



Airtel Africa plc

Code of Business Ethics for partners and suppliers



This document is issued under the authority of the Airtel Africa's CEO and has the approval of the Board of directors of Airtel Africa plc. Unauthorised duplication or distribution of this document is strictly prohibited. The owner of this policy shall ensure that it is updated in line with the defined review cycle.



Contents

03	Introduction
03	Scope the policy
04	Code of business ethics
04	Ethical conduct
05	Labour and human rights
07	Sustainable practices
08	Data privacy and information security
09	Tax evasion, sanctions and trade control
10	Business continuity
11	Media relations
12	Conflict of interest
13	Reporting and compliance
14	Appendix
14	Version control

Code of business ethics for partners and suppliers

At Airtel Africa, we are committed to conducting our business with integrity, responsibility and respect ensuring ethical and sustainable practices. Our partners and suppliers play a crucial role in supporting these principles. This Code of business ethics outlines the standards we require our partners and suppliers to adhere to while maintaining a productive, ethical and responsible partnership. By working together, we aim to create lasting value for our customers, communities and the environment.

Scope of the policy

Our Code of business ethics is applied to all partners and suppliers who work for or on behalf of Airtel Africa plc and its subsidiaries. We require our current partners and suppliers to adhere to this Code by and strongly encourage suppliers to also extend this recommendation to their own suppliers in the value chain.

Legislation

Partners and suppliers shall comply with all applicable laws, regulations and industry standards in the regions where they operate, including those related to labour, environmental protection, safety and business ethics.

>> For more information about our Code of Conduct, go to www.airtel.africa



Ethical conduct

Partners and suppliers shall uphold the highest standards of business ethics and integrity, including but not limited to:

1. Anti-bribery and anti-corruption

Partners and suppliers shall avoid any form of corruption, bribery or unethical business practices. All partners and suppliers must read, understand and abide by Airtel Africa's anti-bribery and anti-corruption (ABAC) policy.

Non-compliance with our ABAC policy and all relevant anti-bribery or anti-corruption laws and regulations may lead to the termination of an existing commercial agreement, with no liability incurred by Airtel Africa, and may result in legal prosecution.

2. Intellectual property

Partners and suppliers shall respect intellectual property rights, including patents, trademarks, copyrights and trade secrets.

>> For more information about our ABAC policy, go to www.airtel.africa

3. Fair business practices

Partners and suppliers shall maintain accurate and transparent record-keeping and financial reporting.

They shall uphold the highest standards of fair business and refrain from providing Airtel Africa's employees with any form of compensation, reward, gift or other benefit which may influence their objective decision-making and create a potential conflict of interest.



Labour and human rights

Partners and suppliers shall respect and promote human rights and treat their employees and workers fairly. This includes:

1. Child* and forced labour

Prohibiting any form of modern slavery, including child labour or forced labour: partners and suppliers shall ensure that there is absolutely no child labour and human trafficking within their organisation.

Partners and suppliers shall not use any form of forced labour, involuntary labour or any form of abuse, coercion or harassment as defined by the International Labour Organisation (ILO). All work should be voluntary, and workers should be free to leave work or terminate their employment with reasonable notice.

2. Discrimination

Ensuring a workplace free from harassment and abuse: partners and suppliers shall not discriminate their employees with respect to any employment-related matters based on gender, race, religion, disability, ethnicity, marital status, nationality or any other characteristics. Partners and suppliers shall treat every employee equally and according to their abilities and performance.

* Child as described by the legal working age in the national laws.

3. Health and safety

Providing a safe and healthy working environment for all workers: partners and suppliers must establish and follow a clear set of procedures regulating occupational health and safety, including management of incidents. Responsibility for health and safety must be assigned to a senior management representative.

Partners and suppliers must ensure they meet general principles of health and safety risk prevention. These include identifying, minimising and preventing hazards, using competent and trained people, providing and maintaining safe equipment and tools, including personal protective equipment (PPE) when required. Workers must receive appropriate, regular and recorded health and safety training.

4. Fair remuneration

Providing employees and workers with equitable compensation, including fair wages, benefits and reasonable working hours. Partners and suppliers must adhere to national legal standards concerning the minimum wage. They must strive to guarantee equal compensation for work of equal value between men and women.

>> For more information about our modern slavery policy statement, go to www.airtel.africa



5. Radio frequency electromagnetic fields (RF/EMF) monitoring

Our network equipment and mobile device partners and suppliers are expected to comply with the International Commission on Non-Ionising Radiation Protection (ICNIRP) guideline thresholds and also comply with local regulations and guidelines regarding radio frequency and electromagnetic fields (RF/EMF). They are also expected to implement safety measures for their employees

6. Working hours

Partners and suppliers must ensure that wages for working hours and overtime are paid regularly to employees based on local laws and/or applicable industry standards. Working hours should not exceed the maximum permissible limit.

7. Living and working conditions

Partners and suppliers who provide residential accommodation for employees involved in factory operations must provide acceptable living conditions. We firmly believe that the wellbeing and dignity of all individuals in our supply chain are important. Therefore, we expect our partners and suppliers to adhere to providing workers with safe, clean and hygienic housing facilities that comply with all local laws and regulations.

Workers should have access to basic amenities such as clean drinking water, sanitation facilities and cooking areas. Adequate lighting and ventilation must also be provided. This includes regulations related to occupancy limits, safety standards and housing quality.

8. Freedom of association

Partners and suppliers are encouraged to support freedom of association, including the right to engage in trade unions and collective bargaining. They should aim to create an environment in which their employees and representatives, including temporary workers, feel comfortable expressing themselves openly within the company without the fear of reprisal, discrimination or obstruction.



Sustainable practices

Responsible sourcing

- Airtel Africa is committed to responsible sourcing practices and expect our partners and suppliers to adhere to ethical principles in sourcing raw materials, components and services.
- Partners and suppliers are required to ensure that their sourcing practices align with internationally recognised standards, avoiding engagement with entities involved in unethical practices, such as forced labour, child labour, human trafficking or environmental degradation.
- Partners and suppliers must encourage sustainability throughout their respective supply chains, including the sourcing of materials and adherence to fair labour practices.

Environmental responsibility

- Airtel Africa has ambitious environmental sustainability goals and encourages partners and suppliers to contribute to these goals. Partners and suppliers shall demonstrate commitment to environmental sustainability by adhering to all applicable international, national and local environmental laws and regulations.
- Partners and suppliers are encouraged to implement environmental management systems based on international standards to minimise environmental impact.
- To reduce their environmental footprint, partners and suppliers must make continuous efforts to optimise their business operations by reducing greenhouse gas (GHG) emissions, eliminating waste, conserving resources, protecting biodiversity and promoting recycling and reuse.
- Partners and suppliers shall aim to develop products and services that are energy efficient and aim to measure and reduce GHG emissions during the entire lifecycle and value chain.



Data privacy and information security

We value the trust placed in our partners and suppliers to uphold stringent data privacy principles and expect proactive measures to mitigate any risks associated with data handling.

- Airtel Africa prioritises data privacy and we expect our partners and suppliers to adhere to rigorous standards in safeguarding personal data. Partners and suppliers are required to handle all data provided by Airtel Africa with the highest level of confidentiality and in compliance with applicable data protection laws and regulations. This includes ensuring secure storage, transmission and processing of any personal or proprietary information entrusted to them. Any use or sharing of data must be solely for the purposes outlined in the agreed-upon business relationship.
- Partners and suppliers shall safeguard any sensitive or confidential information provided by Airtel Africa, including customer data, intellectual property and proprietary information and ensure that appropriate measures are in place to protect against data breaches and unauthorised access.
- Partners and suppliers are expected to implement robust data protection measures, including organisational and technical measures such as encryption, access controls and regular audits, to prevent unauthorised access or breaches. Where a supplier experiences any breach of personal data that pertains to Airtel Africa, that supplier is expected to notify Airtel Africa's supply chain management immediately. Necessary action will be taken to deal with such a breach in line with our data protection policy and applicable laws.
- Partners and suppliers shall safeguard any sensitive or confidential information provided by Airtel Africa, including customer data, intellectual property and proprietary information and ensure that appropriate measures are in place to protect against data breaches and unauthorised access.
- Partners and suppliers are required to comply with Airtel Africa's information security policy which can be found on our website www.airtel.africa



Tax evasion, sanctions and trade control

- Airtel Africa adheres to all tax laws, sanctions and trade control regulations applicable in the regions where we operate, and we extend these obligations to our supply chain. Partners and suppliers who engage with Airtel Africa are required to comply with all relevant tax laws, regulations and reporting requirements in their jurisdictions and ensure transparency in their tax practices.
- Partners and suppliers must also adhere to international trade control laws and sanctions, refraining from engaging in any business activities that contravene these regulations. Any involvement in money laundering, terrorist financing or any other unlawful trade practices is strictly prohibited.
- We expect our partners and suppliers to conduct regular due diligence to ensure that their operations and transactions do not breach sanctions or trade control laws. Compliance with these legislative requirements is integral to maintaining ethical business practices and upholding the legal obligations that govern our operations and those of our supply chain partners.



Business continuity

Airtel Africa values the commitment of our suppliers to uphold service continuity, ensuring reliability and resilience even in challenging circumstances, thereby safeguarding the seamless delivery of services to our customers.

- Airtel Africa emphasises the critical importance of uninterrupted service delivery and expects its partners and suppliers to establish robust business continuity management systems. Partners and suppliers are required to implement comprehensive processes and systems that guarantee the continuity of services as contracted. This includes developing contingency plans, risk assessments and response mechanisms to mitigate potential disruptions and maintain seamless operations.
- Partners and suppliers must proactively identify vulnerabilities, establish recovery strategies and regularly test and update these plans to ensure effectiveness.



Media relations

Airtel Africa values collaborative and transparent communications and encourages partners to engage in open dialogue while adhering to the established protocols for media-related engagements.

- In alignment with Airtel Africa's commitment to maintaining transparent and consistent communication, partners and suppliers are required to seek prior authorisation from Airtel Africa before issuing any press statements or communications concerning their partnership with us. This pre-authorisation ensures alignment with our communication strategies, ensuring accuracy and consistency in public disclosures. By seeking approval beforehand, partners and suppliers contribute to maintaining the integrity and coherence of our shared messaging while upholding the reputation and trust associated with our collaborations.



Conflict of interests

Partners and suppliers play a pivotal role in maintaining a fair and unbiased business environment, and their commitment to identifying and disclosing conflicts of interest fosters trust and strengthens the ethics of our partnerships.

- Partners and suppliers engaging in business dealings with Airtel Africa are required to disclose any known or potential conflicts of interest to Airtel Africa at the onset of engagement and at any time during the business relationship with Airtel Africa when an actual or potential conflict arises. This proactive reporting ensures transparency and integrity throughout our collaborations.



Reporting and compliance

- Partners and suppliers shall promptly report any known or suspected violation of this Code of business ethics or raise any concerns by contacting airtelombudsperson@kmpg.co.za, engaging accordingly and/or cooperating fully in investigations, if needed.
- Failure to adhere to this Code of business ethics may result in corrective action, including potential termination of the business relationship.
- Partners and suppliers who are unable to fully adhere to this Code of business ethics should promptly notify Airtel Africa in detail about their non-compliance. They should also specify whether they intend to achieve compliance in the future and provide an estimated timeframe for doing so.
- Upon request, partners and suppliers must provide relevant information related to the issues addressed in this Code of business ethics within a reasonable timeframe.
- Partners and suppliers are obliged to inform their employees and subcontractors about their commitment to our Code of business ethics and endeavour to ensure that subcontractors also accept and abide by the terms of this Code.
- Airtel Africa will maintain oversight of adherence to this Code of business ethics through ongoing review of supplier relationship and may conduct audits of supplier compliance either directly or using third-party firms. Partners and suppliers are expected to make improvements based on the outcomes of these audits.
- Airtel Africa is also a member of the Joint Audit Cooperation (JAC) which represents telecommunications service providers with shared partners in the ICT industry. JAC members undertake onsite audits of selected partners and suppliers' operations annually to assess ESG standards of the suppliers and monitor compliance with ESG best practices.
- By working with Airtel Africa, our partners and suppliers commit to upholding the high standards in human and labour rights, environmental performance as well as business ethics. We maintain that there is no place for the abuse of employee rights, violations of legislation, regulation or governance standards or environmental negligence in our supply chain. We value our suppliers' commitment to these standards and look forward to a successful and mutually beneficial partnership aimed at working together to create a sustainable, ethical and responsible business ecosystem.



Version control

The Code of business ethics for partners and suppliers is subject to change based on need or in response to changes in Airtel Africa’s operations, emerging issues, regulations and stakeholder requirements. Any changes to this document will be approved by the authorised signatories and communicated to all relevant stakeholders, including employees, vendors and contractors.

Version	Revisions	Approved by	Date	Policy code
1.0	This is the first standalone Code of business ethics for partners and suppliers of Airtel Africa plc.	Audit and Risk Committee and the Board of directors.	March 2024	AAL/SCM/PO/009





airtel

Airtel Africa plc

53/54 Grosvenor Street
London W1K 3HU
England