Ethics and Compliance Department.

6.0 Gifts, Hospitality, and Other Expenses

- 6.1 The exchange of Gifts, meals, and Hospitality may be acceptable as a customary part of conducting business and building relationships. However, Employees must never offer Gifts, meals, or other Hospitality to obtain any improper benefit. Similarly, Employees must not give or receive Gifts, other than Gadgets of minimal value, on Millicom’s behalf or as part of their employment with Millicom. Under exceptional circumstances, Employees may make a formal request to the VP Ethics & Compliance before giving or receiving a Gift.
- 6.2 For Hospitality purposes, Millicom Employees may give or receive Hospitality only if:
 - It is reasonable and proportionate in expense, as established in the [Gifts and Hospitality Policy](#)
 - It promotes Millicom’s business or capabilities
 - It is consistent with generally accepted business practices, in accordance with local customs and local law



- It upholds Millicom’s values and ethical standards
- It was not solicited or requested

6.3 Before offering or accepting Hospitality, we must ensure there is a clear business purpose for doing so. We should also be certain that an outside party could not interpret the Hospitality as an attempt to improperly influence a business decision or gain an improper business advantage.

6.4 Our interactions with Government Officials carry greater risk because of their potential influence over official actions. This is why Hospitality to Government Officials is prohibited. Employees must seek an exception from the VP Ethics & Compliance before offering or providing any hospitality to Government Officials. Millicom will not pay for the travel expenses of a Government Official’s family members or for side trips unrelated to Millicom business.

6.5 For further guidance regarding what constitutes appropriate hospitality, please consult the [Gifts & Hospitality Policy](#), your line manager, or the Ethics & Compliance Department.

6.6 Hiring Former or Current Government Officials. In situations where the Company wishes to hire a Government Official as an Employee or contractor, a period of one year must have passed between the individual leaving their position as a Government Official and starting to work for Millicom. The VP Ethics & Compliance must approve all such engagements and may make exceptions to this policy under specific circumstances.

7.0 Political Contributions

7.1 Millicom is politically neutral and is not directly or indirectly affiliated with any political party. In accordance with Millicom’s Policy for Law Enforcement Assistance and “Major Events,” all political messages that derive from any of Millicom’s services do not reflect in any way the opinion of Millicom.

7.2 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 their level of authority. Consistent with the [Code of Conduct](#) and the [Sponsorships &](#)

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



[Donations Policy](#), Employees must make it clear that any political activity reflects their individual beliefs and not Millicom's.

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, sponsorships and donations must have a legitimate purpose, should never be used to secure a business advantage, and should be approved in accordance with 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 Like all publicly held companies, Millicom needs to maintain accurate books and records and implement adequate internal accounting controls. Employees must clearly communicate all transactions to the Finance Department, so that the Finance Department registers them correctly in Millicom's books and records in reasonable detail. This includes services performed by TPAs, which must be supported by proper documentation, with 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 We must never make entries in books of accounts or in supporting documents (such as cash payment vouchers) that 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 your line manager is aware of the full details and they are made available to Millicom internal auditors and outside independent accountants.
- 9.4 For more information about Millicom's accounting and finance policies and procedures, please contact the Finance Department.



10.0 Q&A

Q: I am working with a subcontractor on a new Millicom facility, but we need to get final approval from the local government before the facility can open. The subcontractor has



suggested that we offer the local building inspector a “tip” in cash to make sure we get his approval. The subcontractor says he will offer the money himself, so I don’t have to be involved. Can I let him do that?

A: No, you can’t! This is a bribe. We can never allow a third party to offer a bribe on our behalf. If you believe that a third party is considering offering a bribe on Millicom’s behalf, report it immediately.

Q: Millicom wants to purchase wireless spectrum in a country where the Company isn’t currently doing business. I’m hiring an intermediary to work on Millicom’s behalf in the country. The intermediary told me, “I always get the job done for my clients, no matter what it takes,” and he has mentioned that he is planning to take an important government official out to dinner to talk about Millicom. We really need to purchase this wireless spectrum—can I let him do this and just act like I don’t know about it?

A: No, not at all. Even if you pretend you don’t know about it, Millicom can still be held responsible for this intermediary’s behavior. Instead, you should speak to your manager about your concerns as soon as possible.

Q: I have hired an intermediary to negotiate access rates with a state-owned telecommunications carrier in another country. She has told me that it’s customary to offer gifts to government officials at the conclusion of deals like this. How should I respond?

A: You should tell her that Millicom has a strict policy of never offering gifts to government officials. In addition, we never offer any gift or hospitality to anyone if it could be seen as an attempt to influence a business deal.



11.0 Speak Up!

Reporting Concerns



11.1 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.

11.2 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.

11.3 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.

12.0 Resources

12.1 [Code of Conduct](#)

12.2 [Conflicts of Interest Policy](#)

12.3 [Gifts & Hospitality Policy](#)

12.3 [Government Interactions Policy](#)

12.4 [Speak Up Policy](#)

12.5 [Sponsorships & Donations Policy](#)

12.6 [Third Party Management Policy](#)

12.7 [Global Anti Money Laundering and Counter Terrorist Financing Policy](#)



13.0 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
4.0	December 2021		Ethics & Compliance Department	Salvador Escalon – EVP Legal & Compliance Officer
Latest Revision Approved By: EVP Legal & Compliance Officer and Compliance Committee				