



SUPPLIER CODE OF CONDUCT

Purpose:

Emtel Ltd is committed to integrity, respect for the law and going beyond the law to advance social and environmental responsibility. The purpose of this Supplier Code of Conduct is to assure that our Suppliers share **Emtel Ltd's** commitment to such responsible business practices.

Scope:

This Code of Conduct is to be accepted and applied by international and local Suppliers, including distribution contractors.

Content:

- A) Ethics and integrity
- B) Workers' rights
- C) Workers' protection
- D) Prohibition of child labor
- E) Environmental Protection
- F) Monitoring the compliance to the Code of Conduct

A) Ethics and integrity

Emtel Ltd Suppliers must commit themselves to the highest standard of ethical conduct and integrity. The promotion of business ethics and the fight against corruption are not only the right thing to do; they are also key elements of long term business development.

1) Integrity

Corruption, extortion and embezzlement are strictly prohibited. Suppliers must not offer or accept any bribe or other means of obtaining undue advantage.

Any actual or attempted violation by a Supplier may result in termination as an **Emtel Ltd** Supplier and legal action.

2) Gifts and gratuities

Emtel Ltd employees are prohibited by our Code of Ethics from asking for or accepting any money, object of value or preferential treatment from any current or prospective **Emtel Ltd** business partner. **Emtel Ltd** employees may only accept business-related meals, entertainment, token gifts or favors when the value involved is not significant and clearly will not place them under any actual or perceived obligation to the donor. The value of any such individual gift may not exceed the higher of USD 150 or EUR 100.

Offering gifts or gratuities that would cause an **Emtel Ltd** employee to be in violation of these rules is a violation of this Supplier Code of Conduct. In addition, **Emtel Ltd** Suppliers are required to report to **Emtel Ltd** any request by an **Emtel Ltd** employee for gifts or gratuities in violation of this policy.

3) Protecting Confidential Information

Suppliers may receive or encounter information about **Emtel Ltd's** business activities, contracts, projects, structure, financial situation or performance. Such confidential information must not be disclosed to any third party without prior written permission from **Emtel Ltd**. Disclosure of such information to employees of the Supplier must also be restricted to those who have a need to know such information and in accordance with applicable regulations and prevailing industry practices.

4) Intellectual Property

Suppliers must actively support and respect intellectual property rights, regardless of the existence and effective application of local regulation. Suppliers may not advertise any contract with **Emtel Ltd** without prior written approval from **Emtel Ltd**.

5) Fair business practices

The Supplier must uphold standards of fair business, advertising and competition and ensure that information provided to customers is not misleading.

6) Whistleblower policy

Emtel Ltd and the Supplier will maintain policies that protect the confidentiality of whistleblowers who may raise concerns about ethical or legal issues within **Emtel Ltd** or the Supplier.

7) Community engagement

Emtel Ltd encourages the Supplier to engage in the communities where it operates to promote social and economic development.

B) Workers' rights

1) Universal human rights

Suppliers must respect and promote universal human rights as stated in the United Nations' Universal Declaration of Human Rights. The Supplier must ensure that it neither knowingly assists a State in violating human rights, nor benefits from human rights abuse by a State or by their private or public security forces.

2) Harsh treatment and harassment

The Supplier's workers will never suffer, or be threatened to suffer any kind of inhumane treatment, including corporal punishment, coercion, verbal abuse, sexual harassment or sexual abuse.

3) Involuntary labor

The Supplier may not use any form of forced labor, debt bondage or involuntary prison labor. Employees and contractors should be free to leave work or terminate their employment with the Supplier after a reasonable notice period. Workers will never be deprived of their identity documents or work permits by their employer or contractor.

4) Working hours

The Supplier will respect local laws regarding daily and weekly working hours, including laws concerning maximum overtime. Workers must also benefit of at least one full day off per week.

5) Wages

Workers must be paid timely at a rate equal or greater to the local minimum wage. All overtime must be compensated according to local law. Salary deductions as disciplinary measures are prohibited.

6) Equal opportunity employment

The Supplier must not discriminate against any worker based on color, ethnicity, religion, political affiliation, sexual orientation, gender, age, union membership or marital status in any hiring or employment practices, including in the access of employees to promotion, rewards and training. To the contrary, the Supplier must acknowledge the added value of diversity in the workplace and encourage under-represented groups (such as women, minorities, disabled persons, etc.) to join the company.

7) Health status and privacy

The Supplier will not seek unnecessary information on the health of workers or potential workers, by any means. Nevertheless, if the Supplier receives information about the health status of workers or potential workers, the Supplier will abstain from communicating them to any third party. Discrimination, harassment or dismissal of workers on the basis of their health status, especially HIV status, is prohibited.

8) Freedom of association

The Supplier must respect the right of workers to freely create or join a labor union of their choice, without suffering any kind of discrimination, intimidation or harassment, in accordance with local law.

C) Workers' protection

1) Protection from occupational hazards

All workers must be efficiently protected from safety hazards at the workplace and during their professional travels. All relevant risks must be identified and mitigated through proper design, engineering and administrative controls, preventive maintenance and safe work procedures. If still necessary, workers must be provided with the appropriate personal protection equipment. Workers will not be discouraged to raise safety issues.

Workers using machinery will be protected through an appropriate design of the machine (physical guards, interlocks, barriers, etc.), training and preventive maintenance.

The exposure of workers to biological, chemical and physical hazards, including radio frequency fields, will be identified, measured and mitigated. When necessary, workers will be provided with the appropriate personal protection equipment.

When procuring safety-sensitive products or services, **Emtel Ltd** may request tender applicants to provide a detailed list of workers protection measures, as part of their submission and contractual commitments.

2) Emergency preparedness

The Supplier will also protect its workers from identified emergency risks (like fire, flooding, hurricane, war, etc.) by adopting appropriate emergency plans, security equipment and evacuation procedures.

3) Occupational injuries and illnesses

The Supplier will effectively track and record the occupational injuries and illnesses of its workers. It will encourage workers to declare such injuries and illnesses, and provide them with the appropriate treatment. The Supplier will also search and mitigate the causes of these harms.

D) Prohibition of Child Labor

1) Objective

Education for all children is essential to long term development.

Emtel Ltd's mission is to provide "freedom to access today's world for people in emerging markets".

The access of children to education forms part of the foundation essential to the achievement of this mission. Therefore, **Emtel Ltd** is particularly concerned about child labor. For more information about **Emtel Ltd's** policy on child labor, please refer to the corresponding Position Paper.

2) Banning child labor

Emtel Ltd prohibits the use of child labor in our operations, our distribution network and in the manufacturing or execution of the products and services we purchase.

Following ILO and UNICEF recommendations, and **Emtel Ltd's** Position Paper, children must not be employed by the Supplier and its own direct Suppliers unless they have reached the greatest among:

- local minimum school leave age
- local minimum employment age
- the age of 15.

3) Physically demanding and hazardous work

Physically demanding and hazardous labor is prohibited for anyone below the age of 18.

E) Environmental protection

In line with UN's Rio de Janeiro Declaration, the Supplier should acknowledge that "in order to achieve sustainable development, environmental protection shall constitute an integral part of the development process and cannot be considered in isolation from it."

Therefore, the Supplier should strive to minimize the adverse environmental impact of its products and services during the whole product life cycle: production, transport, use and disposal or recycling.

1) Permits and reporting

The Supplier must have all the required updated environmental permits and comply with all local environment reporting requirements for all its activities linked to **Emtel Ltd**: manufacturing, transportation and local operations.

2) Waste reduction and treatment

The Supplier must work to reduce or eliminate the waste produced by all its activities. This goal will be achieved through the improvement of production, maintenance and cleaning processes, modes of conservation and transportation, as well as the substitution, re-use and recycling of materials. Liquid wastes and wastewater must also be reduced, properly treated and controlled before being discharged.

3) Dangerous substances

Chemical substances and other materials that could cause damage if released in the environment must be identified and declared to local authorities when required. They must be stored, transported, handled and disposed of in a way that minimizes the risk of release in the environment.

Emtel Ltd complies with the European Directive on the Reduction of Hazardous Substances (ROHS) and therefore requires its Suppliers to also comply with it and ban the following substances from their electrical and electronic products (excepted batteries): lead (Pb), cadmium (Cd), mercury (Hg), hexavalent chromium (Cr VI), polybrominated biphenyls (PBB's), and polybrominated diphenyl ethers (PBDE's).

4) Gas emissions

During the manufacturing of goods, all emissions of volatile organic, acid or corrosive chemicals, of aerosols, particles, ozone depleting gases and combustion by-products must be monitored, controlled and properly treated.

5) Product content restrictions

The Supplier must adhere to all local and international regulations regarding prohibition or restriction of specific substances, as well as labeling laws, recycling and disposal laws.

6) Electronic and radio equipment

Most products procured by **Emtel Ltd** consist of electric, electronic and radio equipment for its networks and offices. In the procurement tenders of such equipment, **Emtel Ltd** will pay a particular attention to the energy consumption and environmental impact during the whole product life cycle. Therefore, the Supplier is encouraged to develop products that feature:

- A low energy consumption and environmental impact during their manufacturing, delivery and installation
- A low energy consumption in operation
- An improved resistance to high temperatures (thus decreasing the need for cooling)
- A lower content of hazardous components
- A design that facilitates the recycling.

F) Monitoring the compliance to the Code of Conduct

The Supplier should set up a management system to ensure compliance with applicable laws and regulations and this Supplier Code of Conduct. This management system should include:

1) Company commitment

An official and public statement of the company that affirms the commitment to comply with applicable laws, regulations and **Emtel Ltd's** Supplier Code of Conduct.

2) Identified responsibilities

An organizational chart that clearly identifies responsibilities and accountabilities regarding customer requirements, including this Supplier Code of Conduct.

3) Risk Management Process

A process to identify, measure and manage all business risks, particularly the ones mentioned in this Supplier Code of Conduct and regarding safety, health, labor practices, environment and ethics.

4) Audit, written records and communication

Written records that demonstrate the commitment of the Supplier to a continuous improvement: standards, performance targets, implementation plans, periodic assessments, audits and self-evaluations, remediation and improvement plans. The actual performance of the Supplier related to this Code of Conduct should be regularly communicated to the employees and to Emtel Ltd.

5) Training

A training program for managers and workers related to the compliance to this Supplier Code of Conduct and the continuous improvement approach.

6) Worker participation

A process to collect and take into account employees' input and feedback on all issues related to this Supplier Code of Conduct.

7) Correction of deficiencies

A process for prompt correction of any deficiencies identified by internal or external sources regarding the requirements of this Supplier Code of Conduct.

8) Documentation and records

Creation of written records to document compliance with this Supplier Code of Conduct and documentation describing issues found and corrections made to Supplier processes.

References

Currimjee Code of Conduct.

<https://www.currimjee.com/media/guloo5du/code-of-conduct.pdf>

Emtel Ltd corporate values

<https://www.emtel.com/about-us/company-profile>

Emtel Ltd Privacy Notice

<https://www.emtel.com/privacy-notice>

Universal Declaration of Human Rights

www.un.org/Overview/rights.html

United Nations Global Compact

www.unglobalcompact.org

United Nations Convention Against Corruption

www.unodc.org/unodc/en/crime_convention_corruption.html

ILO International Labor Standards

www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm

ILO Code of Practice in Safety and Health

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

OECD Guidelines for Multinational Enterprises

<http://www.oecd.org/dataoecd/56/36/1922428.pdf>

SA 8000 Social accountability standards

http://www.sa-intl.org/_data/n_0001/resources/live/2008StdEnglishFinal.pdf

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