



Airtel Africa plc

Community grievance mechanism

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Community grievance mechanism

This policy outlines the commitment of Airtel Africa plc ('Airtel Africa') to listen and respond to community concerns arising from our actions or the actions of any of our partners or suppliers. We are dedicated to ensuring our operations have a positive impact on local communities. The grievance mechanism outlined in this policy provides our communities with a voice and ensures we act to address all concerns raised.

Scope of the policy

The community grievance mechanism is applicable to Airtel Africa and all its subsidiary entities (the 'Group'). We also expect our partners, suppliers and third-party contractors to adhere to our ESG standards.

Our community grievance mechanism has been developed to meet requirements, prevent and address community concerns, reduce risk and assist programmes that create positive social impact. It is designed to accept, assess and resolve any community complaints concerning Airtel Africa's performance or conduct as we roll out our network and other projects in 14 sub-Saharan markets of operation.

This mechanism contributes to the smooth running of our operations and helps to address any issues that may arise during project implementation phase in a timely, fair and efficient manner, especially those around our environment and social footprint.



Addressing concerns from the community

Purpose and objectives

At Airtel Africa we manage community grievances from our operations through established processes at OpCo* and the Group levels. We take a precautionary approach to identifying and resolving the concerns of our local communities. We work hard to ensure we plan and implement our operations to limit any potential disruption to communities.

However, we recognise that grievances may still arise occasionally. Therefore, we established a robust community grievance mechanism to provide a way for issues to be communicated, logged, investigated, tracked and resolved.

* Operating companies

The specific objectives of this mechanism are:

1. To address complaints and grievances and enhance conflict resolution arising from and during Airtel Africa's project implementation.
2. To ensure transparency and accountability throughout the implementation of projects and programmes amongst the communities and relevant stakeholders.
3. To resolve any emerging environmental and social grievances in project areas.
4. To promote good relations between the company's project managers, implementation taskforce and beneficiaries.



Definition and principles

Definition of community grievance

We define community grievances as an expression of dissatisfaction or concern arising from the real, perceived or anticipated impact of Airtel Africa’s business operations or the actions of our direct suppliers and partners.

Our community grievance mechanism outlines the process of systematically receiving information, investigating, responding to and closing complaints or grievances from affected communities in a timely, fair and consistent manner. We will rely on dialogue with the community to address issues in an amicable manner. To ensure the mechanism is inclusive, grievances can be written or verbal in any community language.

Principles to ensure effectiveness

The community grievance mechanism is applicable to all markets in which we operate. To ensure its effectiveness, we embedded the following principles in the community grievance mechanism:

a. **Legitimacy:** building trust that we shall engage and be accountable for the effectiveness of the processes.

- b. **Accessibility:** ensuring local communities and other stakeholders are aware of the mechanism and assistance is provided for those who may face barriers to access.
- c. **Predictability:** providing a clear and stated procedure for each stage as well as clarity regarding the process, time taken and expected outcomes.
- d. **Equitability:** seeking to ensure that aggrieved parties have reasonable access to the information, advice and expertise necessary to engage on fair, informed and respectful terms.
- e. **Transparency and accountability:** ensuring involved parties are updated on the progress of the grievance resolution and that it is done out of public interest.
- f. **Rights-compatible:** ensuring that outcomes and remedies accord with national and international standards. Not-restricting access to other redress mechanisms.
- g. **Continuous learning:** drawing on experience to identify ways of improving the mechanism and preventing future grievances and harms.
- h. **Engagement dialogue and feedback:** consulting the community and other interested stakeholder groups, focusing on dialogue to address and resolve grievances, and channeling community feedback to improve outcomes for the people.



Community grievance mechanism process

STEP 1

Receive, acknowledge, assess and record

All grievances are lodged via various channels: email, dedicated customer care telephone lines, social media or through our meetings with community representatives. Irrespective of the channel, each grievance is acknowledged, and the complainant informed of the next steps. Grievances are recorded using a dedicated grievance receipt and acknowledgement form. A copy of the form is provided to the complainant and the relevant management team is notified.

STEP 2

Assess, assign and investigate

Every received grievance is assessed, and an appropriate investigation is determined. If necessary, the investigation may include a risk assessment by relevant functions. This investigation may also include meetings between the complainant/community representative and Airtel Africa, and/or any other expert. Grievances with high severity level are escalated to the Executive Committee (ExCo) of the respective OpCo and, if appropriate, to the Sustainability Committee.

Duration of the process is a minimum of 35 business days.

STEP 3

Resolution

We look to resolve community grievances through dialogue with the complainants. Depending on the severity of the findings of our investigations, resolution is often decided as soon as all the facts are understood and reviewed. Once the complainant accepts the solution, the grievance is considered resolved. Should the complainant not agree with the proposed solution, the members of the OpCo ExCo are notified for further action.

STEP 4

Complainant satisfaction

If the complainant is satisfied that the complaint has been properly resolved, the process concludes with written minutes signed by both the complainant (or their appointed representative) and Airtel Africa’s representative who has been designated by the OpCo’s managing director (MD) to handle grievance management. If the complainant is not satisfied that the complaint has been properly resolved, the issue is referred to the OpCo ExCo for further action. If it remains unresolved, the complainant has an option to consider alternative channels for resolution and further mediation.

STEP 5

Lessons learned

A key step in the process is a regular review of the lessons learned from received grievances. Frequently occurring issues are regularly discussed with the senior management at the OpCo level and the Sustainability Committee. The learnings are applied to our operations to prevent future repetition of the same community concerns or to improve the grievance management process itself.

Monitoring and evaluation

To ensure effectiveness and continuous improvement of the grievance mechanism, we regularly evaluate the process and use key performance indicators (KPIs) to measure its success.

We carry out a full evaluation annually.

The results of the evaluation for each OpCo are summarised and provided to the respective OpCo ExCo.

Progress is reported in the Sustainability Reports annually:

- Number of complaints received
- Number of complaints resolved
- Number of complaints unresolved/escalated
- Number of repeat grievances



Version control

The grievance management procedure is subject to change based on business needs or in response to changes in Airtel Africa’s working arrangements. Any changes to this document will be approved by the authorised signatories and communicated to all relevant employees.

Version	Revisions	Approved by	Date	Policy code
1.0	This is the first standalone community grievance mechanism of Airtel Africa plc.	Audit and Risk Committee and the Board of directors.	January 2024	AAL/SUS/PO/069





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