



emtelco
CX & BPO

Supplier Code of Conduct

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Free number: 018000517871
 e-mail: linea-etica@emtelco.com.co

1. Guiding principles

EMTELCO (as defined below) firmly believes that responsible business practices lead to sustainable business success. EMTELCO is committed to operating responsibly and extends this responsibility to its Suppliers.

The purpose of this Code is to set out the basic requirements and standards of performance that all of our Suppliers must meet in order to do business with EMTELCO. Suppliers must fulfill the highest standards of honesty, fairness, and ethics in the areas of health and safety, environmental, fair labor, human rights, and compliance.

2. Compliance with laws

Suppliers shall fully comply with all applicable laws, rules, and regulations as a condition of doing business with EMTELCO. In the event of any differences between applicable laws and this Code, Supplier must follow the more restrictive mandate. Regardless of whether no legislation on health and safety, fair labor, human rights, compliance, and environment exists in the territory or if existing laws are not enforced, Suppliers shall always follow responsible business practices which meet the highest international standards and industry best practices.

Subcontractors

In the event a Supplier requires a Subcontractor to fulfill part or all of its obligations under any agreement, purchase order, or other contractual relationship between Supplier and EMTELCO, Supplier shall:

- obtain prior written approval from EMTELCO before engaging any Subcontractor;
- provide the Code to its Subcontractor and require Subcontractors to comply with the Code; and
- provide any documentation requested by EMTELCO to confirm the Subcontractor's knowledge of and compliance with this Code.

3. Scope

The Supplier Code of Conduct applies to all suppliers having a contractual relationship with the company.

Suppliers must appropriate and comply with the provisions of this Supplier Code of Conduct.

4. Definitions

4.1 **Emtelco**, refers to the following company, : Emtelco S.A.S.

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4.2 Suppliers, They are defined as supplier(s), contractor(s), distributor(s), consultant(s) and other third parties providing goods, services to support EMTELCO's operations.

4.3 Interest Groups: They are the set of stakeholders and/or third parties impacted by the activity of an organization. Interest groups may be groups or individuals representing things, persons or interests that affect or are directly or indirectly affected by the performance of an organization's activity. In our case, shareholders, investors, collaborators, customers, users, suppliers, society and the government are considered interest groups.

4.4 Business ethics: business ethics is acting under the principles, values, norms and organizational guidelines that lead to good personal and social behavior within our companies. Working with ethics, relationships are created based on trust, transparency and tranquility, both within the organization and with interest groups and thus we all contribute to the economic, social and environmental sustainability of the company.

4.5 Business Partners: are third parties with which the company has a business agreement, such as a joint partnership, allies, local partnership or other joint business activity in which the business partner may interact with government officials on behalf of the company, either directly or indirectly.

5. Business Ethics and Responsible Business Practices

Suppliers must be committed to the highest standards of ethical conduct and responsible business practices. The promotion of business ethics and anti-corruption are fundamental to doing business the right way and are also key elements of sustainable and long-term business development.

5.1 Bribery and Corruption

EMTELCO has zero tolerance for any form of corruption, bribery, extortion and/or embezzlement, and EMTELCO will not do business with any Supplier that engages in such activities. Suppliers shall have an anti-corruption policy or equivalent that prohibits any form of bribery and/or corruption within their organization and with any third party, including facilitation payments.

Suppliers shall at all times comply with the obligations set out in this Code and with any anti-bribery and corruption obligations included in any contract entered into with EMTELCO. EMTELCO may conduct thorough screenings of new and existing Suppliers, as well as of any potential Subcontractors, at EMTELCO's sole discretion.

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5.2 Money Laundering

Suppliers shall comply with all applicable anti-money laundering laws and regulations and shall ensure that Supplier and its Subcontractors do not participate in or facilitate money-laundering activities.

5.3 Gifts and Hospitality

EMTELCO prohibits promising, giving, requesting, or accepting gifts other than promotional or branded items of nominal value. Suppliers i) shall not provide gifts in relation to their business dealings with customers and government officials; and ii) shall not provide any hospitality to government officials, or to private persons with the intent to improperly influence them or where the hospitality could be perceived to improperly influence or create an obligation.

5.4 Conflict of interests

Suppliers must disclose actual or potential conflicts of interest to avoid any type of risk to Supplier's business relationship with EMTELCO.

6. Confidential Information and Data Protection

Suppliers may receive, encounter, or access confidential information, which is of a proprietary nature to EMTELCO. Supplier shall safeguard and protect all EMTELCO information that can reasonably be considered to be of a confidential nature and shall not use any confidential information other than for those business purposes for which it was provided to Supplier. Any supply agreement, contract, or purchase order that exists between EMTELCO and Supplier is considered confidential information.

Supplier must comply with all applicable data protection laws.

Suppliers will refrain from issuing any press releases or other public disclosures related to any of its business relationships with EMTELCO, without EMTELCO's prior written approval.

7. Intellectual Property

Suppliers must comply with all the applicable laws governing intellectual property rights, including protection against infringement of copyrights and trademarks.

Suppliers must ensure that all marketing and advertising activities conducted on behalf of EMTELCO comply with all applicable laws and with EMTELCO's trademark guidelines.

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8. Fair Labor, Human Rights, and Protections

Suppliers shall not knowingly cause, contribute, or become complicit in the violation of human rights. Suppliers shall adopt policies and responsible business practices which are consistent with the “Universal Declaration of Human Rights,” the “UN Guiding Principles on Business and Human Rights,” and the “International Labour Organization Fundamental Conventions.”

8.1 Involuntary or Forced Labor

EMTELCO prohibits the use of forced labor. Suppliers shall not engage in any form of compulsory or forced labor, debt bondage, slavery, human trafficking, or involuntary prison labor, and shall not place any unreasonable restrictions on workers’ freedom of movement in any of Supplier’s working facilities. Supplier’s employees and sub-contractors must be free to leave work or terminate their employment after providing reasonable notice. Supplier shall not deprive its employees and sub-contractors of their identity documents or work permits, and their employment shall at all times be voluntary.

8.2 Prohibition of Child Labor

EMTELCO believes education for all children is essential to long term development. EMTELCO is strictly against the use of child labor and prohibits its use in its operations, distribution network, and the manufacturing or execution of the products and services it purchases. Suppliers shall prohibit child labor, ensure children are not employed by their suppliers, and follow other relevant ILO and UNICEF recommendations with regards to children’s rights.

Supplier shall not employ any worker under the age of 18, for which they must have rigorous age verification procedures for each worker in accordance with the current labour regulations.

In addition to local regulations, the restrictions in this section will apply to any person indirectly hired, such as independent workers and/or independent contractors, for the purpose of selling and/or providing EMTELCO’s products and services.

8.3 Employment Practices

Suppliers must treat all employees with respect and dignity, and ensure employees are not subjected to threatening behavior, or any kind of inhumane treatment, including but not limited to corporal punishment, physical, verbal, or sexual abuse, or any other form of harassment, abuse, or intimidation.

8.4 Working hours

Suppliers shall adhere to both local and international laws regarding daily and weekly working hours, including laws concerning break-time and maximum overtime. Suppliers shall provide paid leave and holidays as required by law or that meet the local industry standard, whichever is greater. Suppliers shall also allow employees at least one day

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off during any seven-day period or comply with the local legal standard if more stringent. A “day” is considered a minimum of twenty-four (24) hours of continuous rest.

8.5 Wages

Supplier’s shall pay its employees fair wages aligned with local regulations for all hours worked. Supplier shall clearly communicate those wages in advance of the employee commencing work. Suppliers shall inform employees if overtime is required and the wages to be paid for such overtime.

8.6 Equal Opportunity Employment and Discrimination

EMTELCO promotes and practices respect for a diverse and inclusive workforce, maintains a positive work environment, and discourages discrimination in the workplace. EMTELCO engages and supports the hiring of under-represented groups (such as women, minorities, disabled persons, and LGTBQ+ persons) and encourages its Suppliers to do the same. Suppliers shall not engage in or support any form of discrimination in hiring, employment terms, remuneration, promotion, termination, retirement procedures, decisions, or professional development based on (but not limited to): race, color, age, veteran status, gender identification, sexual orientation, pregnancy, ethnicity, disability, religion, political affiliation, trade union membership, nationality, indigenous status, medical condition, HIV or other health status, social origin, and social or marital status.

8.7 Freedom of Association

Suppliers shall respect the right of employees to freely create, join, or refrain from joining a labor union of their choice without suffering any form of discrimination, intimidation, or harassment, in accordance with local law and international standards.

8.8 Foreign or Migrant Workers

Suppliers shall ensure that migrant workers are not subject to any form of forced, compulsory, bonded, or indentured labor. Suppliers shall ensure that all work is voluntary and that workers are free to terminate their employment at any time, without penalty. Suppliers shall ensure that migrant workers and their families are not threatened with denunciation to authorities to coerce them into taking up employment or to prevent them from voluntarily terminating their employment, at any time, without penalty.

9. Protection from Occupational Hazards

Suppliers shall ensure they comply with all applicable local and international health, safety, and environmental legislative requirements for their specific work activities, services, and supplies. Suppliers shall reasonably identify, implement controls, and mitigate all foreseeable hazards and risks. Such controls shall include, without limitation, the provision of protective equipment and clothing and training regarding the hazardous task(s) and working environment.

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9.1 Emergency Preparedness

Suppliers must have suitable and sufficient processes and procedures that protect its workers from identified emergency risks (i.e. fire, flooding, hurricane, earthquakes, etc.) and must adopt appropriate emergency plans, security equipment, working fire alarms, and evacuation procedures.

9.2 Occupational Injuries and Illnesses

Suppliers are required to maintain accurate records of any occupational health and safety injuries or illnesses of its workers. Workers should be encouraged to report injuries and illnesses in order to prevent similar accidents in the future. Recording details shall also provide if are required, for trend analysis and evidence to support such workplace accidents.

10. Environmental Protection

10.1 Normatividad aplicable

Suppliers should strive to minimize any adverse environmental impacts caused by their products and services throughout their life cycle: production, transportation, distribution, use and final disposition. Suppliers shall comply with all relevant legislation. Suppliers must take the following measures, which in turn are incorporated into Colombian environmental legislation:

- **Permits and reports:** Where required by law, obtain environmental permits and/or licenses and comply with legislation relevant to their activity, in relation to the manufacture, transport and disposal of waste, as well as associated with atmospheric emissions (noise, gases or polluting material from stationary or mobile sources, refrigerant gases, electromagnetic fields).
- **Reduction and treatment of waste:** Establish measures to minimize the generation of waste resulting from their production activities. In the same way, it raises awareness among its employees to reduce the generation of waste and classify them according to current regulations in order to manage them properly through recycling and other methods of waste reduction. Suppliers shall also adequately reduce, treat and control liquid waste and waste water discharged.
- **Hazardous materials:** Identify any chemical and other hazardous materials used by Providers that may cause harm to humans and the environment and that may be used for the production or provision of services and where necessary inform local authorities. Similarly, ensure that all gases, substances and materials are stored, transported and used appropriately to minimize any harm or risk to humans and the environment. Similarly, any waste resulting from the use of these materials must be carried out in accordance with the current regulations relating to hazardous waste.

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- International suppliers must validate the applicability and compliance with RoHS regulations, REACH and any other relevant applicable regulations that seek to ban or minimize hazardous substances.
- **Product Labelling:** Suppliers must comply with all labelling requirements that indicate local and international laws and regulations regarding the potential environmental impact, including, but not limited to, the packaging, disposal of electrical and electronic equipment and the prohibition and restriction of potentially dangerous or harmful substances.
- **Energy efficiency:** Suppliers manufacturing electrical and electronic equipment and those providing services associated with the supply, maintenance and operation of equipment should develop products and services through processes that offer:
 - low energy consumption and environmental impact during manufacture, delivery and installation;
 - low energy consumption during the operation;
 - increased resistance to high temperatures (thus reducing the need for cooling);
 - a lower content of hazardous components;
 - a design that facilitates reuse and/or recycling before disposal.
- **Biodiversity:** The provider who, within its scope, has to carry out tasks associated with the management of flora and fauna associated with telecommunications networks or administrative sites, must comply with the regulations in force in this area and manage the corresponding permits. In the same way, it must be preventive in order to protect species and minimize their impact.
- **Landscape and visual impact:** The supplier who has tasks associated with the assembly of telecommunication structures and air networks must comply with the local regulations in force on the subject and the measures to be implemented to reduce the visual impact.
- Any equipment provided by Suppliers emitting electromagnetic fields (EMF) should be manufactured, tested and compliant with global safety standards as defined by International Commission on Non-Ionizing Radiation Protection (ICNIRP), and for mobile handsets within the SAR safety limits.
- Suppliers who manufacture components, and/or products containing conflict minerals such as tantalum, tungsten, tin, and gold shall maintain policies and procedures to reasonably ensure that the raw minerals originate only from smelters and mines designated as “conflict free”. Suppliers shall provide EMTELCO any supporting documentation necessary to confirm compliance with this requirement upon request.

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10.2 Community Engagement

EMTELCO encourages Suppliers to engage in supporting the communities where they operate to promote social and economic development.

10.3 Monitoring

EMTELCO may take all necessary measures to monitor Suppliers' adherence to this Code. Failure to comply with the terms of the Code may result in disqualification or termination of Supplier.

10.4 Records, and Right to Audit

Supplier shall maintain full and accurate records relating to its compliance with this Code. EMTELCO may, at its sole discretion, audit such records upon reasonable notice to Supplier.

10.5 Commitment and Transparency

In its annual report, EMTELCO may report information related to the compliance of its Providers with this Code. EMTELCO shall not identify the Provider by name in any report without the prior consent of the Provider.

11. Speak Up

Suppliers shall report any cases of unlawful or unethical conduct or violations of this Code. Reports to the Ethics and Compliance area can be made anonymously through the Ethics Line

Reports and complaints may be submitted through channels arranged by EMTELCO:

- ✓ E-mail: linea-etica@emtelco.com.co
- ✓ Free line: 018000517871
- ✓ Website:
 - <http://www.emtelco.com.co/contacto>
 - Intranet regulations/Ethics and Compliance

In order to ensure responsible actions both within the organization and with external stakeholders, on our website: <http://www.emtelco.com.co/nosotros#normatividad> where you will find topics related to corporate management practices such as ethics, anti-corruption, Anti-bribery, transparency, conflicts of interest and in general practices that, in line with the institutional values, they allow us to contribute to the sustainability of our Company, generate relationships of trust with our stakeholders and protect us from situations that may affect us reputational or legal.

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Those who report ethical or legal issues or breaches of this Code to Millicom or Supplier will be protected against retaliation for any good faith reporting of wrongdoing.

12. Update and Communication

This code will be reviewed annually by the Ethics Committee and any changes will be communicated to all employees as well as interest groups through the publication of the same on the website or any other means of communication determined.

13. Validity

Change control									
Version	Nature of change	Elaborated		Revised		Approved		Validity	
		Name	Position	Name	Position	Name	Position		
1	Initial release	Luis Fernando González Rojas	Professional Corporate Social Responsibility	Juan Ignacio Palacio	General Manager (E)	Juan Ignacio Palacio	General Manager (E)	14/12/2015	06/11/2017
2	The concept of transnational bribery is included	Luis Fernando González Rojas	Professional Corporate Social Responsibility	Maritza Garzón Vargas	General Manager	Audit Committee	Audit Committee	07/11/2017	22/07/2019
3	Content adjustments in accordance with Millicom guidelines	Luis Fernando González Rojas	Professional Corporate Social Responsibility	Maritza Garzón Vargas	Gerente General	Ethics Committee	Ethics Committee	23/07/2019	30/06/2020
4	Content adjustments in accordance with Millicom's guidelines. - Version 4	Millicom	Millicom	Luis Fernando González Rojas	Profesional RSE	Millicom	Millicom	01/07/2020	A la fecha

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14. Adherence to the code

Compliance of the Supplier Code of Conduct

This Supplier Code of Conduct has been read and understood by the supplier, who commits to fulfilling the practices described herein. As a sign of his or her agreement, the Code is undersigned by the Supplier's Legal Representative

Name: _____

Company: _____

Signature:

To certify that you have received, read and understood the Supplier Code of Conduct, and to manifest that you commit to fulfilling with its terms and conditions



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