

Anti Bribery and Corruption (ABC) policy

1.0 Statement of Commitment

Mauritius Telecom and its subsidiaries (“MGT” or “ Company”) is committed to conducting its business in a responsible, ethical, and transparent manner. It strictly prohibits any form of bribery or corruption or gift or payment for facilitation in its operations, transactions, and relationships with third parties.

It is committed to preventing, detecting, and responding to any illegal or unethical behaviour related to bribery and corruption, and to upholding the highest standards of ethical business conduct. It expects its employees, agents, contractors, and suppliers to comply with this policy and with all applicable laws and regulations related to anti-bribery and corruption.

The Company is committed to continuous improvement in its efforts to prevent and combat bribery and corruption, and to ensuring that its policies and procedures are up-to-date and effective in reducing the risk of illegal or unethical behaviour.

If any employee or third party has concerns about potential bribery or corruption, the Company encourages them to report the matter in accordance with our reporting procedures under its [Whistle Blower Policy](#). All reports are taken seriously and will be investigated in a prompt and impartial manner.

2.0 Bribery, Corruption, Facilitation payment, gift

Bribery is the act of offering, giving, receiving, promising, authorising or soliciting *‘anything of value’* with the intention of influencing the recipient's actions, decisions, or judgment in a dishonest or illegal manner. Bribery is illegal and is considered a serious breach of ethics and trust. Recipient could be any customer, business partner, vendor or other third-party.

‘Anything of value’ is not only cash, and includes, but not limited to, cash equivalents like gifts, services, employment offers, loans, travel and entertainment, favourable contracts, or personal favours.

Corruption is the abuse of power or position for personal gain or advantage. Corruption can take many forms, including bribery, embezzlement, fraud, and nepotism, and have negative impacts on individuals, organizations, and society as a whole.

Facilitation Payment: A facilitation payment is a small payment made to an officer to expedite or secure the performance of a routine action that the officer is already obligated to perform. Unlike bribes, facilitation payments are made for the purpose of securing the performance of a routine, non-discretionary act, and not to influence the outcome of a decision.

Gift: A gift is a voluntary transfer of ownership or possession of something of value, made without expectation of return or compensation. Gifts can be given for many reasons, including to show appreciation, to build relationships, or as a token of goodwill. Gifts are generally not accepted as they may be perceived as an attempt to influence decision-making.

3.0 Actions and behaviours prohibited

All employees of MTG, all third parties, suppliers, contractors, or other business partners and their respective employees should comply with this ABC policy. The following actions are regarded as non-acceptable by the Company.

1. Offering, giving, or promising to give any undue advantage to any person with the intention of inducing them to perform their duties improperly
2. Receiving, soliciting, or accepting any undue advantage from any person in connection with the performance of their duties
3. Engaging in any other behaviour that could be considered corrupt or unethical, such as embezzlement, fraud, or nepotism
4. Engaging in facilitation payments or making any other payments that are intended to expedite or secure the performance of a routine action
5. Offering, giving, or promising gifts or hospitality or anything of value that could be perceived as an attempt to influence decision-making, or that is excessive or inappropriate
6. Suppliers, contractors, or other business partners not complying with 'Supplier Code of Conduct'
7. Providing false or misleading information in relation to anti-bribery and corruption compliance
8. Failing to report any suspected or actual violations of the anti-bribery and corruption policy
9. Retaliation against any employee who reports a suspected violation of the anti-bribery and corruption policy

4.0 Due Diligence

Conducting thorough background checks: MTG expects its suppliers, contractors, and agents to undergo background checks to assess their compliance with anti-bribery and corruption laws and regulations, as well as their reputation for ethical behaviour. The Company expects the following from its suppliers, contractors, sub-contractors and agents: -

Implementing anti-bribery and corruption policies and procedures: to have in place their own anti-bribery and corruption policies and procedures and to train their employees on these policies.

Monitoring compliance with anti-bribery and corruption laws and regulations: to regularly monitor their own compliance with anti-bribery and corruption laws and regulations, as well as to inform it of any suspected or actual violations.

Reporting any suspected or actual violations: to promptly report any suspected or actual violations of anti-bribery and corruption laws and regulations, and to cooperate with any investigation into such violations.

Maintaining accurate records: to maintain accurate records of all transactions and to provide these records to the company upon request.

Implementing internal controls: to implement internal controls to prevent and detect any suspected or actual violations of anti-bribery and corruption laws and regulations.

5.0 Reporting and Investigation

The reporting, essential information to be provided of any perceived or actual violations, wrongdoings, misconduct of any of the prohibited actions should be made to the Whistle-Blower Coordinator as indicated under our Whistle-Blower policy. The investigation will be made as described in the policy.

6.0 Compliance and Monitoring

Regular assessments: The Company/MTG may conduct regular assessments, such as an audit, to ensure that its ABC policy is being implemented and followed by employees, contractors, and suppliers.

Training and education: The Company/MTG may provide regular training and education programs to all employees, contractors, and suppliers to raise awareness about the ABC policy, the risks of bribery and corruption, and the importance of compliance.

Employee code of conduct: The Company/MTG has included the essence of the ABC policy as part of its employee code of conduct, making it clear that any violation of the ABC policy may result in disciplinary action.

Contractual obligations: The Company/MTG shall include provisions in its contracts with third parties, such as agents, contractors, and suppliers, requiring them to comply with the ABC policy and applicable anti-bribery and corruption laws and regulations.

Whistleblower protection: The Company/MTG has a whistleblower protection program in place, allowing employees and other stakeholders to report suspected bribery or corruption in a confidential manner, without fear of retaliation or punishment.

Continuous improvement: The Company/MTG will continuously review and improve its ABC policy and related procedures, to ensure that it remains effective in preventing bribery and corruption.

7.0 Consequences of violating ABC policy

Anyone violating the anti-bribery and corruption policy is likely to face any of the following:

Disciplinary action: MGT may take disciplinary action against its employees and expects contractors, or suppliers to do same with their employees who violate this ABC policy. This can include warnings, termination of employment or contract, or other forms of disciplinary action.

Legal consequences: Depending on the nature of the violation, employee(s) of MTG or supplier or any individual involved may face legal consequences for violating anti-bribery and corruption law and regulations. This can include fines, imprisonment, or both.

Reputation damage: A violation of the ABC policy harms the reputation of MTG, the contractors, or suppliers, and potentially results in loss of business, damage to brand, and a decline in public trust.

Loss of business: A violation of this ABC policy by any third party with which MTG contract or otherwise do business will lead to termination of any contractual arrangements.