

A photograph of two young women of African descent standing indoors, looking at a smartphone together. The woman on the left has curly hair and is wearing a grey t-shirt under a tan cardigan. The woman on the right has long braids and is wearing an orange sleeveless top. They are both smiling and looking at the phone held by the woman on the right. The background is a bright, slightly out-of-focus interior with white curtains.

Our foundation
Trust & Integrity
Code of Conduct

Airtel Africa



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**Our
values**



Our values

People mean everything to us; we strive to delight with everything that we do. We will only be the best when we give our best. By thinking about tomorrow, we bring greatness to today. When we connect our communities, we create a better world for all.



Alive

We act with passion, energy and a can do attitude. Innovation and an entrepreneurial spirit drive us.



Inclusive

We champion diversity. We anticipate, adapt and deliver solutions that enrich the lives of the communities we serve.



Respectful

We share the joy and pain of our customers. We act with humility and are always open and honest.



A message from Raghunath Mandava



As a leading telecom organization in Africa, Airtel Africa is at the heart of a continually evolving communications landscape.

Over the last decade, we have connected millions whilst empowering them to fulfill their potential. We have always strived to contribute to the sustainable development of society through our business.

We are committed to our corporate values – Alive, Inclusive and Respectful. These values underpin our actions and guide our decisions. Our reputation is also built by each one of us espousing these values.

The values which shape our business ensure that we make ethical choices and our Code of Conduct sets forth our commitment to always operate with integrity and transparency. Ethical behavior is non-negotiable in our

operations and it is our fundamental responsibility towards our customers and partners.

I urge each of you, as key contributors to Airtel Africa's success, to be aware of these guidelines and conduct business in a transparent and fair manner. There will be times when you will have questions on what action to take and it is our individual responsibility to seek guidance.

We must make the Code of Conduct an integral part of our day to day duties and only then will we be able to add value to our business, customers, partners and society at large. Thank you for your continued support as we move forward.

Best regards

Raghunath Mandava
MD & CEO
Airtel Africa

Our underlying principles

Our Code of Conduct is a public declaration of how we do business and clarifies expectations from ourselves and those we work with as key stakeholders. It also sets the framework for implementation of our corporate policies, guidelines and procedures.

Many of the policies referred to in our Code of Conduct are available for further consultation on the company's intranet. If you feel there is a conflict between our Code of Conduct and any corporate policies, guidelines or procedures, you should comply with the most restrictive requirement or seek clarification from your Compliance manager. In Airtel Africa, we subscribe to doing business fairly and ethically. Therefore, in our day-to-day business activities, we commit to:

Uphold the highest levels of personal conduct at all times

Integrity and ethical conduct are pivotal in the way we do business. The provisions of the Code of Conduct reflect the values of our company and affirm the company's commitment to the highest standards of integrity and ethics in the conduct of our business.

We demand the same high standards from our business partners and consider whether a prospective partner's values align with our own when making contracting and supplier decisions. As Airtel Africa employees we must avoid situations where personal interests conflict, or even appear to conflict, with the interests of the company such as refraining from giving or receiving gifts and hospitality that may be construed as bribery.

Airtel Africa strives to keep a safe work environment by protecting the health, safety and wellbeing of our customers, employees, partners and the communities we operate in at large. We have a zero-tolerance approach towards sexual harassment, modern slavery, human trafficking, child labour and forced labour and expect the same from our business partners. As an equal opportunity employer, Airtel Africa treats all employees fairly and we will conduct our business in a way which respects human rights.

Areas Covered:

1. Respect for human rights
2. Harassment free workplace
3. Conflict of interest
4. Health and safety
5. Gifts and hospitality

Protect assets and financial integrity of the company

The protection & efficient use of company assets is the joint responsibility of all Airtel Africa employees. Company assets include data, computers, phones, data centres and towers. Any involvement in dishonest financial reporting and accounting of Airtel Africa or any third party may not only entail disciplinary sanctions but also result in criminal charges.

Areas Covered:

1. Integrity of accounting records and financial / non-financial information
2. Physical assets and Intellectual property
3. Confidentiality
4. Data privacy

Respect the laws of the land

Airtel Africa employees are required to comply with the laws and regulations of the countries in which we operate. However, as a multinational organization, we acknowledge that this Code of Conduct cannot adequately cover every aspect of ethical behaviour across every geography where we do business.

We therefore call on employees to exercise ethical judgment or consult your compliance manager and always act in compliance with applicable laws when confronted with specific situations that are not explicitly covered in this Code of Conduct. Where this Code of Conduct conflicts with local law or regulation, the more stringent recommendation should be applied. The company is committed to the principle of free enterprise and seeks to compete fairly. The company and our employees adhere to laws and regulations which are designed to ensure effective competition. Some employees, as part of their job roles, will become aware of information that is not publicly available and that may influence Airtel Africa's share price. Any employee in possession of such information is prohibited from using the information for personal gains or divulging the same to a third party. In line with our commitment to doing business with integrity, we exercise a zero-tolerance approach towards bribery and corruption. We denounce any/all forms of money laundering, tax evasion and helping others to evade tax and will always assist in any investigations to detect and penalize any money laundering activities or tax evasion.

Areas Covered:

1. Anti-bribery and corruption
2. Anti-money laundering & tax evasion
3. Insider trading
4. Fair competition
5. Tax evasion

Uphold respect in dealing with external partners

In our business dealings we expect our partners to adhere to business values and principles consistent with our own. As part of our values, we respect the communities with which we do business and we engage with them in ethical and meaningful ways.

Airtel Africa does not get politically involved or make donations to groups whose activities are of a political nature. However, we will promote and defend our legitimate business interests by co-operating with governments and other organizations, both directly and through third parties, in the development of proposed legislation and other regulations which may affect our legitimate business interests.

The views of the company will from time to time be solicited by the public, media, investor groups and analysts, stock exchanges on certain issues. We strongly discourage employees from speaking or writing on behalf of the company unless authorized to do so. Any solicitation of opinion must be directed to our company website or to the persons authorized to speak on behalf of the company.

Areas Covered:

1. Corporate social responsibility
2. Engagement with regulatory bodies
3. Political activity
4. Interacting with media
5. Engaging on social media

Our responsibilities



Integrity demands that each one of us takes personal responsibility for his/her conduct, ensuring that in our day to day work, our decisions, actions and relationships both with fellow employees and external stakeholders are consistent with, and guided by the principles and requirements covered by the Code of Conduct and other policies, guidelines and procedures of the company.

All employees must:

- Learn and understand the elements of the Code of Conduct
- Comply with the Code of Conduct and associated policies, guidelines and procedures
- Seek clarifications and assistance when in doubt
- Promptly report known/suspected violations
- Co-operate in investigations pertaining to alleged Code of Conduct violations

All managers, over and above their responsibilities as employees, must also:

- Build and maintain a culture of compliance
- Actively work towards preventing and detecting problems and issues of compliance
- Respond expeditiously to issues as they emerge (investigate/resolve)
- Follow communication and reporting guidelines as set out in the Code of Conduct.

Who is covered by the overarching Code of Conduct?

The provisions of the Code of Conduct apply to all Airtel Africa employees (whether permanent or temporary) working for Airtel Africa & its subsidiaries (as well as board members).

Reporting misconduct

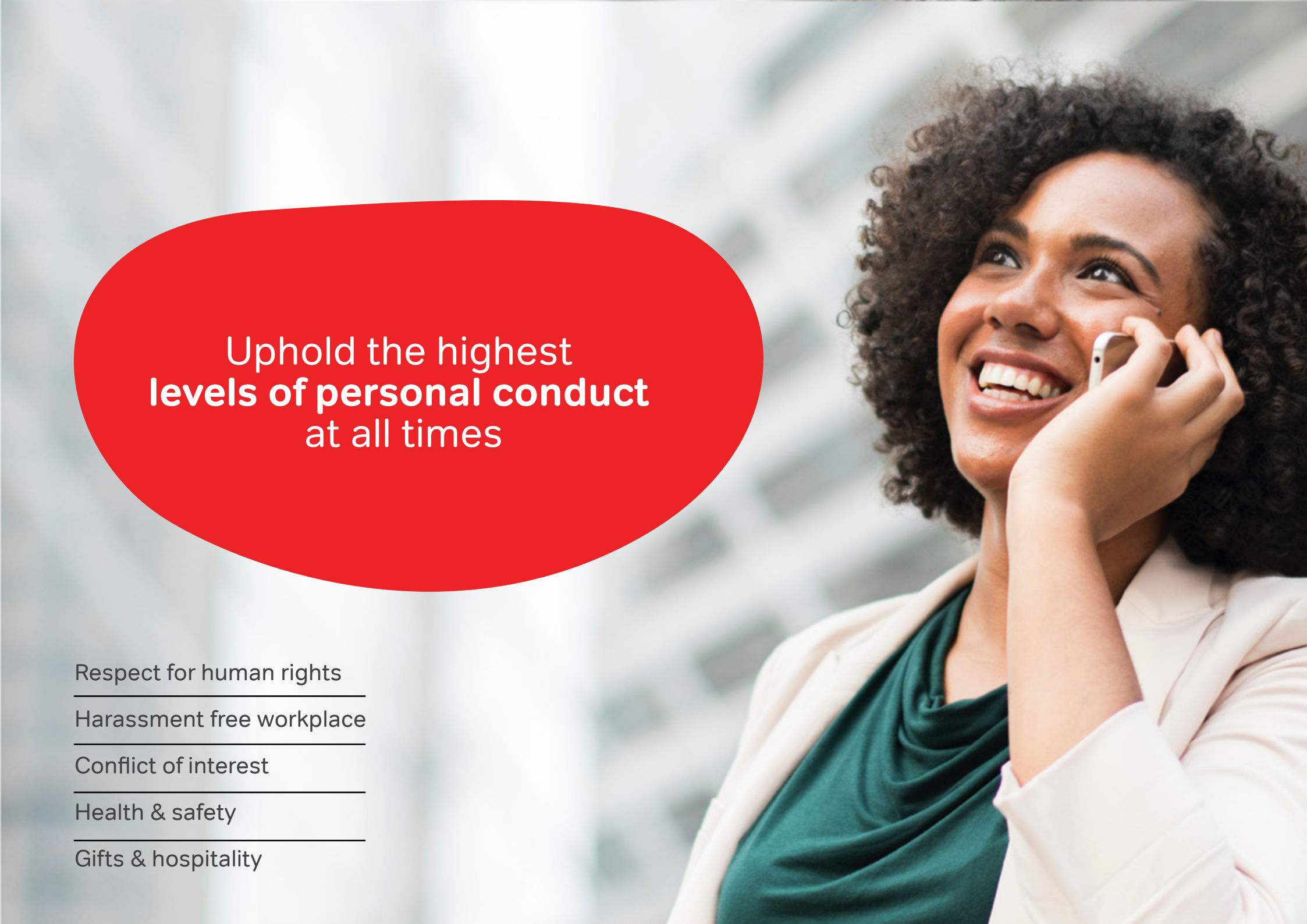
Our obligation to observe the highest standards of personal integrity is more than just an individual responsibility. You also have an obligation to speak up when you see others failing to act with integrity or violating our Code of Conduct.

Non-victimisation

We understand that you may be apprehensive about reporting misconduct. We adhere to a strict policy of non-victimisation for misconduct reported in good faith, even if your concern turns out to be mistaken.

You should never fear victimisation or dismissal for making good faith reports of misconduct or suspected violations of our Code of Conduct.

Refer to the Ombudsperson policy for details.



Uphold the highest
levels of personal conduct
at all times

Respect for human rights

Harassment free workplace

Conflict of interest

Health & safety

Gifts & hospitality

Respect for human rights



Objective

Airtel Africa recognizes that we can scale new heights only when we operate in an environment where we promote and protect human rights.

We are committed to respecting & upholding human rights in our operations and ensuring that our employees and business partners at all times, respect the human rights of the colleagues and associated partners that we interact and work with.

We are committed to provide an inclusive culture and work environment where each employee has an equal opportunity to reach his/her maximum capacity. We encourage cultural inclusion and diversity in our workforce.

Code

We will conduct our business in a way which respects human rights. We are committed to combatting any form of slavery, trafficking, child labour, forced labour, inhuman treatment or working

conditions that are a threat to life or hinder the physical, emotional and/or mental wellbeing of a person. At Airtel Africa, we ensure that all of us embrace the strength of our differences.

We provide equal access to opportunity and treat each other with respect and care. We foster sensitivity and open communication and measure performance of employees only on the basis of their achievements and contribution towards organizational objectives. We are focused on building a workplace that promotes diversity and appreciates individual differences.

We require that our business partners also abide by these commitments, and monitor our business partners' commitment to respect for human rights on an ongoing basis.

Dos

- Be alert to any signs of modern slavery or human rights abuses in our own operations or in our supply chain and report these to your Compliance manager.
- Require business partners to commit to respect for human rights in compliance with this Code of Conduct and consider commitments to respect for human rights when selecting new business partners.
- Treat people as individuals – respecting their identity – even when it is different from your own.

- Decisions relating to recruitment, training, promotions and opportunities for career growth are based on merit: a person's qualifications, experience and performance
- Performance judged on objective criteria and defined goals

Don'ts

- Work with any companies or individuals who you know or believe to be committing human rights abuses.
- Discriminate on the basis of gender, race, religion, disability, ethnicity, marital, family status, nationality, sexual orientation or any other characteristic(s).
- Make assumptions about any employee or work group
- Avoid people because they are not similar to you



Harassment free workplace

Objective

Airtel Africa, is committed to being a respectful workplace which recognizes and appreciates differences and treats all its employees with respect and dignity. Airtel Africa provides a consistent standard of protection from threats, harassment and discrimination or any other intimidating behaviour to all of its employees.

Code

We are an equal opportunity employer and are committed to creating a safe and conducive work environment that enables employees to work without fear of prejudice, gender bias and/or sexual harassment. We strictly prohibit sexual harassment or any other form of harassment.

We do not tolerate any threats of harm - either direct or indirect - or any conduct that harasses, disrupts or interferes with another employee's work or performance, or creates an intimidating, hostile work environment.

Dos

- Respect the right of every employee to a harassment-free workplace
- Your behaviour must be conducive to promote a harmonious and productive atmosphere in the workplace
- If you observe any form of harassment even if you are not the target, you must report the matter to your seniors in the organization or the Ombudsperson

Don'ts

- Conduct yourself in a manner that is uncomfortable to others
- Exclude/boycott a person from office related social activities or team work without just cause; this may also constitute harassment
- Be insensitive to a person's social environment in the work place
- Indulge in any form of harassment



Conflict of interest

Objective

Conflict of interest is a situation in which a person is in a position that he is likely to derive personal benefit financially or otherwise from knowledge gained, or actions or decisions made in their official capacity.

Code

If you find yourself in a position where your personal and organization interest come in conflict, you have to report such conflicts of interest, whether actual, apparent or potential, to the line manager and/or Compliance manager.

Airtel Africa employees shall at all times maintain high standards of business ethics and integrity, making decisions and carrying out activities that keep the best interests of the company over self-interest or personal gain.

Dos

- Inform the company if you, or an immediate family member, has any significant interest with an Airtel Africa supplier, consultant, competitor or any other partner
- Inform the company if you serve as a Director or consultant with any company that does business with Airtel Africa

Don'ts

- Undertake any work, paid or unpaid, with any other organization, outside of Airtel.
- Let your business decisions be influenced, or appear to be influenced, by personal or family interests or friendships
- Use company property, information or assets for personal benefit or the benefit of others
- Misuse company's resources or name to promote an external activity even if for a charitable cause and done for free



Health & safety

Objective

Airtel Africa recognizes that sustainable business leadership can only be achieved through a productive workforce, operating in a safe and healthy environment. The company therefore devotes necessary effort and investment in ensuring the physical health and safety of all its employees, and business associates operating within any of its office locations and facilities.

Airtel Africa also ensures that in the conduct of its activity, its impact on the environment is minimized.

Code

Health and Safety is an essential part of risk management and is given utmost priority at Airtel Africa. It is the responsibility of everyone to maintain a clean and organized workspace that does not present any hazard to oneself, colleagues, customers or other partners/visitors, as well as neighbours.

Dos

- Report circumstances that might lead to health and safety risks to employees or the general public, for timely corrective action, ensure full compliance to the safety/security policies, procedures and guidelines
- Comply with any travel restrictions that may be notified such as temporary unsafe places e.g. areas of conflict or natural disaster

Don'ts

- Consume or be under the influence of alcohol or drugs during working hours
- Carry weapons of any kind to the workplace
- Perform illegal activities (such as gambling / betting) on company premises, or use company property for such purposes
- Interfere with, or misuse assets provided by the company in the interest of health, safety or security

Gifts & hospitality

Objective

Airtel Africa maintains a reputation of a transparent, best-in-class company that acts with integrity and bases its decisions only on legitimate business considerations. In building and maintaining relationships with our various stakeholders, employees must uphold the highest standard of business and personal ethics.

Code

Gifts and entertainment should never be offered or accepted with the intention to influence – or appear to influence – business decisions or relationships in any way. Receiving gifts, inappropriate entertainment or any other gratuities from people with whom we do business, are generally not acceptable, because doing so could imply an obligation that is best avoided.

Dos

- Entertainment incidental to the normal course of business is acceptable, such as a regular meal
- Gifts of symbolic nature, such as trophies and statues that are inscribed in recognition of a business relationship, may be accepted
- All gifts along with their estimated value must be reported in writing to your Compliance manager

Don'ts

- Accept any personal favour or entertainment, such as paid for holidays or dinners outside scope of normal business, for yourself or your family

- Attend any event which includes paid for travel and/or accommodation, unless sanctioned by the relevant seniors in the organization.
- Accept gifts in exchange for doing, or promising to do anything for a supplier or customer, worth more than \$100 or a value lower as per local law

Refer to the Anti-Bribery & Anti-Corruption Policy



Protect assets
and financial integrity
of the company

Integrity of accounting records
& financial/Non-financial information

Physical assets & intellectual property

Confidentiality

Data privacy

Integrity of accounting records & financial/Non-financial information



Objective

Accurate reporting of financial and non-financial information helps management in making the right decisions, builds trust with our external stakeholders and helps us in meeting our legal and regulatory obligations.

It is fundamental to who we are as a responsible organization.

Code

All financial and non-financial information which the company maintains internally for the purpose of management's planning, control and decision making or externally for the purpose of meeting our obligations to external stakeholders must be accurate, reliable and free of bias.

Adequate measures should be taken to ensure all information reported is objective, complete and a true reflection of the actual performance. Care must be taken to comply with all statutory and regulatory requirements. Deliberate falsification of records is considered a fraud and may result in criminal liability.

Dos

- Ensure that all business transactions are properly approved in accordance with company policies or delegation of authority and are accurately recorded

- All financial and accounting transactions must conform both to the company's approved accounting policies and to generally accepted accounting principles (GAAP)
- Respond promptly, accurately and with full disclosure to agencies who legitimately request information, after verifying with your supervisor
- Be aware of the record retention procedures and legal requirements including how data is to be stored and retrieved

Don'ts

- Discard or destroy original copies of any company records and documents without authorization, especially those that are within the record retention time-frame as per company policy or applicable local law.
- Provide incorrect or incomplete information to senior management for making business decisions
- Falsify or deliberately provide false information to any authority

Physical assets & intellectual property



Objective

It is our responsibility to protect and safeguard the company's assets including physical assets, financial assets and intellectual property.

Code

All company assets must be protected against waste, damage, misuse, theft and misappropriation and must be used principally for the business of Airtel Africa. The company reserves the right to monitor and track the use of all company assets, including company vehicles etc.

Dos

- Be conscientious in the use of company assets
- Protect the company's financial assets such as cash, bank accounts and ensure adequate procedures are in place to prevent misuse or fraud
- Safeguard your password. Password sharing is prohibited as per our IT Security policy
- Be vigilant against cyber-attacks including phishing scams and report any incident immediately to IT. Don't open any attachment or emails which appear suspicious. Adhere strictly to all instructions issued from time to time by the IT security team

- Protect the company's intellectual property. Don't share the company's proprietary software with external parties or use for personal purposes

Don'ts

- Use the company's assets for personal use. Only incidental personal use is permitted in limited circumstances
- Use unlicensed software on the company's computers thereby violating the intellectual property of third parties. When in doubt, please contact your local IT Manager

Confidentiality



Objective

Information is a very important company asset and adequate measures must be put in place to protect all information which we come across in our day to day work from being used for unintended purposes. Confidentiality of company information helps us maintain the trust of our stakeholders.

Code

All employees are expected to exercise extreme vigilance in protecting the company's information and ensuring that it is not transmitted to unauthorized persons or for unauthorized use. Due care must be taken at all times to maintain confidentiality of personal information, commercially sensitive information and trade secrets relating to the company, its employees or customers.

Dos

- Maintain a 'clean desk policy', ensure that confidential information is not accessible to unauthorised individuals at all times
- Access to confidential company information should only be provided to employees who require it to perform their work

- Be very vigilant when sending information, both in physical or electronic form to prevent sharing information with unintended persons
- When in possession of price sensitive information, do not use this information for personal use.

Don'ts

- Disclose or share confidential information relating to the company
- Speak to the media except when you are authorized to do so. Only authorized spokespersons are permitted to speak on subjects relating to the business with the media or external parties
- Share sensitive company data on unauthorised file transfer protocol/ websites and personal email
- Share non-publicly available company information in public conversations, social media or other forums

Data privacy



Objective

Privacy is at the heart of our relationship and social contract with our customers. We are committed to protecting data privacy of our customers and employees in line with best practices and local legislations.

Code

Adequate safeguards should be put in place to protect and safeguard personal information of customers or employees irrespective of the format in which the information is stored. Collection, storage and transmission of personal information should be in accordance with Data Privacy laws and best practice of the company.

Dos

- All employees must understand and comply with applicable Data Privacy laws in the countries in which they operate. Where in doubt, please consult your line manager or Compliance manager
- Ensure that all requests for personal information from law enforcement agencies are appropriately authorized by the legal department before the information is shared
- If you inadvertently receive information which is confidential in nature,

immediately notify your line manager. Do not share or forward such information

- Adequate safeguards should be put in place to protect personal and confidential information in accordance with best practices and local law/regulations
- Comply with applicable Data Privacy laws with regards to cross border data transfer

Don'ts

- Disclose personal information of customers or employees with unauthorized persons both within or outside the organization



Respect the laws of the land

Anti-bribery & corruption

Anti-money laundering and tax evasion

Insider trading

Fair competition



Anti-bribery & corruption

Objective

Bribery and corruption is generally a form of dishonesty or criminal activity undertaken by a person or organization entrusted with a position of authority, often to acquire illicit benefit.

Code

Airtel Africa has zero-tolerance to bribery and corruption. Consequently, Airtel Africa employees shall at all times act with integrity ensure that all decisions are based on legitimate considerations. In building and maintaining relationships with various stakeholders, employees should focus on creating trust and mutual respect based on the principles laid down in this Code of Conduct.

Dos

- Always make it clear to all third parties that Airtel Africa has zero-tolerance to bribery and corruption
- Accurately reflect the true nature of transactions and expenditure to ensure improper payments are not made, offered, solicited or received
- Any breach or suspected breach should be reported to the Airtel Africa Ombudsperson

Don'ts

- Give, offer, solicit, extort, request or accept, directly or indirectly, anything that is, or could reasonably be considered as, a bribe. It is also considered as bribery if it is done indirectly or through any third party such as consultants, contractors, agents, sponsors or joint venture partners, advisors, customers, or suppliers
- Offer or give bribes, kickbacks or any other improper payments including facilitation payments to any public official, individual or third party

Refer to our Anti-Bribery & anti-Corruption policy

Anti-money laundering and tax evasion



Objective

Anti-money laundering refers to a set of procedures, laws and regulations designed to stop the practice of generating income through illegal actions or activities.

Terrorists, organized criminals and drug smugglers rely extensively on money laundering to maintain cash flow for their activities.

Anti-money laundering regulations generally require institutions engaged in commercial activities to complete due diligence procedures to ensure they are not aiding money-laundering activities.

Airtel recognises the importance of paying its own tax in accordance with all laws and regulations in the jurisdictions it operates. It also acknowledges the importance of its employees and other persons who perform services for or on behalf of members of the group, clients, suppliers and business partners all paying the taxes they owe, and so is committed to preventing the facilitation of tax evasion by any of these stakeholders. Such facilitation activity may be criminal behaviour and has no place in the group's business – there are no circumstances in which it may be acceptable, and no financial/commercial justification for ever becoming involved in such activity.

Code

Airtel Africa recognizes the consequences of participating in illegal activity and the conversion of illegal proceeds into legitimate assets. In this regard, Airtel Africa is committed to working with all relevant authorities in order to curb money laundering and tax evasion and to ensure that such practices do not happen in our organization through doing our own vetting/internal checks to ensure that all operations/transactions are legitimate. Airtel Africa is also committed to complying with all anti-money laundering and anti-tax evasion laws and regulations in the jurisdictions that it operates.

Accordingly, Airtel Africa expects all group staff to avoid involvement in any money laundering or tax evasion, including facilitating tax evasion by others, in the course of their employment. It operates a zero-tolerance policy for any failure to do so, which will be treated as a disciplinary offence. Airtel Africa further expects other persons who perform services for or on behalf of members of the group (including, without limitation, agents, intermediaries, joint venture partners, subcontractors and suppliers) to adopt the same standards in their own activities.

Dos

- Look out for irregular forms of transactions, that involve persons not privy to the transaction, or transactions that involve cash or foreign accounts outside of their customary practice

- Ensure that all third parties are subjected to screening and necessary identification documents are produced and copies retained before any commercial transactions are closed
- Look out for invoicing irregularities, overpayment and split payments over various payment platforms and methods
- Report any suspicious transactions to the Compliance & Ethics Officer at the earliest opportunity
- Any breach or suspected breach should be reported to the Airtel Africa Ombudsperson
- Formalise the expectation in its contractual relationships with persons who perform services for or on behalf of members of the group that they should not be involved in any money laundering or tax evasion

Don'ts

- Aid a customer, supplier or any third party transacting with Airtel Africa to avoid vetting by closing a transaction without the requisite documents
- Assume that third party vetting has already been done. Ensure/confirm that the same has been done because failure to do so may have far reaching implications for Airtel Africa
- Engage in any transactions that we know, suspect or have reason to believe involves tax evasion or the proceeds of illegal activities

Insider trading



Objective

Insider trading is the use of information that is not in the public domain and which a reasonable investor would consider important/material when making a decision on whether or not to trade in stocks or securities of a public company directly or indirectly.

In various countries this is illegal because it is deemed to be an unfair advantage to other investors who do not have access to such information.

Code

Airtel Africa supports fair and transparent trading of securities in all markets in order to encourage investor confidence in the securities market. Consequently, Airtel Africa employees shall not be involved in practices that are deemed to constitute insider trading either directly or through others such as friends, family as it is considered an abuse of the company's confidential information as well as a breach of their fiduciary duty.

Dos

- Keep company information confidential and take necessary steps to ensure that information is disclosed only by people authorized to do so
- Report to the Company Secretary, Compliance manager or Ombudsperson if they suspect there has been any leakage of confidential information or any form of breach

Don'ts

- Sell or buy securities of a listed company when they possess inside information or during the period immediately before material information such as the company financials, resignation/appointment of directors etc. is released to the public
- Advise or encourage friends or relatives to sell or buy securities of a listed company when they have inside information
- Originate/spread false information or engage in activities whose intention is to manipulate the securities of a listed company

Fair competition



Objective

Airtel Africa believes in fair business practices and encourages fair competition with all its business associates. Airtel Africa encourages all its employees to practice fair competition as provided by various laws and regulations.

Code

All representatives of Airtel Africa shall conduct business with its partners in accordance with relevant laws and regulations in the respective country and international best practices. Airtel Africa's employees shall not be part of any unfair business practices that could damage competition, which include misrepresentation to customers/potential customers, fraud, oppressive or unconscionable acts, anti-competitive agreements with competitors or other stakeholders, anti-competitive information sharing or practices to the detriment of our customers.

Dos

- Understand how competition rules could apply to you and ensure absolute compliance with the competition laws and regulations in the markets in which we operate in
- When interacting with or engaging the competition, ensure that the same is done in circumstances that promote/maintain a healthy competition spirit
- When seeking information relating to competitors, or engaging in any discussions with competitors, the same should be done within the prescribed laws and regulations

- When participating in industry activities that involve competitors ensure that the same are not used to promote anti-competitive practices and if such incidents happen, Airtel Africa representatives should raise their objections and remove themselves from the activities in question
- Report to the line managers any incidents that may be regarded as anti-competitive

Don'ts

- In the spirit of maintaining competition, you shall not seek to win business through deception, misrepresentation or inducement
- You should never seek, share or discuss confidential information with competitors (such as prices, costs and/or sales volumes)
- Employees shall not discuss with competitors or engage in any competitor forums which engage in any way in any fixing of prices or other terms for its products or prices to be demanded from suppliers, boycotts or refusals to deal with certain competitors, suppliers or customers, the allocation or division of customers, suppliers or markets
- Avoid unfair commercial practices that may drive competitors from the market, especially in markets where Airtel Africa is the largest operator



Uphold respect in dealing with external partners

Corporate social responsibility

Engagement with Regulatory bodies

Political activity

Interacting with media

Engaging on social media

Corporate social responsibility



Objective

Airtel Africa invests in locally relevant areas identified by internal and external stakeholders across the markets we operate in. As regards education, we prefer to invest in projects that utilize mobile technology/digital tools and platforms to improve education in schools. In regards to health, we invest in projects that preferably harness technology to improve or enhance health services.

Code

We define volunteering as any activity that involves spending time, unpaid and without expectation of financial gain, doing something that aims to benefit a community or the environment. Airtel Africa is supportive to employees doing individual and/or corporate charitable work in their communities, including organising events, collections and fund raising initiatives with colleagues. Those employees who choose not to volunteer or be involved in any volunteering activities will not be penalized.

The company's CSR projects are a platform to give back to the communities we serve and ensure we operate as a socially responsible business.

We openly communicate and provide information about our CSR programmes and their impact.

The media spokesperson is the Country Managing Director supported by the CSR Manager and HR Director

Dos

- Obtain approval from your line manager for any volunteering activity during working hours.
- Engage the relevant stakeholders in new projects from the outset to ensure that any material issues or concerns are addressed before commencing with such projects, particularly where a project will impact on a community
- Share progress of any volunteering initiatives that you are involved in with the CSR Manager
- Respect confidentiality clauses in respect of sharing Airtel Africa's proprietary business information and tools with charity or community organisations
- Respond to all written comments to stakeholder

Don'ts

- Engage or undertake in an activity that is harmful to the environment
- Engage or undertake in an activity that is controversial or against the law
- Engage or undertake in projects that marginalise race or gender
- Engage or undertake in initiatives that support religious groups where the purpose is furthering religious doctrine
- Engage or undertake in an activity that benefit individuals rather than a group, community or institution
- Make any donations to political parties or political candidates or religious groups or religious associations

Engagement with Regulatory bodies



Objective

This section of our Code of Conduct provides guidance on how contact with regulatory bodies must proceed. Regulatory bodies include, Governments, Government Departments; local and other administrative authorities; regulators, legislators, industry associations. Regulatory bodies may be global or international; regional, national; or active at a local community level.

Code

Interaction with regulatory bodies must only be made by authorised individuals. This covers all forms of interactions, whether formal, informal or social interactions that are related to Airtel Africa's business including any kind of person to person interaction in meeting or via electronic media.

Meetings and other interactions with regulatory bodies

There are various departments within government i.e. ICT ministry, regulatory bodies, finance ministries or tax bodies. Any contact with these bodies on behalf of Airtel Africa business in a country must have the prior approval of the relevant Functional Director.

The relevant Functional Director in each country must ensure that all engagements of a local nature with the local bodies are done with the prior approval of the Managing Director of the local entity.

Written Communication

The local Regulatory Affairs Director shall be the point of contact with the regulatory bodies. No employee shall write directly to any regulatory body. All such communication must originate from the Regulatory Affairs Department. This policy statement shall not cover communication with Tax authorities in the ordinary course of business which shall be managed by the relevant OpCo Finance Directors or Tax managers and their teams.

Dos

All engagement and communication with regulatory bodies must;

- Be courteous, open, transparent and auditable.
- Truthful, accurate and not misleading in any manner.
- Be recorded for future reference.

Don'ts

- Engage with a regulatory body except in accordance with the terms of this Code of Conduct.
- In the course of engagement with regulatory bodies on behalf of Airtel Africa, do not engage in behaviour that would appear or be capable of being perceived as intended to improperly influence the regulatory bodies in their decisions about Airtel Africa.
- Do not be rude or offensive in any engagement with regulatory bodies.



Political activity

Objective

Airtel Africa encourages its employees to be responsible and enlightened nationals and fulfill their citizen duties. However, our employees can exercise their right to engage in national, state or local politics only in personal capacity. Airtel Africa does not support or contribute to any political parties or candidates. Employees need to clarify that their political actions and views are personal and in no way represent that of the company.

Code

Employees should not make any contribution of company funds, property or services to any political candidate, party or committee. They must not put pressure or solicit other employees to make political contributions or participate in support of a political party or candidate. All political activity by the employee needs to be undertaken in their own personal time and using their own resources.

Dos

- Treat all political activities as personal and private in nature
- In case you or your family member is planning to seek or accept a public office or if any other political activity might have an impact on Airtel Africa brand reputation or operations or your job, inform the company of the same as soon as possible

Don'ts

- Use company funds or resources to support any political candidates or party
- Reimbursement for any political activities are not permissible - they are expenses of a personal nature

Interacting with media



Objectives

We endeavour to be open and transparent in our communication to ensure that our external stakeholders are kept informed. We are also committed to providing accurate and timely information, thereby safeguarding the company's reputation. All our interactions with media will be with an aim to inform our stakeholders and build our brand reputation.

Code

The Corporate Communications department is the channel to present and share company information to all media. The Airtel Africa's Media Policy outlines how interaction with media should be handled.

Dos

- Corporate Communications needs to be involved in all media engagements, formal as well as informal. All media interactions from interviews to press conferences should be planned and organized by Corporate Communications. If you receive a call from the media, please refer it to Corporate Communications
- Refrain from talking about 'future plans or strategies' and making 'forward looking statements' on expected results, revenue guidance, strategic plans and investments
- With respect to listed companies, only information available in the public domain like annual and quarterly results can be shared with the media. No other financial details related to the company are to be shared with any media. As policy, we do not disclose financial information related to OpCos
- Inform Corporate Communications about any leak of confidential information to media. Do not attempt to coerce the journalist into stopping the story or not using the information
- Spokespersons are only permitted to speak on subjects that relate to their business domain/geographical area and on issues & topics related to them

Don'ts

- Share company data, future plans or strategies at external industry events, without approval from Corporate Communication team.

If you are approached by the media in these public events, please politely request them to get in touch with Corporate Communications for their queries and meeting requests

- Any new product or service launch or partnership tie-up that is still in discussion stage, pre-launch stage or testing stage should not be commented upon. Media activity should happen only after the legal agreement is signed and the same is ready for announcement
- Talk about on any religious, social or political issues
- Comment on matters of government policy, without consultation with Corporate Communications
- Give an opinion on or discuss the competition's services, products or strategies or get coerced into reacting and commenting on the competition
- Encourage personality-based interviews highlighting personal lives, hobbies, interests etc. Spokespersons should participate only in company related features that focus on enhancing the brand and the operations.

Refer to our Media Policy (and guidelines)

Engaging on social media



Objective

The phenomenal growth of online social networks e.g. Twitter, Facebook, LinkedIn, Instagram, etc. and leading Instant Messaging services (WhatsApp, WeChat, Viber etc.) is altering the way people communicate, share ideas and disseminate information.

We encourage our employees to participate in social media in a manner that does not expose the company to risks including damage to corporate reputation, legal issues, productivity loss and excessive use of bandwidth, amongst other issues.

Code

We have to be cognizant of the fact that social networking sites are today being followed/seen by customers, regulators and colleagues. We encourage our employees to be our brand ambassadors but it needs to be done in accordance with the rules specified and outlined in the Media Policy (and guidelines).

Dos

- Exercise good judgment / caution on anything you post on social media platforms
- Mind your language: while using social media, please do not be irresponsible/disrespectful

- When in doubt, connect with the Corporate Communications Team

Don'ts

- Speak about competition on the internet, (which includes blogs or personal social media accounts (Facebook, Twitter, Instagram etc.)
- Make comments that are racist, sexist, political in nature. The rule of thumb being - avoid anything that may hurt the sentiments of a group or community
- Avoid harassing, defamatory or disparaging content
- Respect the brand that you stand for. Do not abuse, malign, misuse or misrepresent the brand visually or otherwise. Please engage with your respective Corporate Communications Team and remember to state/use a disclaimer - "my posts are my own"
- Upload visuals of employees indulging in improper behavior/actions in place of work/outside with company logo/ wearing clothes that are branded

Refer to our Media Policy (and guidelines)

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