

Sponsorships & Donations Policy

2022

Legal, Ethics & Compliance

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2 PURPOSE OF THE POLICY

At Millicom, we are committed to making things happen the right way, 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](#) and that the risks that emerge from these activities are mitigated.

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.
Community Improvement	<p>A Donation made to benefit a community where Millicom operates. Community Improvements may include Donations to Government and Politically Affiliated Entities, such as state-owned or state-controlled schools and hospitals.</p> <div style="border: 1px solid #0070c0; background-color: #0070c0; color: white; padding: 5px; width: fit-content; margin-left: auto; margin-right: auto;"> <p>For purposes of this Policy, “Community Improvements” may include providing state-controlled schools or hospitals with internet access.</p> </div>
Company or Millicom	Millicom, Tigo operations, and other Millicom group companies.
Donation	<p>The discretionary giving or providing of anything of value (such as goods, funds, or services like data, minutes, sms messaging, wifi) at no charge to a civic or charitable entity in order to do any of the following:</p> <ul style="list-style-type: none"> • Support a charitable cause • Benefit a social cause • Serve the public interest • Directly benefit a group or community • Otherwise generate goodwill on Millicom’s behalf <p>Donations can be monetary or in kind.</p>
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.
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 • Candidates for political office <div style="background-color: #0070C0; color: white; padding: 10px; margin-top: 10px;"> <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 • 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.
Non-Governmental Organization (“NGO”)	A non-profit organization or entity not owned or controlled by any Government, Politically Affiliated Entity, or Government Official that seeks Donations to either assist underprivileged or underserved individuals or groups or support charitable or community causes.
Political Contribution	Any financial contribution or 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 their level of authority.
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.

Sponsorship	<p>Making a monetary or in-kind contribution or providing 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. This is typically accompanied by the public display of Millicom brands or logos (such as mentioning Millicom or Tigo's support during the opening or closing of a conference). Payments to for-profit entities for advertising purposes are considered Sponsorships under this Policy.</p> <p>The hiring of Brand Ambassadors or Influencers is not considered a Sponsorship. These individuals are Vendors and governed by the Supplier Due Diligence Policy.</p>
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, consultant, and any other individual with whom Millicom interacts.
TPI	<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 data-bbox="889 716 1479 905" style="background-color: #0070c0; color: white; padding: 10px;"> <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. </div>

5 POLICY

5.1 General Principle

Do what's right for the right reason and be a force for positive change. Sponsorships and Donations may present a real or perceived risk of corruption, and we must protect the Company and ourselves from such risks. Millicom will only make Sponsorships and Donations with a legitimate purpose and for the right reasons. The Company requires us to follow proper procedures and obtain internal authorizations in accordance with this Policy to ensure that we do not engage in these transactions inappropriately or illegally. Millicom takes steps to ensure that Company resources, including Sponsorships and Donations, are not used for improper purposes, such as influencing a Government Official. We must make all Sponsorships and Donations in compliance with Millicom's Code of Conduct and Anti-Corruption Policy. In addition, we 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.

6 PERMISSIBLE SPONSORSHIPS AND DONATIONS

- 6.1** The Company may sponsor events or activities hosted, coordinated, or supported by Third Parties. The Company may also sponsor professional organizations, such as sports teams. Sponsorships include any financial or in-kind contribution towards an event organized by a Third Party, in return for the opportunity to advertise the Company's brands. This could include displaying Company-registered logos or publicizing our trade brands during an event (such as mentioning Millicom's or Tigo's support during the opening or closing of a conference).
- 6.2 Categories of Permissible Sponsorships and Donations.** With proper approval, Employees may generally make the following categories of Sponsorships and Donations on Millicom's behalf:
- 6.2.1 Reasonable in-kind Donations and Sponsorships in accordance with fair market value.

- 6.2.2 Sponsorships and Donations that are permissible under local law, made in good faith, customary and reasonable under the circumstances, and that do not improperly benefit an individual person or Government Official, directly or indirectly.
- 6.2.3 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. They cannot be used to obtain or retain business, or in any other form that could constitute or give the impression of bribery.
- 6.2.4 Millicom will only make Sponsorships and Donations to reputable organizations or beneficiaries.

6.3 Approval Process for Sponsorships

All Sponsorships must be approved first by the Local Compliance Officer (for initiatives in the countries of our Tigo operations) or Global Compliance Director (for all other initiatives), and then by the Local or Global Marketing Department, or the Local or Global External Affairs Department, depending on the nature of the Sponsorship—that is, whether it is done in a commercial or social responsibility context.

6.4 Approval Process for Donations

All Donations must be approved first by the Local Compliance Officer (for initiatives in the countries of our Tigo operations) or Global Compliance Director (for all other initiatives), and then by the Local or Global Corporate Responsibility Department, depending on where the initiative is executed. If the Donation exceeds \$15,000 USD, the Donation Approval Form must be approved by the Director of Regulatory and Sustainability Affairs to ensure the Donation aligns with the Company’s Corporate Responsibility strategy. Tigo operations should provide at least 72-hour notice in order to process Donations that exceed \$15,000 USD.






6.5 The Role of the Local Legal Department and the Global Legal Department

The Local Legal Department (for initiatives in the countries of our Tigo operations), or Global Legal Department (for all other initiatives), must review all agreements regarding Sponsorships and Donations, and monetary approvals must align with the Company’s authority matrix.

6.6 Payment Methods

Millicom Employees must make payments related to approved Sponsorships and Donations by check or wire transfer, or through Millicom’s mobile financial services platform (MFS). You must provide all related receipts and invoices to the Finance Department.

6.7 Employee Contributions

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		

Millicom Employees are free to make contributions 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 political activities, they must make it clear that their actions and opinions reflect their individual beliefs, and not Millicom’s.

7 PROHIBITED SPONSORSHIPS AND DONATIONS

- 7.1 Certain categories of Sponsorships and Donations can be easily misappropriated and can lead to improper recordkeeping. While monetary Donations are allowed, they are not Millicom’s preferred vehicle for making donations and are highly discouraged.
- 7.2 For further guidance regarding what constitutes an appropriate Sponsorship or Donation, please consult the Local Compliance Officer (for initiatives in the countries of our Tigo operations), or Global Compliance Director (for all other initiatives). The following Sponsorships and Donations are prohibited in all circumstances:
 - 7.2.1 Sponsorships or Donations made in physical cash or currency
 - 7.2.2 Sponsorships or Donations made in gift cards
 - 7.2.3 Sponsorships of or Donations to fraternal, labor, or religious organizations that only serve the interests of their members
 - 7.2.4 Donations to an individual person, especially anyone related to a Government Official or Government and Politically Affiliated Entity, other than emergency Donations to victims and first responders
 - 7.2.5 Sponsorships of or Donations to Government and Politically Affiliated Entities that could be perceived as an effort to obtain or retain business or create the impression of bribery
 - 7.2.6 Sponsorships of or Donations to organizations that have engaged in corruption or other unethical conduct
 - 7.2.7 Political Contributions of any kind
 - 7.2.8 Sponsorships or Donations involving organizations or individuals that practice discrimination by race, creed, color, sex, national origin, sexual orientation, or any other personal attributes
 - 7.2.9 Sponsorships of or Donations to organizations whose goals are incompatible with the Company’s corporate principles or which may cause damage to the Company or its reputation
 - 7.2.10 Sponsorships or Donations prohibited by law or regulation
 - 7.2.11 Donations or Sponsorship agreement with an organization to gain favorable terms from that organization or its affiliates or connected parties in any business agreement.

Don'ts	
	
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	

8 EMERGENCY DONATIONS

- 8.1 The Company 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. Examples include earthquakes, hurricanes, or terrorist attacks.

- 8.2** Before 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 to complete the Donation Approval Form prior to making the emergency Donation, the Employee should do both of the following:
- 8.2.1 Obtain verbal approval from the Corporate Responsibility and Ethics & Compliance Departments before making the Donation
- 8.2.2 Complete the Donation Approval Form as soon as possible after making the Donation

9 AGREEMENTS

- 9.1** All Sponsorship and Donation agreements must be in writing. They should include detailed terms and conditions as required by the Legal Department, including a specific description of the planned use for the funds. For Sponsorships and Donations valued at or below USD \$500, and where a full Contract is not feasible, a proof or receipt must be signed.
- 9.2** To protect Millicom from potential improper use of Sponsorships and Donations, Sponsorship and Donation agreements should aim to include clauses that cover general compliance and termination rights, for instance.
- 9.3** If a potential recipient of a Sponsorship or Donation refuses to execute a contract because of Millicom's proposed protections, they cannot receive a Donation or Sponsorship of any kind from the Company.

10 RECORDKEEPING

- 10.1** The Legal, Corporate Responsibility, Marketing, and Finance Departments must keep their respective 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. Records of forms, approvals or rejections, contracts, confirmations, and other relevant records associated with Sponsorships and Donations must be retained for no less than five years.

11 BOOKS AND RECORDS

- 11.1** All transactions made pursuant to this Policy must be made in a clear, precise, and timely manner. The Finance Department must register any related transactions correctly in Millicom's books and records, having dedicated accounts for Sponsorships and Donations, respectively.
- 11.2** With the exception of the limitations delineated on clause 6.1, any Sponsorship and Donation must be accompanied by a written request, approved form, and written agreement. The Ethics & Compliance Department shall on a regular basis review adherence to this Policy by all the functions involved.
- 11.3** For more information about Millicom's accounting and finance policies and procedures, please contact the Finance Department.

12 EXCEPTIONS

12.1 Exceptions to this Policy

- 12.1.1 The Local Compliance Officer (for requests in the countries of our Tigo operations), or the Global Compliance Director (for all other requests), must approve any exception to this Policy in writing.
- 12.1.2 Millicom will retain a record of any approved exceptions to this Policy for no less than five years.

13 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.

14 SPEAK UP!

Reporting Concerns

- 14.1** 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.
- 14.2** 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.
- 14.3** 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