

Safaricom PLC is committed to the highest standards of conduct and business ethics. It is the company's fundamental policy that all its Board members, 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.

Through the policy, we



Confirm our dedication to the principles of ethical and lawful business conduct



Provide clear guidelines regarding management of bribery and corruption



Enlighten our Board members, employees and business partners on how to recognize and deal with situations that may give rise to or be perceived to be bribery and corruption.



Document the process of addressing potential, actual or perceived bribery and outline the key responsibilities regarding corruption and bribery management

Responsibilities

- ✓ **Ethics Committee:** Approval of the policy and mitigation of bribery risks.
- ✓ **Chief Executive Officer:** Overall responsibility for compliance with legislation and policies governing the prevention and detection of corruption and bribery.
- ✓ **Chief Corporate Security Officer:** Development and delivery of the Anti-Corruption and Bribery strategy and compliance requirements.
- ✓ **Head of Ethics and Compliance:** Day to day completion of Anti-Corruption and Bribery activities.
- ✓ **Executive Team:** Employees' compliance to the policy.
- ✓ **Employees, contractors, and other stakeholders:** Full compliance with the policy.

Eradicating corruption and bribery requires us to:

- ✓ Always act with honesty, integrity and transparency.
- ✓ Comply with the spirit, as well as the letter, of the applicable laws and regulations.
- ✓ Conduct all our business relationships in an ethical and lawful manner.
- ✓ Develop, implement and review our processes to continually improve systems through remedial and preventative steps.

Reporting

- ✓ Our employees, Safaricom subsidiaries and business partners have a **duty to report** all incidents of corruption and bribery affecting public officials, private entities or both under the law and this policy to the police and the Chief Corporate Security Officer (CCSO)



- ✓ **Ethics Hotline (Anonymous reporting line): Website:**

www.safaricomethicsline.com; Email: safaricom@ethics-line.com Toll free: 0800 720 009

- ✓ **Ethics Helpdesk:** Integrity@Safaricom.co.ke

The list of unacceptable behavior is non-exhaustive and applicable to our Safaricom employees. We encourage our Board members, employees and business partners to always act with the highest degree of business integrity and seek guidance when unsure of how to act.



Receiving / Soliciting for bribes

Our employees shall not receive or solicit a bribe from a Business Partner for the purpose of:

- ✓ Influencing their act or decision.
- ✓ Inducing omission or violation of lawful duty.
- ✓ Securing any improper advantage for either parties.
- ✓ Inducing an employee to influence decisions of another employee for financial gain.
- ✓ Issuing confidential information or advice.
- ✓ Manipulation of the procurement process.
- ✓ Deceiving/ making false or misleading statements to Safaricom.
- ✓ Committing any other corrupt payment defined in any Safaricom policy/ procedure



Donations/ Sponsorships

We exercise care when making corporate donations not to be seen as bribes. All our corporate donations are made through Safaricom Foundation, and in line with the Foundation guidelines.



Bribing Government officials

Our employees shall not make or promise any payment directly or indirectly to a Government official for the purpose of:

- ✓ Influencing any act/ decision of the official.
- ✓ Inducing omission or violation of lawful duty.
- ✓ Securing improper advantage.
- ✓ Inducing the official to influence the Government decision for any financial gain.
- ✓ Receiving confidential information to provide undue advantage.
- ✓ Manipulation of the procurement process.
- ✓ Committing any other corrupt payment defined in any Safaricom policy/ procedure



Gifts and hospitality

Offering of corporate gifts and hospitality, by our employees is always guided by the **Gifts Policy**.



Indirect payments

We do not make payments where the ultimate recipient is known to be a covered party for a corrupt purpose.



Bribing private sector agents

Our employees shall not make or promise any payment directly or indirectly to a private sector agent for the purpose of:

- ✓ Influencing any act/ decision of the official.
- ✓ Inducing omission or violation of lawful duty.
- ✓ Securing improper advantage.
- ✓ Inducing the official to influence the Government decision for any financial gain.
- ✓ Receiving confidential information to provide undue advantage.
- ✓ Manipulation of the procurement process.
- ✓ Committing any other corrupt payment defined in any Safaricom policy/ procedure



Payment to business partners

All our business relationships are governed by written contracts/ duly approved purchase orders before commencement of work.

We do not make payments to business partners without a valid written contract.