

Human Rights Policy

2023

External Affairs


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1 PURPOSE OF THE POLICY

Millicom has a longstanding commitment to human rights, as defined in the UN Guiding Principles for Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the International Bill of Human Rights and Children's Rights and Business Principles. In keeping with this commitment, we operate with transparency, engage with stakeholders, and promote responsiveness and accountability. We comply with laws and regulations that relate to our business, while seeking to honor the principles of internationally recognized human rights. We seek to ensure that we are not complicit in human rights abuses.

Millicom maintains global standards for human rights regarding the way we conduct business in the rapidly changing markets where we build digital highways. We will passionately innovate in order to empower people to advance and grow, while preserving high standards on human rights in our work, reflecting our values of integrity, trust and transparency. We will be ready to challenge the status quo when it may be at odds with our customers' well-being.

All of the markets in which Millicom and Tigo operate have ratified or signed UN human rights conventions, such as the International Covenant on Economic, Social and Cultural Rights (ICESCR) and the International Covenant on Civil and Political Rights (ICCPR), committing under international law to uphold rights such as freedom of expression and privacy. At Millicom, we believe it is necessary to ensure that these rights are protected equally online.

Millicom is committed to ensuring a balance between respecting local laws and national security interests, and protecting customers and their access to information.

Human Rights in the ICT Sector

At Millicom we are committed to protecting the human rights of all our stakeholders. We believe that the freedom to access information, the freedom to communicate and respect for privacy are essential rights for the development of our communities. The digital highways that we build and operate enable our customers to connect and communicate with one another. At its most basic level, the infrastructure we build and operate is part of a global platform which enables the ability to connect and communicate. Through our services and platforms, we make it possible for our users to hold and share opinions freely, to seek out the ideas of others and to communicate their own. To the extent permitted by applicable law, we respect and protect the freedom of expression of our users. We promote the right of our users to hold and freely share opinions without interference, and to access the full range of ideas and information. We seek to protect our users, particularly vulnerable populations such as children, from harmful content by providing tools and information, and by working with those dedicated to online safety. Below we outline the most material human rights for our company, while providing some detail around our commitments and efforts to safeguard our stakeholders from potential violations.

Privacy and Freedom of Expression

Millicom is committed to the protection of the rights to freedom of expression and privacy for all our customers, each of whom remains at the center of all we do. As a telecommunications company bound by local legal frameworks and national security regimes, we are subject to frequent government requests for customer data. While we must comply with lawful requests, we are committed to respecting and safeguarding every person's right to freedom of expression and privacy, which consistently rank as two of the most material human rights issues for our stakeholders. Since 2015, Millicom has produced an annual Law Enforcement Disclosure (LED) report in line with our desire to be as transparent as possible with our customers in how we handle government requests for their data, the challenges we face from time to time in dealing with government requests, and the manner in which we manage these challenges. We also have

Millicom's Group Guidelines for Law Enforcement Assistance (LEA) and Major Events (can be found [here](#) and is detailed further below) which provide a governance framework for dealing with risks related to this area.

Millicom is committed to safeguarding the privacy, confidentiality, and security of customer and employee information entrusted to us. Millicom collects and uses personal information only for lawful purposes and complies with laws applicable to the processing of such. Employees should limit access to customer and employee information to the strict minimum necessary and prevent unauthorized persons from accessing any such information. Employees are expected to comply with all Company policies, guidelines, and procedures concerning the use and protection of customer and employee information. More details on our Privacy Statement can be found [here](#).

Human Rights in the Workplace

Millicom respects the rights of our workers and recognizes that the way we treat our employees reflects our core values. We work to foster a positive work environment that treats employees and contractors with respect and dignity. As an employer, we strive to be a preferred place to work, to be respectful and supportive of our workforce, and to provide an inclusive culture. We believe the differing viewpoints that we each bring to the workplace challenge us collectively to think more broadly and allow us to better serve our customers. We realize that the world we serve is diverse in its social custom and cultural traditions, and we respect and embrace those differences. As a company doing business internationally, we seek to live up to the highest standards of ethics, integrity and responsibility in our own operations and with our suppliers. Our core values are reflected in our Global Code of Conduct.

Millicom does not tolerate the use of child, forced, indentured, or involuntary labor where we conduct business. We will only do business with others that support human rights and uphold labor laws. Millicom respects each employee's right to associate freely, to join or not join trade unions, to seek other forms of representation, and to voice concerns relating to employment conditions without fear of reprisal.

Diversity and Inclusion

Millicom is an equal opportunity employer and treats every applicant and employee equally and fairly. We are committed to paying competitive, fair and equitable wages. We base hiring, promotion, discipline, compensation, and termination decisions solely on merit, performance, and business considerations. We do not engage in or tolerate unlawful harassment or discrimination, consistent with applicable law, based on race, Ethnic origin, color, religion, national origin, gender, sexual orientation, gender identity, age, disability, citizenship, marital status or any other status protected by law.

Health and Safety and Environment

Millicom strives to provide a safe and healthy work environment for all employees by minimizing safety incidents everywhere we do business. Employees must refuse and immediately report any work that could be reasonably perceived to endanger the health or safety of any employee and/or any of the company installations or assets. Employees should also encourage others to stop any unsafe behavior. We are all responsible for employee safety. The use of drugs and alcohol restricts the ability to think clearly, make sound decisions, and act quickly, and therefore will not be tolerated. Millicom strictly prohibits substance abuse in the work environment, and illegal substance abuse at all times.

We all have a duty to protect the environment when at work and to contribute to the realization of the company's environmental targets for all operations to reduce adverse impacts on the environment. We recognize the threat that climate change poses to us and the communities we serve. We believe that climate change creates serious environmental issues and amplifies human rights concerns, especially for the world's most vulnerable populations. Our

technology can help lower emissions for both our company and our customers. We're using the power of our network to create a better, more environmentally sustainable world that can help limit the environmental and human rights concerns from climate change.

Millicom's environmental targets include the use of environmentally friendly technologies, the reduction of energy use and dependency on fossil fuels in offices and in our network, and recycling or reuse of electronic waste. We aim to protect the environment by promoting the sustainable use of natural resources and by complying with environmental legislation in the countries in which we operate. For more information on Millicom's health, safety, and environmental protection policies, please consult our Environment Policy, Health, Safety & Environment Manual, and Millicom Waste Management Guidelines. To address our own greenhouse gas (GHG) emissions, Millicom set a 2050 goal to be carbon neutral across our entire operations. As part of its Science Based Targets initiative (SBTi) commitments, Millicom has pledged to reducing absolute scope 1 and 2 GHG emissions by 50% by FY2030 and absolute scope 3 GHG emissions by 20% by FY2035, both from a FY2020 base year.

Supply Chain

Millicom takes issues relating to human rights and labor practices in our supply chain seriously. From its inception, Millicom has been committed to providing customers with the highest quality digital services and content. We have built close partnerships with third parties in order to reach our common goal of providing each of our customers with the Digital Lifestyle experience. Millicom expects all third parties to act ethically and in a manner consistent with Millicom's Supplier Code of Conduct (the "Code"). When hiring a third party, employees must take reasonable steps to ensure the third party is aware of the Code, has a reputation for integrity, and acts in a responsible manner consistent with the Code and customer focus. By holding our third parties to the highest ethical standards, we cultivate long-term relationships and foster trust with our customers. For more information regarding Millicom's expectations for third parties, please consult our ThirdParty Due Diligence Policy, Anti-Corruption Policy, and Supplier Code of Conduct. We continually provide training to key suppliers on ESG topics material to our business and encourage them to obtain third-party ratings as part of our ESG program. In 2022, 79% of our suppliers with \$1 million-plus group spend participated in our ESG program; we're aiming for 100% compliance in 2023.

Children's Rights

Millicom is committed to helping to safeguard children online, including from the evolving risks of online predators and exploitation. To empower consumers to seize the benefits of Millicom technology while avoiding some of the safety pitfalls, Millicom provides education resources and services that help them personalize their internet experience and protect their children and themselves from content they find inappropriate. By creating resources for parents and children, and by working with expert nonprofit organizations, we also aim to raise awareness about safe navigation of online technology.

As the Child Online Protection Industry Guidelines by the ITU and UNICEF states: "During the past 25 years, new information and communication technologies have profoundly changed the ways in which children interact with and participate in the world around them. The proliferation of Internet access points, mobile technology and the growing array of Internet-enabled devices – combined with the immense resources to be found in cyberspace – provide unprecedented opportunities to learn, share and communicate."

Children are more vulnerable than adults in the digital world. Millicom has a responsibility as an internet and TV content provider to implement a series of actions that contribute towards a safer digital environment for children. This is to create an environment that is positive towards children's use of internet and smartphones: children can harness the

benefits of new technology for their development, while they and their guardians are aware and empowered to address possible threats.

At Millicom, we make reasonable efforts to:

- Combat hosting and distribution of child sexual abuse content in our networks.
- Protect children from accessing violent, pornographic or otherwise inappropriate content.
- Protect children from online attack from malware.
- Educate children about inappropriate conduct online, such as cyber-bullying and raising awareness of online reputation.
- Raise awareness of safety issues online for both children and parents, such as grooming, sexting, self-harm content, predatory e-commerce, and privacy protections.
- In our terms and conditions, be particularly aware of special considerations necessary for potential under-age users.
- Promote the civic participation of children and young people by providing platforms for their self-expression and for collecting views and opinions of children on matters affecting them.

Anti-Corruption

Millicom is committed to acting with honesty and integrity. Our success depends on the superiority of our digital content and services, and never as a result of bribery or other means of corruption. As stated in our Anti-corruption Policy, 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.

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. We must abide by all local anti-corruption laws wherever we operate (including Sweden, Luxembourg, and all other jurisdictions applicable to Millicom), including, but not limited to, the U.S. Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act (“UKBA”). Please see our Code of Conduct for further information.

Rights of Indigenous Peoples

We respect the rights of indigenous communities, including land rights, in our operations, in accordance with the UN Declaration on the Rights of Indigenous Peoples.

2 SCOPE AND APPLICABILITY

Millicom’s Human Rights Policy (this “Policy”) sets out the minimum requirements for human rights that every single person working for and with the company must comply with. This Policy applies to Millicom and all its affiliated entities and we expect our suppliers and business partners to uphold the same standards, as enshrined in our Code of Conduct. This Policy also sets out to protect our customers and investors from human rights abuses and related issues.

Our Employees

Our workforce is as diverse as our customers, and our success depends on embracing and respecting diversity. We strive to provide the proper environment and resources to promote every employee's performance and growth. Millicom expects each employee to foster a positive work environment by treating one another professionally. The company does not tolerate harassment or discrimination of any kind. Millicom will take corrective action, including possible termination and/or prosecution, against any employee for violations of Millicom's Core Principles for a Positive Work Environment. For more information, please consult our Employee Handbook and Code of Conduct.

Our Suppliers

We do business with numerous suppliers of all sizes across all markets where we operate in Latin America and in multiple procurement categories (Network, IT & Platforms, Devices, Indirect, etc.). We aim to build long-term partnerships that are mutually beneficial at group and local level, and in accordance with all our legal and compliance obligations, to do business the right way.

We seek to work with businesses that understand and share our values and standards to promote our business purpose in every link of our supply chain. Our Supplier Code of Conduct sets core expectations in the areas of health and safety, environment, fair labor, ethics and compliance. As such, it is regularly revised to ensure its relevance.

Using the platform and methodology of a third-party rating provider, we evaluate suppliers in key ESG areas such as environmental stewardship, labor and human rights, ethics, and sustainable procurement. The results enable us to monitor supplier performance in these areas and how suppliers are progressing over time.

3 DEFINITIONS

Term	Definition
ESG	ESG are a set of environmental, social, and governance standards for company operations, criteria used by many investors.
ICT	Information and communication technologies
FoE	Freedom of Expression

4 ROLES AND RESPONSIBILITIES

Role	Responsibilities
Board of Directors (BoD)	<ul style="list-style-type: none"> • Approval of Millicom's corporate strategy; • Oversight responsibility over Millicom's governance processes and risk management system.
CEO	<ul style="list-style-type: none"> • Ultimate management responsibility for: <ul style="list-style-type: none"> ○ Millicom's corporate culture; ○ Millicom's management of risks; ○ Assignment of roles and responsibilities within the management team; ○ Setting Millicom's strategic direction.

EVP and Chief External Affairs Officer (EVP CEO)	<ul style="list-style-type: none"> • Responsible for risk management framework for political and regulatory environment, which includes human rights issues; • Ensure appropriate and adequate consideration of human rights considerations in Group and operations level decision-making processes; • Ensure alignment between policies, processes, practices and prevailing international standards on and prevailing international standards on human rights at group and operational levels; • Promote a culture with the organization consistent with the Group’s objectives and commitments on human rights, including FoE; • Establish, monitor and report guidance related to Law Enforcement Assistance, Major Events and related legislative developments that impact the Group and its operations, together with the Legal team, and issue related external reports; and • Report to the BoD and Executive Committee on a periodic basis on human rights issues.
External Affairs team	<ul style="list-style-type: none"> • Develop and drive implementation of human rights policies, processes, guidance and training in collaboration with Group functions and operations; • Conduct human rights impact assessments for the Group and operations, develop action plans to mitigate impacts in conjunction with business departments and operations, and develop internal and external reports on human rights issues; • Oversee and manage external assessments of company compliance with prevailing international standards and best practices on human rights in collaboration with operations, Legal, Compliance and Information Security; • Promote a culture within the organization consistent with the Group’s objectives and commitments on human rights, including privacy and FoE; • Ensure alignment between policies, processes, practices and prevailing international standards on human rights at Group and operational levels, with collaboration and participation of Information Security, Legal and Compliance; • Deliver periodic reports to EVP CEO, Executive Committee and BoD on human rights; and • Active participation in and engagement with industry coalitions, thought leaders, multi-stakeholder networks and NGOs on human rights.
EVP and General Counsel	<ul style="list-style-type: none"> • Responsible for risk management framework for legal exposure, which includes data privacy compliance; • Ensure appropriate and adequate consideration of privacy and related considerations in Group and operations level decision-making processes; • Ensure compliance with all applicable legal requirements related to Law Enforcement Assistance, Major Events and related legislative developments that impact the Group and its operations; • Promote a culture with the organization consistent with full compliance with the Group’s legal obligations generally, and specifically with its objectives on privacy.
Global Chief Privacy Officer	<ul style="list-style-type: none"> • Responsible for development, implementation and training on Global Privacy Policy; • Promote a culture within the organization consistent with Millicom’s objectives and

	<p>commitments on privacy;</p> <ul style="list-style-type: none"> • Ensure alignment between policies, processes, practices, as well as providing related training at Millicom and operational levels; • Conduct Data Privacy Impact Assessments, as may be required, and develop action plans to mitigate impacts in conjunction with business departments; • Legal oversight of related legislation, local processes, and collection of data related to such requests; • Ensure company has comprehensive knowledge of current and emerging privacy laws and regulations which affect the business, and that the implications thereof are understood and addressed in related business decisions; • Establish governance process for a privacy program with oversight and participation of senior management and collaboration with Information Security, External Affairs and Compliance, and seek approval from the Executive Committee when appropriate; • Review third party contracts with privacy concerns to ensure compliance with law and company policies and practices; • Provide support to Business Controls and Internal Audit in the establishment of controls to ensure compliance with privacy laws and company policies and practices; • Collaborate with Chief ISO to ensure alignment between Information Security and privacy programs, including policies and practices; • Provide legal advice to commercial, HR and procurement teams on privacy issues with the aim of minimizing privacy-related risks.
<p>Country GMs</p>	<ul style="list-style-type: none"> • Responsible for implementation of human rights, privacy and FoE policies, processes, guidance and training in collaboration with Group functions; • Ensure compliance with company policies on law enforcement requests and Major Events; and related reporting and escalation requirements; • Ensure appropriate and adequate consideration of human rights, FoE and privacy in decision-making processes; • Promote a culture within the organization consistent with the Group’s objectives and commitments on human rights, including privacy and FoE.
<p>Country Corporate Affairs, Regulatory, Legal, Data Privacy Officers and CR teams</p>	<ul style="list-style-type: none"> • Managerial responsibility for implementation of guidance and direction provided by Group on human rights, including FoE and privacy issues; • Deliver periodic updates and reports to Global External Affairs and Legal teams on human rights, including FoE and privacy issues; • Ensure compliance with company policies on law enforcement requests and Major Events; and related reporting and escalation requirements.

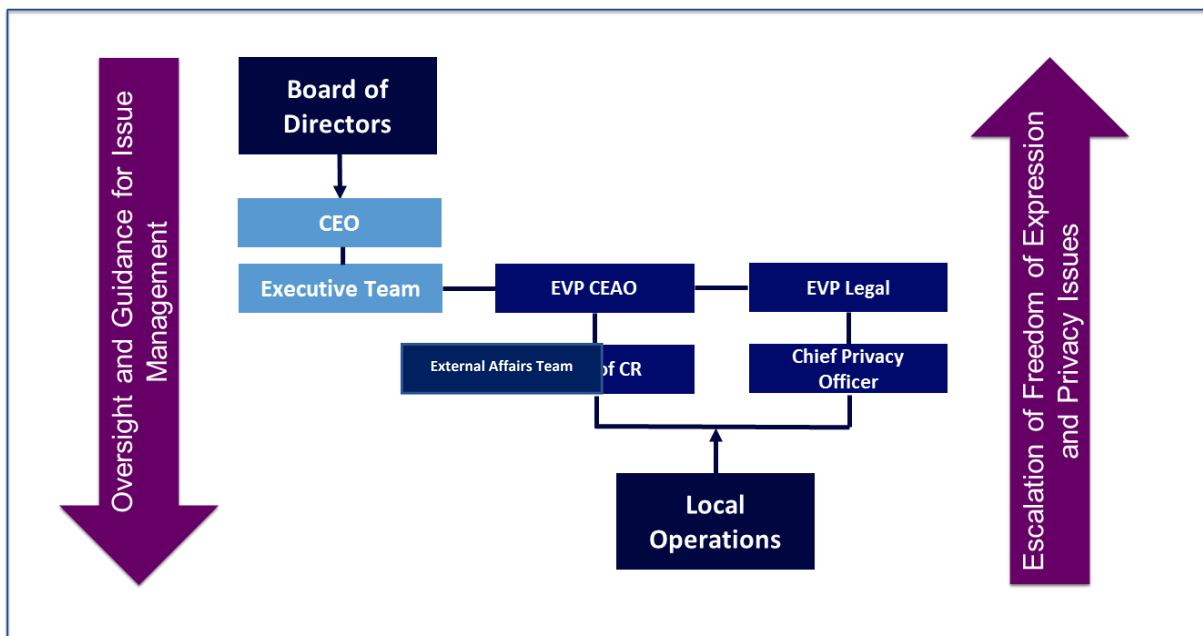
5 POLICY REQUIREMENTS

At Millicom, the External Affairs team leads the company’s efforts on human rights, in cooperation with other areas and in particular the Legal, Ethics and Compliance team. Both teams collaborate and interact extensively on these

issues, with the External Affairs team taking the lead on external engagement with industry coalitions, thought leaders, multi-stakeholder networks and NGOs.

Local Legal and Corporate Affairs functions (the latter including both Regulatory and Corporate Responsibility teams) monitor, report, escalate and collaborate with the Global Legal and External Affairs teams on these issues. Risks related to human rights are communicated to the company's Executive Committee on a regular basis. Millicom's Board of Directors (BoD) also receives updates related to these areas as part of the External Affairs update.

Each operation is responsible for ensuring adherence with the governance framework. Moreover, for our sector's most material human rights issues (Privacy and FoE) each local operation must nominate a member of the legal team ("local privacy officer") who is responsible for local implementation and communication of the privacy governance framework and related responsibilities. The local privacy officers will communicate regularly with the Global Chief Privacy Officer on significant developments or legislative trends.



Privacy and Freedom of Expression

Millicom's main policy framework for law enforcement requests is the Group Guidelines for Law Enforcement Assistance (LEA) and Major Events, which summarize:

- Our obligations within international standards and frameworks
- Roles and responsibilities of each department
- Assessments to be conducted as requests are received
- How to handle urgent and non-written requests
- How to log requests and our responses
- How to protect customer data throughout the process of retrieving information
- How to deliver the information safely

The Law Enforcement Disclosure (LED) Committee reviews and revises these guidelines on an ongoing basis. We also consistently train our staff on implementation and developments. These guidelines define steps to take in case of a major event, including a regional and global escalation process, as well as practical suggestions for engaging with government authorities to limit the remit and/or timeframe of a major event.

Access to Remedy

Employees shall immediately report violations, suspected violations, or questions regarding our Code of Conduct 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 or 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. Contact information, 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. All line managers shall be responsible for the enforcement of and compliance with the Code of Conduct, including providing employees necessary access to the latest version of the Code of Conduct. Millicom will take corrective action against anyone who retaliates against employees who initiate or participate in Ethics & Compliance Department investigations. While Millicom encourages employee reporting, Millicom does not tolerate false reports made simply to harm another employee.

Human Rights Due Diligence

Our human rights due diligence approach is aligned with the United Nations Guiding Principles on Business and Human Rights. This includes policy controls, impact assessments, mitigation and monitoring, tracking our performance, employee training and stakeholder communication. We assess the actual and the potential positive and adverse human rights impacts when:

- developing new products/services/ technologies or making substantial changes to existing offers;
- entering new markets or in anticipation of changes in our existing operating environments;
- considering new partnerships/ acquisitions; and
- engaging with our suppliers.

6 EXCEPTIONS

There are no exceptions to this Policy.

7 ENFORCEMENT

Employees and contracted staff 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 immediate supervisor or the Policy Owner.

8 POLICY COMPLIANCE

As part of our ongoing efforts to raise awareness and ensure oversight of these issues at a local level, Millicom has a number of monitoring and enforcement procedures in place. These include:

- Yearly trainings for staff on key policies such as the Group Guidelines for Law Enforcement Assistance (LEA) and Major Events, Millicom's Global Privacy Policy, and Millicom's Code of Conduct.

- Key controls and other procedures are included in the Internal Control Manual and are therefore part of the Group wide Control Self-Assessment process.
- Millicom has carried out Human Rights Impact Assessments (HRIAs) in several of its operating markets to determine risks and opportunities in the area of human rights.
- Millicom’s Law Enforcement Disclosure (LED) Committee meets at least once yearly to review risks and actions related to freedom of expression and privacy, and to revise and update related policy tools (as deemed necessary).
- Data and information related to Millicom’s LED report is reviewed annually by external assurance providers as part of our corporate responsibility reporting limited assurance process.
- Millicom is also reviewed on an annual basis by a number of other external assessment providers for ESG-related questionnaires and indices.

9 DOCUMENT REVIEW

Reviewed by	Role	Date
Aidan McCartan	External Affairs Specialist	13-JUN-2023
Horacio Romanelli	Director of Regulatory and Sustainability Affairs	13-JUN-2023
Karim Lesina	EVP and Chief External Affairs Officer	13-JUN-2023
Paula Forero	Senior Counsel	13-JUN-2023
Cara Viglucchi	VP Ethics and Compliance	13-JUN-2023

10 REVISION HISTORY

Version	Description of the change	Author	Date
001	Creation of Document	Aidan McCartan	1-JUN-2023

11 REFERENCES

Millicom also has a number of other policies covering other human rights issues such as:

Policy	Language
Millicom Code of Conduct	English Spanish
Anti-Corruption Policy	English Spanish
Anti-Money Laundering (AML) Policy	English Spanish

Speak Up Policy	English Spanish
Third-Party Management Policy	English Spanish
Sponsorship & Donations	English Spanish
Millicom Supplier Code of Conduct	English Spanish
Millicom Global Privacy Policy	English Spanish
Environment Policy	English
Health, Safety & Environment Manual	English
Millicom Waste Management Guidelines	English
Child labor and young workers	English
Law Enforcement and Major Events Guidelines	English