



Child labour and young workers **GROUP POLICY**

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I. INTRODUCTION

The purpose of this document is to clearly set out the rules on age limit for employees and work performed by young workers to ensure adherence to local law and relevant international standards on child protection. In addition, the policy provides guidance on the processes to control compliance and how to resolve any issues identified.

The policy is primarily aimed to support the work of Human Resource teams, line managers and anyone involved in engaging external workforce to exclusively work with Millicom Group companies.

II. POLICY COMMITMENT

Millicom and its Group companies will not directly hire workers under the age of 18 years old. The only exceptions to this policy are specific trainee programs for young workers that take into account the local legal restrictions applicable to persons under the age of 18. For any young workers above the age of 15 who have not completed compulsory schooling Millicom will ensure that their jobs will not interfere with the completion of their education.

The age limit of 18 will also apply to any persons hired indirectly to sell exclusively Millicom's (and its subsidiaries') products and services (so called freelancers), drivers, and any staff hired to work on network deployment, technical installations and physical maintenance of telecommunications or cable networks.

For all other indirect employment, age limit is defined in detail in the Millicom Supplier Code of Conduct.

III. CONTROL MEASURES AND AGE VERIFICATION

Each Millicom Group subsidiary will define identification documents (ID) that by local laws, regulations or practice, are accepted as 'proof of age'. If documents are not trust-worthy or the worker does not possess an approved form of ID, Millicom will apply and document an age verification process.

Copies of the ID papers, the ID numbers, or documented age verification are kept on file together with the worker's contract by the HR Department or any other relevant department.

Audit of these controls will be included in internal controls performed on the Human Resources, Sales and Procurement functions.

Age verification

When there are no acceptable 'proof of age' documents available to verify age of an applicant and they are unsure of their age or appear under 18, or where there is a strong reason to believe that presented ID documents are falsified, the hiring organisation will apply one or several of the suggested methods to determine the applicants age:

- A medical examination. Care should always be taken to respect the person's right to privacy.
- Statement from village elders, or other local authority.
- Cross-checking multiple written documents and affidavits to verify the validity of the provided documentation.
- Interviews with employees and applicants to obtain further information; e.g. discuss their birth and relate to any major historical events in the country (independence, start or end of war, heads of State in power, etc.)
- Request any school enrolment certificates.

The verification method used should be documented and filed with the worker's contract by the HR or other relevant department.

IV. REMEDIATION

In case violations to this policy are found, the following steps must be followed:

In case the worker is under 15 years of age or under the legal minimum age for employment, the labour agreement will be terminated as soon as possible as per local labour law. The company will:

- Investigate the child's overall situation, and in a particularly serious financial situation strive to recruit another adult family member of the child.
- Ensure that the child continues to attend mandatory schooling, and commits itself – or requires a supplier – to compensate all necessary expenses for school attendance (fees, books, other expenses).
- Seek to engage a governmental or non-governmental organisation to support to monitor that the child completes their education.

In case of young workers, the company will immediately terminate any involvement in hazardous work. The company will:

- Determine whether the young worker is able to continue employment within a structure of traineeship or other framework where the working hours and other legal restrictions can be fully controlled.
- Investigate the young worker's overall situation and, in a particularly serious financial situation, consider a reasonable level of compensation to the young worker or their family for any lost income.
- Consider employing the young worker once they have reached the minimum age as described in this policy.

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