

## **1. Policy Statement**

Safaricom Plc is committed to the highest standards of openness, probity and accountability. It is a fundamental policy of the company that all its employees and business partners observe and comply with the Laws and regulations applicable to its business and that they act with high standards of business integrity.

In the interest of the company, Safaricom expects employees and business associates to disclose information in respect of workplace related criminal or other irregular behaviour. This policy is intended to encourage and enable persons to raise serious concerns of wrongdoing in good faith and without fear of reprisal.

Safaricom also encourages the general public to report any incidents of unethical behaviour or concerns via the ethics hotline. These reports play a key role in curbing unethical action.

## **2. Purpose**

The principal emphasis and purpose of this policy is to ensure all employees, suppliers, dealers, agents and all business associates of Safaricom are aware of their obligation to report any suspected incidents of dishonesty, financial malpractice, illegal activity or breaches of Safaricom Business Principles or policies. This will enable the company to initiate corrective action where deemed necessary and appropriate.

## **3. Policy Application**

This policy applies to the following:

- All staff of Safaricom Plc i.e. permanent staff, casual staff, temporary staff, trainees, interns, contractors and secondees.
- All dealers and agents
- All suppliers and business partners

## **4. Scope of Policy**

This policy is intended to cover concerns which are in the interest of Safaricom Plc. These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of the above

## **5. Policy Principles**

### **5.1 Responsibility to report**

This policy places an obligation on employees, suppliers, dealers, agents and any other business associates to report any suspected incidents of dishonesty, financial malpractice, illegal activity or breaches of Safaricom Business Principles or policies.

Disciplinary action may be taken on any employee who fails to report any of the offenses highlighted in this report that he/ she is aware of or has reasonable suspicion/ belief of their commission.

Action may also be taken by the company on any suppliers, dealers, agents and other business associates who are aware of any of the reportable offenses highlighted above but deliberately fail to report.

Although the same responsibility is not placed on the general public, Safaricom encourages any member of the public to report unethical activity involving Safaricom staff and its associates.

## **5.2 Protection**

This policy is designed to offer protection to whistleblowers who report such concerns provided the report is made:

- In good faith
- In the reasonable belief that it constitutes malpractice or impropriety.

The company will take all steps and measures possible to protect whistleblowers against any victimization.

## **5.3 Confidentiality**

Safaricom will treat all such reports in a confidential and sensitive manner. The identity of the individual making the report shall be kept confidential so long as it does not hinder or frustrate any investigation. However, should the need arise, the individual making the report may be required to provide a written and signed statement should such a statement be required in evidence.

## **5.4 Untrue Allegations**

All reports should be made in good faith. In making a report, the person making the report should exercise due care to ensure the accuracy of the information given.

## **6. Procedures for Making a Report**

### **Anonymous and confidential reporting**

Safaricom has engaged an independent 3<sup>rd</sup> party to manage the Ethics Hotline. The facility allows whistleblowers to report any irregularities anonymously and in confidence. All such reports are thoroughly vetted and validated for credibility and reasonable truthfulness before investigations are commenced.

The ethics hotline can be reached:

- By telephone through the toll-free Fraud Hotline 0800720009
- By e-mail to [safaricom@ethics-line.com](mailto:safaricom@ethics-line.com)
- [www.safaricomethicsline.com](http://www.safaricomethicsline.com)

### **Reporting structure**

The independent 3<sup>rd</sup> party will send the whistleblowing reports to Safaricom as follows:

1. All reports and statistics to the Chief Corporate Security Officer and HOD Ethics and Compliance, except;
2. If any of the recipients in 1 are mentioned in the report then the reports will be sent to the Chief Executive Officer; and

3. If the Chief Executive Officer is mentioned the report will be sent to the Chairman of the Board Audit Committee.

### **Open reporting**

Employees, suppliers, dealers, agents and other business associates may also make a report to any of the following:

- Chief Executive Officer
- Chief Corporate Security Officer
- Any Chief/ Director
- HOD Ethics and Compliance by email to [reportfraud@safaricom.co.ke](mailto:reportfraud@safaricom.co.ke)
- Any member of the Ethics and Compliance team

Any report made should provide sufficient, precise, and relevant information pertaining to the incident, for example, date when alleged offence occurred, place where alleged offence took place, persons involved etc. to facilitate the commencement of an investigation. If the person making the report wishes to discuss the report in detail, he/she should indicate this in the submission or message and include a telephone number at which he/she may be contacted.

### **7. Investigation**

Investigations will be carried out pursuant to the provisions of the Fraud Policy and the Fraud Assignments Policy.

### **8. Effective date:** April 2013

This policy is in operation until revoked or modified.