

SOCIAL MEDIA POLICY



July 29th, 2020

Social Media Policy

Frequently Asked Questions

Q: What is the main purpose of Company's Social Media Policy?

Company wants to ensure that employees understand their obligations when using social media and are informed of the importance of managing the risks associated with such use that may impact Company's reputation and/or the safety of its employees, and that may result in a violation of Company's policies or relevant procedures, including, but not limited to, Employee's Handbook, the Code of Conduct and Millicom Communication Guidelines. Company's Social Media Policy (the "Policy") aims for the mutual protection of Company and its employees, and is not intended to prevent, discourage, or unduly limit employees' expression of personal opinions or online activities.

Q: Can I use social media to share my personal views?

Everyone is entitled to use social media and have social media accounts. In this case, employees that express their personal opinions through social media on matters related to Company's business, must make it clear to readers in any communication discussing or mentioning the Company that **the views expressed are their own and do not represent the views of the Company.**

Q: What can I post and repost as a Company employee?

Employees are not allowed to individually **post** through social media any content that includes Company's logos or other Company's intellectual property, information about Company's vendors or customers or other confidential information, pictures or videos of Company's premises or Company's visitors that may result in any violation of confidentiality and privacy obligations (*Please refer to additional guidelines for posting pictures and videos below*).

Notwithstanding the foregoing, it is acceptable for employees to **repost** unmodified posts from the Company that have been uploaded in Company's social media accounts, including those posts that display Company's logos.

Employees must be aware that for reposting Company's authorized posts, they must follow at all times the Policy's Principles. For instance, employee's comments on any reposting, must clarify that **the views expressed are their own and do not represent the views of the Company.**

Additionally, employees must be aware that unless they are authorized by Company, employees are not allowed to respond to any social media posts by third parties to clarify any information, even if it is intended to defend the brand or Company's reputation.

Q: Can I post Company's events pictures or videos on my personal social media accounts?

In certain circumstances, it is permissible for employees to share Company's events pictures or videos on their own personal social media accounts provided that such content does not violate any confidential, proprietary or privacy obligations.

Before posting a picture or a video of a Company's event on your own social media accounts, please make sure that you comply with the following: (i) obtain the prior written consent of those Company's colleagues that appear in the pictures or videos; (ii) do not post any pictures or videos that involve minors, unless you have their parents or legal representative's prior written consent; (iii) do not post any pictures or videos that include Company's or third-party's confidential or proprietary information that may be available at the Company's premises when you take the picture (e.g. pictures of Company's data centers; pictures that inadvertently show Company's presentations, meeting boards, projects, contracts, sales forecasts; pictures that include third-party visitors on the premises, among others). Finally, always make sure to share thoughtfully on your personal social media accounts any content that involves a Company's event and/or its colleagues.

Q: Can I post Company's events pictures or videos on my personal social media accounts, wearing clothing or accessories with Company's logo?

Yes, provided that you act with professionalism, respect the Company's brand, respect others, use good judgment about the content you post, clarify that any of your opinions *are your own* and follow the guidelines above for posting Company's events pictures and videos. Remember that anything you post in the internet is permanent and may have repercussions at a global scale.

Q: Are there any exceptions applicable to employees using social media?

The Policy clarifies that there are certain employees authorized to post on social media on behalf of Company. If, for example, a local operation decides that its GM should be posting on behalf of Company on social media, that would be acceptable under the current version of the Policy, because the GM is an authorized spokesperson by the local Communications team or the Corporate Communications team, as applicable. Authorized individuals will need to be aware and agree to comply with the relevant Communications Guidelines, which set forth both restrictions and recommendations for effective communications. The Communications Guidelines are published on the Employee Portal/Communications Community. Additionally, please refer to Company's External Communications Policy which designates Company's authorized spokespeople and includes Company's communications principles.

Q: What kind of disclaimers should I use when posting matters related to the Company?

Twitter bios are limited to 160 characters, so any disclaimer must be short. Suggestions include:
"Opinions are my own"

- Personal account
- Following / being followed ≠ endorsement
- This account is personal and only represents me
- Personal opinions
- The opinions of those who follow or follow me do not reflect my opinion
- Personal opinions that do not represent the point of view of my company
- This account reflects personal opinions only and does not represent my company.

Q: What can I do if I need to report any violation of the Policy?

Employees shall immediately report violations or suspected violations regarding the Policy directly to the Communications team, the Corporate Communications team, the Legal team or to any member of the Ethics & Compliance team as applicable to your country. Violations or suspected violations of the Policy may also be reported through the Company’s Ethics Line.

Q: Who can I contact if I have a question or concern about the Policy?

- Depending on the matter of concern covered by the Policy, please refer to the chart below to direct your questions or concerns to the applicable Business Unit(s) identified with ✓ (“BU”).
- Tigo and Zantel employees will contact the applicable local BU at each operation. Matters concerning the use of Millicom’s and Tigo’s brand, disclosure of Company’s confidential information and any local regulatory/government news will also be reviewed by the Corporate Communications team in HQ.
- Millicom employees will contact the applicable BU at HQ.

Subject	Comms Team	Marketing	Legal	Compliance	HR
Tigo Brand	✓	✓	✓		
General Questions	✓		✓		
Spokesperson/s	✓				
Pictures	✓	✓			
Sales/Promotions		✓			
Job Postings/Labor matters		✓			✓
Policy Violations	✓		✓	✓	
Disclosure of confidential information	✓		✓	✓	
Millicom Brand	✓	✓	✓		
Regulatory/Government News	✓		✓		

-END-