



Whistleblowing policy





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Introduction

About the policy

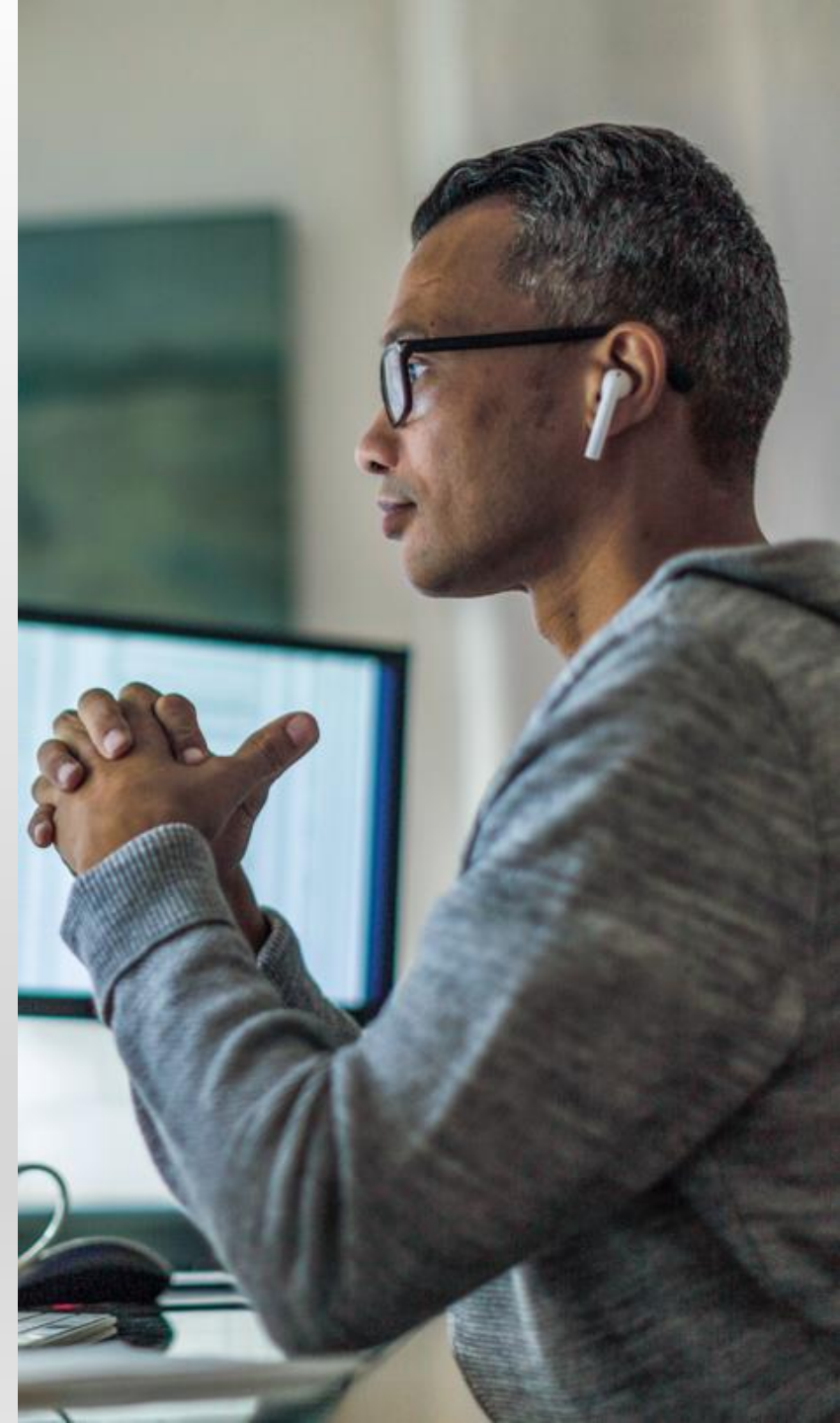
The purpose of the whistleblowing policy is to ensure that Airtel Africa upholds high standards of transparency and integrity while encouraging its employees and wider stakeholders to openly address their concerns. This is achieved by establishing a whistleblowing mechanism through which employees and/or third parties can address, in good faith, potential unethical practices and/or wrongdoing that could harm, in any way, the Group, a partner, an employee and/or external stakeholders. Such claims shall be handled with the utmost level of professionalism and independence through the Group's Ombudsperson process.

Scope of the policy

This policy is applicable to all employees of Airtel Africa and its subsidiaries, including third parties acting for or on behalf of Airtel Africa and its subsidiaries.

This policy is established to encourage the disclosure of information by employees and third parties to the Ombudsperson about potential unethical practices and wrongdoing, including but not limited to:

- Danger to health and safety
- Failure to comply with any legal obligation
- Actual or suspected fraud being perpetrated by an employee or a partner
- Risk exposure of any kind observed by an employee or partner that could result in damage or losses for the Group
- Bribery, corruption, conflict of interest or favouritism perpetrated by an employee or a partner
- Sexual harassment, bullying and harassment against an employee
- Criminal offence being committed or facilitated
- Discrimination and victimisation of any kind
- Any form of abuse in the office environment
- Misuse of company property
- Malicious leakage of critical company information
- Violation of any internal company policy or government regulation.



Our principles and commitments

Policy statement

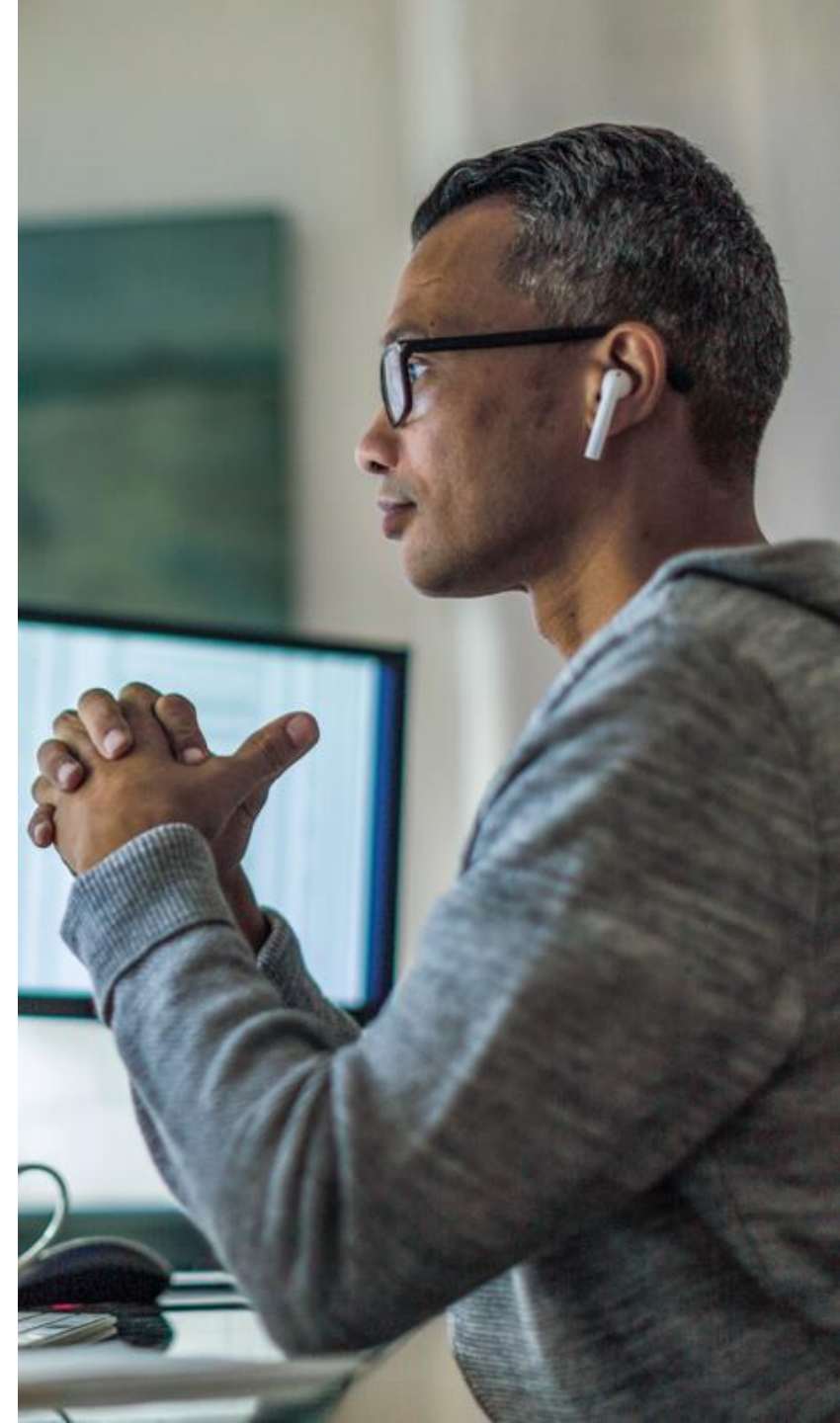
Airtel Africa conducts its business in a way that respects the right of an employee or a third party to make a complaint confidentially or anonymously as outlined in the Code of Conduct which underpins everything we do.

Anonymity and commitment to non-retaliation

- An employee or third party can make a complaint confidentially and may choose to do so anonymously. However, Airtel Africa encourages anyone raising a concern to provide his/her name to facilitate addressing the concern more effectively and expeditiously. An employee or partner reporting a complaint is under no obligation to reveal his/her identity or to provide additional information. In such cases, the matter would be concluded using the information available.
- We recognise that the decision to report a concern can be a difficult one to make. Airtel Africa does not tolerate any retaliation or victimisation of a whistleblower and shall take appropriate actions to protect the whistleblower when a concern has been raised in good faith. Harassment, retaliation or victimisation of a whistleblower shall be treated as a disciplinary offence, and any employee who engages in any such retaliation will be subject to strict disciplinary procedures up to and including termination of employment.

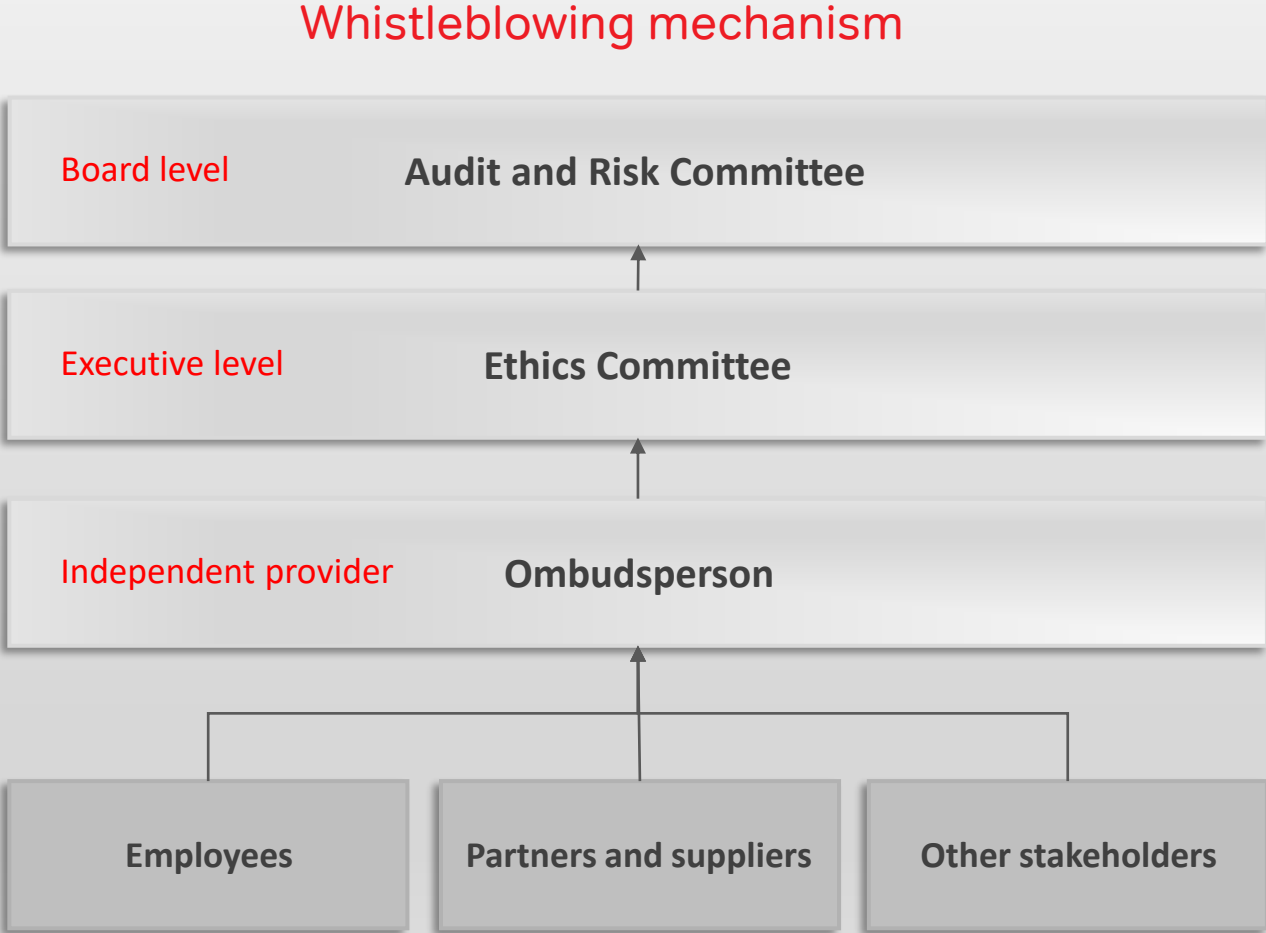
- If it is concluded, however, that a complainant has made false allegations maliciously, the complainant may be subject to disciplinary action.

>> Airtel Africa's Code of Conduct can be found on our website www.airtel.africa



Reporting concerns and whistleblowing mechanism

- An employee or partner who wishes to report a concern should do so by providing relevant facts or evidence to highlight the suspected issue through the various reporting channels (phone or e-mail).
- Our whistleblowing programme is a confidential channel through which employees, partners and suppliers as well as other stakeholders can report unethical practices or wrongdoing. We have an independent whistleblowing process managed by an external professional services firm.
- The details of the whistleblower hotlines can be found on various company communication channels, including laptop screensavers, posters, internal email communications as well as on our website www.airtel.africa.
- The Ombudsperson shall take all reasonable means to acknowledge receipt of a complaint within 48 hours of a complaint being raised.
- All matters raised will be assessed as to whether further investigation is possible and/or necessary. The decision to investigate any reported misconduct is at the discretion of the Ombudsperson depending on the severity of the allegation and evidence available.
- All matters reported through the whistleblowing channels shall be treated with a high level of confidentiality and utmost care.



How we respond to concerns

Ombudsperson reporting

- The Ombudsperson shall refer all matters to the chief compliance officer (CCO) and the chief executive officer (CEO) for necessary actions.
- The Ombudsperson shall report matters directly to the chair of the Audit and Risk Committee if the matter relates to senior executives of Airtel Africa.
- On a regular basis, the Ombudsperson shall prepare a summarised report of complaints received and actions taken for presentation to the Audit and Risk Committee.

Investigation

- The CCO will review each case received and determines the appropriate mode of investigation in consultation with the Ethics Committee.
- All investigations shall be confidential and are conducted internally or by an independent third party where appropriate, depending on the nature of allegations.
- The Ethics committee is consulted as necessary depending on the nature of the allegations or the outcomes of investigation reports from time to time.

Decision-making

- All matters raised will be assessed as to whether further investigation is possible and/or necessary.
- The composition of the Ethics Committee comprises the CEO, the chief internal auditor, the chief human resources officer (CHRO), the chief legal officer (CLO) and the chief compliance officer (CCO). All matters shall be determined in fairness, independence and impartiality upon thorough review of the facts and testimonies.

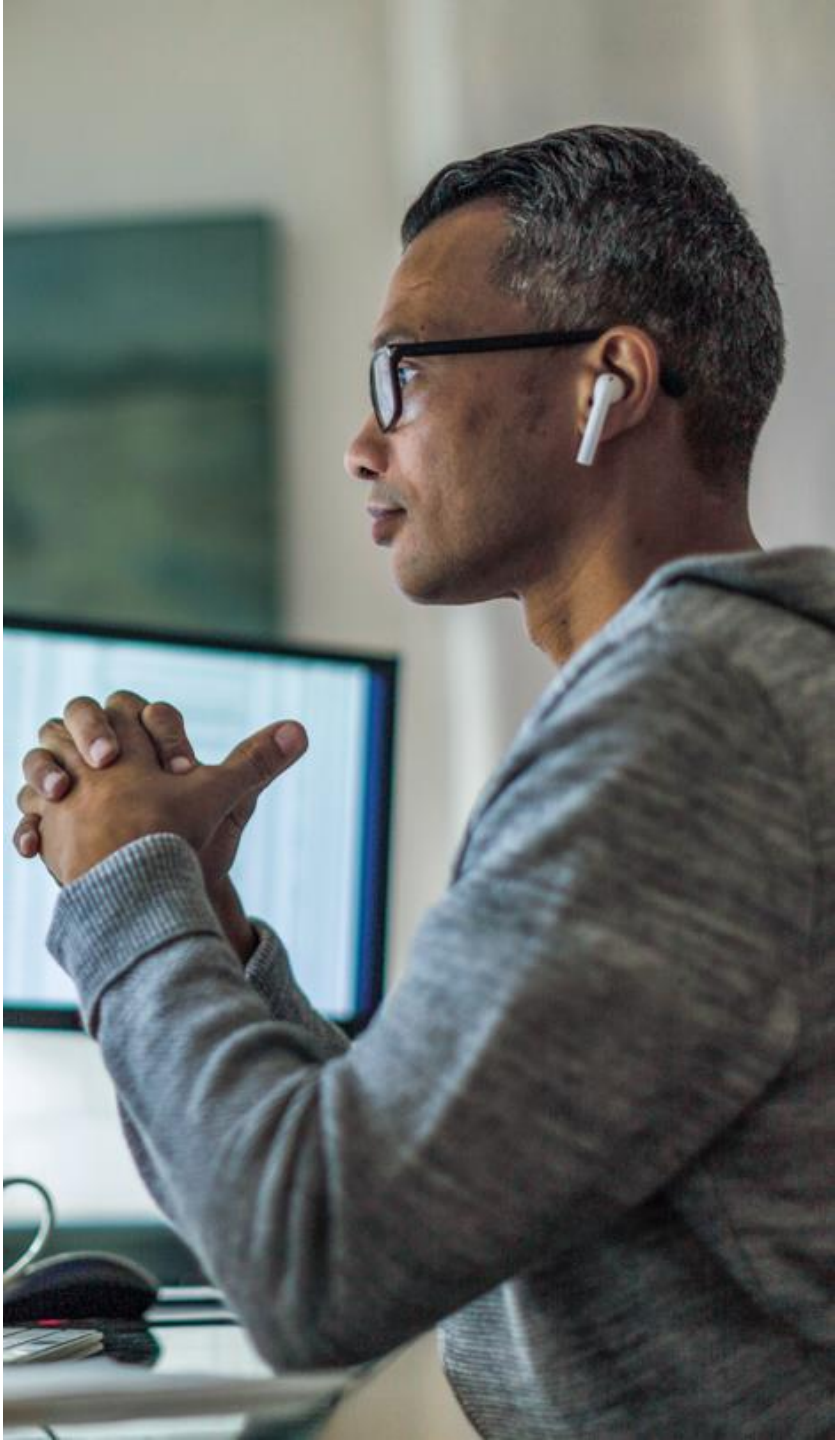


Whistleblowing channels

Our hotline is available 24/7 in the official local languages according to the countries where we operate, including English, French and Swahili.

- By email: airtelombudsperson@kpmg.co.za
- By telephone:

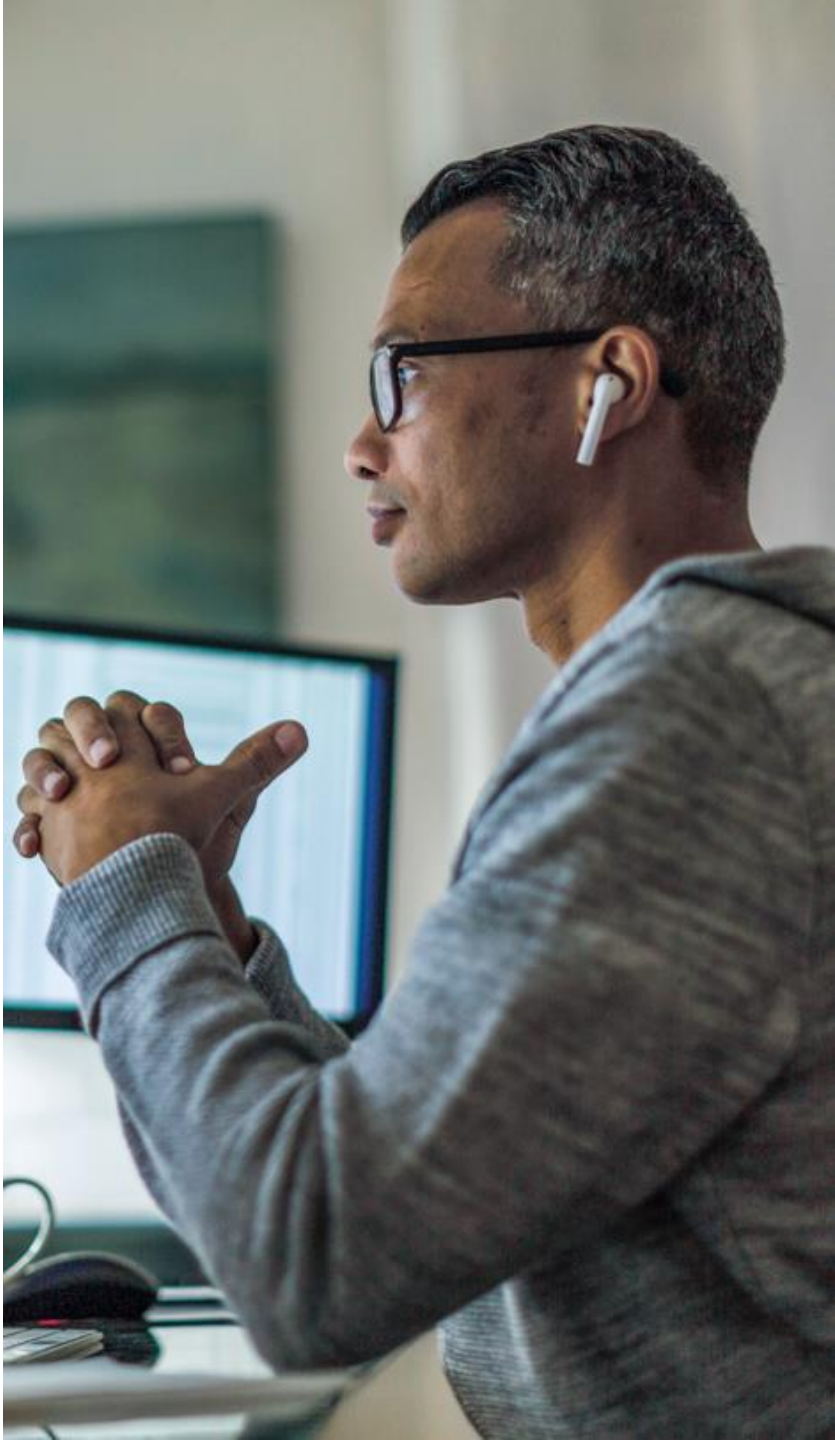
OpCo	Toll-free hotline
Chad	62923939
Gabon	707
The Democratic Republic of the Congo (DRC)	0970016000
Kenya	0800333330
Madagascar	344
Malawi	0997999222
Niger	99999887
Nigeria	07011211111
The Republic of the Congo	057838383
Rwanda	0737333333
Seychelles	4600900
Tanzania	0800784444
Uganda	0752008888
Zambia	0970333333
External provider's direct line (non-toll free)	+27 12 543 5381



Version control

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

Version	Revisions	Approved by	Date	Policy code
1.0	This is the first standalone whistleblowing policy statement of Airtel Africa plc.	Audit and Risk Committee and the Board of directors.	March 2024	AAL/HR/PO/006/EXT





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