



AIRTEL AFRICA PLC
MODERN SLAVERY POLICY STATEMENT
FINANCIAL YEAR ENDED 31 MARCH 2024

This statement relates to the financial year ended 31 March 2024, describing Airtel Africa's approach to assessing and addressing the risk of modern slavery in connection with our business and supply chains.

It is published by Airtel Africa plc (the "Company" or the "Group") and its relevant subsidiaries in compliance with the UK Modern Slavery Act 2015.

1. ORGANISATIONAL STRUCTURE AND SUPPLY CHAIN

Airtel Africa plc is a public limited company listed on the London Stock Exchange (LSE) and on the Nigerian Stock Exchange (NGX) and is a constituent of the FTSE 100 index.

The Company, together with its direct and indirect subsidiaries, has operations in Africa, where it is a leading provider of telecommunication and mobile money services. The Group has a presence in 14 countries in Africa, primarily in East Africa and Central and West Africa with a footprint of 80.4% of the population across sub-Saharan Africa.¹

As of 31 March 2024, the Group was either the first or second largest operator by number of subscribers in 14 markets of presence in Africa and served an aggregate of 157.2 million total customers.²

The Group's business comprises three elements: mobile voice, mobile data and mobile money (Airtel Money). Within the Group, the mobile voice business comprises pre-paid and post-paid wireless services, international roaming services and fixed-line telephone services. The mobile data business offers 2G, 3G, 4G and 5G data services. Both the mobile voice and mobile data services are delivered by several direct and indirect subsidiaries (including other telecommunication companies).³ As part of the mobile money business, the Group, in partnership with local financial institutions, provides mobile commerce services that enable customers, among other services, to send and receive money, make payments for utility bills and deposit money through linked bank accounts (in certain countries).

The Group leases and owns extensive tower infrastructure and fibre cables across its territories and continues to develop, maintain and operate its equipment on leased towers. In addition, the Group includes a subsidiary submarine cable company through which the Group has access to submarine cables in the Republic of the Congo and Tanzania to support the provision of international voice and data services.

Airtel Africa works with over 2,700 partners and suppliers. In terms of significance, the top 100 vendors contribute approximately 87% of the total value of procurements and we regularly engage with our partners and suppliers covering a broad variety of matters.⁴

¹ Airtel Africa plc Annual Report and Accounts 2024, page 2

² Airtel Africa plc Annual Report and Accounts 2024, pages 1 and 10

³ Airtel Africa plc Prospectus dated June 2019, pages 2 and 4

⁴ Airtel Africa plc Annual Report and Accounts 2024, page 120

2. POLICIES ADDRESSING SLAVERY AND HUMAN TRAFFICKING

The Company is a signatory to the United Nations Global Compact (UNGC) and is wholly committed to meeting its fundamental responsibilities in the four key areas: human rights, labour, environment and anti-corruption. Our CEO reaffirms our continued support to the Ten Principles of UNGC annually.

Additionally, our sustainability strategy, published in October 2021, is aligned with six of the United Nations Sustainable Development Goals (UN SDGs) and supported by goals and active policies to respect human rights, drive positive social impacts, protect the natural environment and conserve resources.

Ethical behaviour is vital in the Group's operations and conducting business responsibly with regard to their customers and partners is fundamentally important to all Group companies. Our 'AIR' values – Alive, Inclusive and Respectful – describe how we intend to get there. We champion gender balance. The Group also works to anticipate, adapt and deliver solutions that enrich the lives of the communities we serve.

The Company's Code of Conduct underpins everything we do. Our modern slavery policy statement is contained within the Code of Conduct and published as a standalone document on www.airtel.africa: it states that the Company conducts its business in a way which respects human rights. The Company denounces holding another person in slavery, child labour, forced labour, inhumane treatment or working conditions that are a threat to life or hinders physical, emotional and mental wellbeing of a person.

The Code of Conduct has been adopted by all companies within Airtel Africa plc, such that it applies to all the Group's workforce (whether permanent or temporary as well as Board members). All employees and directors within the Group should, therefore, make the Code of Conduct an integral part of their day-to-day duties.⁵

The Code of Conduct sets out ethical practices expected from employees, including policy provisions regarding modern slavery. On an annual basis, all Group employees complete mandatory training on the Code of Conduct. For the financial year 2023/24 we recorded a completion rate of approximately 99.5%, whereby Airtel Africa employees have completed the Code of Conduct training and certification exercise, which covers our commitments on diversity, inclusion and non-discrimination. The Code of Conduct requires all of us to act ethically and to always comply with legal requirements, putting our principles into practice in everything we do. Everyone who works for Airtel Africa is required to report suspected breaches of the Code of Conduct, including via the Airtel Africa anonymous and confidential whistleblowing/hotline reporting service. These online and phone reporting hotlines are available in official languages, and every report is assessed and investigated. Further details of our whistleblowing policy can be found in our Annual Report and Accounts 2024 and on www.airtel.africa

As outlined in the Code of Conduct, we demand the same high standards from our business partners and evaluate whether a prospective partner's values align with our own before making contractor and supplier decisions. We have a zero-tolerance approach towards modern slavery, human trafficking, forced labour and child labour. This is also outlined in our Code of Business Ethics for partners and suppliers which is published on www.airtel.africa⁶

3. DUE DILIGENCE AND RISK ASSESSMENT

Due to the nature of our business, we consider that the business of the Company carries a low risk of modern slavery occurring in our supply chain. In our Sustainability Report 2024, we published the results of the double materiality assessment which was conducted earlier in the year. Our supply chain

⁵ Generally extracted from the Code of Conduct

⁶ See ethical business conduct on www.airtel.africa

was identified as one of the high impact material topics so we'll continue to develop dedicated programmes to increase supplier disclosures and monitor their environmental, social and governance (ESG) performance with a particular focus on the top 100 suppliers and any new suppliers who may operate in or be exposed to locations, industries or activities with a history of poor labour standards.

During the reporting period ended 31 March 2024, we continued to integrate human rights due diligence into our supplier assessment as outlined in Airtel Africa's Annual Report and Accounts 2024. As part of our sustainability strategy, we carried out, for the second year, our annual ESG due diligence assessment of 100 top vendors and suppliers, which account for over 87% of overall procurement activities: our suppliers were required to complete the survey and include an evaluation of their respective policies and protocols which explicitly prohibit any form of child labour, human trafficking, forced labour and modern slavery. Additionally, each year we require that vendors certify to us their compliance with our Code of Conduct in which they undertake that they have not and do not engage in any form of modern slavery, including child labour or forced labour in our supply chain.

During the registration process of new suppliers, the Group also conducts screening for new partners against databases for sanctions, anti-bribery and corruption, politically exposed persons and adverse media reports, including reports of possible modern slavery violations. The Group has contracted the services of a third-party provider for the screening database ensuring the information is constantly being updated.

If the effectiveness of our measures is called into question, or our periodic reviews of our compliance indicate any areas for improvement, we will make such changes to our policies, practices and procedures as may be required from time to time.

We review the Code of Conduct certifications, ensuring partners follow our standards, assess and change the supplier onboarding processes as well as review and amend contractual terms as necessary.

We conduct a further assessment of the Group's exposure to potential wrongdoings across our operating business and supply chain. This analysis is informed by:

- the risk profile of individual countries based on the Global Slavery Index (GSI)
- the extent to which specific demographic groups or types of employees or contractors may be more vulnerable than others for cultural, economic or operational reasons
- the disclosures of peer companies and vendors, and
- the insights of labour and human rights groups and other stakeholders with specialist expertise in this area.

This analysis, in turn, determines the required programmes and associated compliance mechanisms.

4. EVALUATING OUR PROGRESS

During 2023/24:

- We conducted an ESG self-assessment questionnaire (SAQ) amongst 100 of our top suppliers by spend and received a 62% completion rate. Several survey questions focused on human rights protection. The results revealed that 95% of respondents had a written policy or statement in place that explicitly prohibited child labour, human trafficking, forced labour and modern slavery.⁷
- Our internal audit and assurance team assesses compliance with all internal policies and regulatory obligations and is carried out in partnership with auditors from Ernst & Young's

⁷ Sustainability Report 2024, page 21

internal audit services.⁸ During the 12 months ended 31 March 2024, the internal audit and assurance team conducted 34 onsite audits.

- Additionally, we are a member of the Joint Audit Cooperation (JAC), which represents telecommunications service providers with shared vendors to the ICT industry. JAC oversees onsite audits of five of our suppliers annually to assess ESG standards of the suppliers and monitor compliance with ESG best practice.
- During the reporting period, we investigated 67 incidents received through various touchpoints and our formal whistleblowing channels, none of which concerned violations of human rights. These incidents were of varying magnitude, with 11 meeting the threshold for reporting to the Audit and Risk Committee. The Audit and Risk Committee reviews and approves the mitigating actions. The very small number of reports that contained allegations of a breach of our Code of Conduct were thoroughly investigated and disciplinary action was taken where appropriate. Most reports received during the period were human resource issues that indicated no compliance concerns or serious breaches of our Code of Conduct.

5. TRAINING AND CAPACITY BUILDING

The annual all-employee mandatory compliance training programme for the Code of Conduct includes modules on modern slavery risks and identifies 'red flags'. We plan to further enhance these modules to ensure our people are aware of the different types of human rights abuses and to help identify higher risk suppliers for Airtel Africa, including industry sector risks, key warning signs, 'red flags' and supplier onboarding protocols. We will focus on senior purchasing employees to raise awareness of the issues and provide them with information to assist in identifying the warning signs of slavery and human trafficking, including instructions on how to escalate concerns.

Training is also provided via face to-face line manager events, webinars and induction programmes for new employees.

6. REPORTING CONCERNS

We continue to encourage our workforce to remain vigilant to potential modern slavery and human trafficking abuses and to escalate any concerns they may have with respect to these issues. Employees can report their concerns to management or through the independent whistleblowing hotline, where reports are reviewed and investigated independently. We will continue to seek improvements in our knowledge and remain vigilant to potential areas of heightened risk and investigate concerns raised. Where issues are highlighted through business channels, these are required to be escalated to senior management for review and resolution. As with all incident reporting, individuals who raise concerns on modern slavery in good faith can do so without fear of retaliation.

7. NEXT STEPS

As part of our sustainability strategy, we are undertaking a review of our standard supplier contracting terms, with the updates fully implemented by 31 March 2026. This improvement will enable the Company to respond appropriately, should modern slavery concerns be identified in the supply chain.

⁸ Airtel Africa plc Annual Report and Accounts 2024, page 135



8. UK ENTITIES

This statement and the actions taken apply to Airtel Africa plc and its subsidiaries, the specific UK entities that meet the reporting threshold are noted below:

- Airtel Africa plc
- Airtel Africa Services (UK) Limited

BOARD APPROVAL

This statement was approved by the Board of directors of **Airtel Africa plc** on 24 July 2024.

Signed on behalf of the Board of directors of **Airtel Africa plc** by Sunil Taldar, chief executive officer, on 24 July 2024.

A handwritten signature in black ink, appearing to read 'Sunil Taldar', is written over a faint, illegible background.

Sunil Taldar

Chief executive officer and Board director

24 July 2024