



# Millicom Speak Up Policy





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### Policy Statement

At Millicom, we are committed to doing business ethically so we can be a force for positive change everywhere we operate. Millicom is committed to the highest possible standards of openness, honesty, and accountability. This Policy applies to all Employees and management of Millicom, Tigo, and other Millicom group companies (collectively, “Millicom” or the “Company”), including directors and contracted staff (collectively, “Employees”), as well as any Third Parties (as defined below). Millicom expects Employees and Third Parties that have serious doubts or concerns about wrongdoings to come forward and voice those concerns in order to resolve their doubts.

Our Code of Conduct 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.

## 1.0 Definitions

Employee	Direct employees of Millicom and/or employees from all entities that Millicom owns or controls, including directors and contracted staff.
Third Party	Any Millicom Third Party Intermediary (“TPI”), Business Partner, or other Supplier, consultant, and any other individual with whom Millicom interacts.
Supplier	Any supplier, vendor, contractor, distributor, consultant, and/or other Third Party providing goods, services, and supplies (including software) to support Millicom operations.
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 style="border: 1px solid #0070C0; padding: 5px; background-color: #0070C0; color: white;"> <p>Examples of TPIs include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Law firms;</li> <li>• Logistics companies; and</li> <li>• HR service companies.</li> </ul> </div>
Business Partner	A Third Party that Millicom has an investment or business arrangement with, such as a joint venture, local partnership, or other joint business activity where the Business Partner may interact with Government Officials on Millicom’s behalf, indirectly or directly.
Reporter	Any person (internal or external of the Company) who raises a suspicion or concern of wrongdoing at Millicom through any communication channel defined in the Speak Up! Reporting Concerns section of this Policy.



## 2.0 General Principle

- 2.1 Do what’s right for the right reason and be a force for positive change. Whistleblower protection is integral to fostering transparency, promoting integrity, and detecting misconduct. Millicom’s Code of Conduct and this Policy require Employees and Third Parties to report in good faith any wrongdoing discovered during the course of their work at or with Millicom through any communication channel defined in the Speak Up! Reporting Concerns section of this Policy.

“Wrongdoing” includes any conduct or behavior that is or could be considered contrary to Millicom’s Code of Conduct, policies and procedures, legal requirements, or other ethical considerations.

## 3.0 Confidentiality and Non-Retaliation

- 3.1 Millicom will respect the confidentiality of any concern received where the reporting individual requests anonymity, and it is legally permissible to do so.
- 3.2 Once an individual reports a matter, Millicom will disclose the identity of the individual only to those in charge of the corresponding investigation. The investigating team will make every effort to respect confidentiality, and will prevent any sort of retaliation against good faith Reporters.
- 3.3 Millicom recognizes the value Reporters bring to an effective compliance program. Millicom strictly prohibits anyone from retaliating against a Reporter who raises a concern in good faith. In accordance with the Code of Conduct and this Policy, Millicom considers retaliating against a Reporter who raises a concern in good faith as a serious disciplinary offence which may result in disciplinary action, up to and including termination of employment (for Employees) or termination of the relationship with Millicom (for Third Parties).
- 3.4 Good faith reporting is critical to an effective compliance program; bad faith allegations, however, undermine the culture of integrity at

<b>Do's</b>		
	Report concerns of wrongdoing through the proper communication channels (as described in Section 5.0)	
	Provide all relevant information to investigators	
	Encourage other Employees to speak up	

Reporting in “good faith” means providing all the information you know and believe to be true.



Millicom. Millicom regards any deliberately false or malicious allegations made by any Employee as a serious disciplinary offence which may result in disciplinary action, up to and including termination of employment (for Employees) or termination of the relationship with Millicom (for Third Parties).

#### 4.0 Data Privacy

- 4.1** Millicom is committed to safeguarding the privacy, confidentiality, and security of Employee data entrusted to us. The Company may collect such data as part of an investigation, including Reporter information as well as information related to the subject of the complaint. Millicom collects and uses personal information only for lawful purposes, and complies with applicable laws when transferring personal information across international borders. Millicom limits access to information collected to the strict minimum necessary and prevents unauthorized persons from accessing any such information.



#### 5.0 Speak Up!

##### Reporting Concerns

- 5.1** Employees shall immediately report violations, suspected violations, or questions regarding this Policy or any applicable law or regulation 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.
- 5.2** 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, and on posters in your facility’s Employee posting area.
- 5.3** All line managers shall be responsible for the enforcement of and compliance with this Policy, including providing Employees necessary access to the latest version of this Policy.
- 5.4** Millicom will take disciplinary 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.





**6.0 Response**

**6.1** Millicom will respond to concerns raised under this Policy. Millicom will conduct an initial inquiry to assess the merits of a concern. If appropriate, the Company will then decide which area (i.e., Human Resources, Legal, or Ethics & Compliance, etc.) can best address the concern. If an investigation is appropriate, a qualified individual will investigate the matter to reach findings.

<b>Don'ts</b>			
	Retaliate against a Reporter raising a concern in good faith		
	Refuse to participate in investigations		
	Discuss confidential information with other Employees		

**6.2** If the Reporter provides a contact email address to the Company, within three days of a Company investigative team receiving the concern, Millicom will notify the Reporter that the Company has received the concern and whether the Company requires or would benefit from any additional information from the Reporter. When feasible, Millicom may provide an estimation of how long it will take the Company to provide an update or final response.

**6.3** The amount of contact between the investigation team and Reporter will depend on the nature of the matter raised, the potential difficulties involved, and the clarity of the information provided. If necessary, Millicom will seek further information from the Reporter.

**6.4** For further information, please consult the Millicom Global Investigations Manual and Procedure.

**7.0 Resources**

- 7.1** Code of Conduct
- 7.2** Internal Investigations Guide
- 7.3** Millicom Global Investigations Manual and Procedure



### 8.0 Revision History

Revision No.	Effective Date	Changes	Prepared By	Reviewed By
2.0	01 January 2018		Ethics & Compliance Department	HL Rogers - EVP Chief Ethics & Compliance Officer Susy Bobenrieth – EVP Chief Human Resources Officer
<b>Latest Revision Approved By:</b>			<b>Signed:</b>	