



Supplier Code of Conduct

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1. Introduction

Mauritius Telecom Ltd and its subsidiaries (hereinafter referred to as “Mauritius Telecom Group”, “The Group”, “MTG”) believe in harnessing technology to empower people and businesses to create a more sustainable future.

We strive to set up a sustainable business environment by strictly adhering to internationally recognized environmental, social, and corporate governance standards (“ESG standards”). The Group firmly believes that its ability to operate in a manner that upholds ecological integrity, social well-being, and sound governance principles is essential to its long-term success.

The MTG is committed to understanding and minimising the social and environmental consequences of its business operations. This commitment extends to the procurement of products and services. The Group endeavours to collaborate with transparent, ethical as well as environmentally and socially responsible suppliers who support, embrace, and comply with the requirements and expectations set out in this MTG’s Supplier’s Code of Conduct (SCC).

2. Our Values

This SCC has been designed to best reflect our values which are:

- Trust & Integrity
- Professionalism
- Creativity & Innovation
- Agility
- Respect & Care

3. Application

The SCC applies to our contractors, retailers, and suppliers, as well as all others with whom we do business including their employees, subcontractors and other third parties. The MTG requires all suppliers to communicate this SCC to their employees, subcontractors and other relevant third parties, in a manner that is understood by all.

4. Expectation

The MTG requires suppliers to establish and maintain appropriate management systems, the scope of which are related to the content of this SCC. The MTG also expects suppliers to be proactive, as they review, monitor, and modify their management processes and business operations, to ensure alignment with the principles set forth in this SCC.

The MTG will work with suppliers to ensure we achieve an improved performance in each of the areas outlined in this document. All procurement decision making will favourably consider suppliers that have adopted these areas, or can demonstrate that they will work with us, to achieve the minimum standards set out herein. We further expect our suppliers to encourage and work with their suppliers and subcontractors to ensure they also strive to meet the principles of this SCC or equivalent set of principles.

5. About the Supplier Code of Conduct

The SCC covers many situations but unfortunately it cannot address all ethical conduct, instead the SCC represents a broad framework of ethical conduct that the MTG expects the suppliers to uphold. All suppliers must undergo our Supplier Assessment programme, which is relevant to their business activities and sign a pledge to demonstrate their commitment to complying with the SCC.

MT Group may update or amend the SCC from time to time as deemed necessary.

6. Compliance

Together with this SCC, the suppliers are expected to comply with all:

- Laws and regulations
- MTG Code of Conduct
- MTG Policies and procedures and
- Instructions given by the MTG from time to time.

The Supplier Code of Conduct shall be regarded as a contract document and as an integral part of any contract entered between the MTG and the supplier.

7. Corporate Governance

The critical areas detailed in this SCC are:

- Business Ethics
- Human Rights and Modern Slavery
- Workplace Health and Safety
- Environmental Management
- Supplier Management

For each of these areas, we have set forth minimum requirements for our suppliers.

8. Consequences of Non-Compliance

Compliance with the standards set forth in the SCC, as relevant to the type of goods and/or services supplied, are mandatory. The MTG takes all the practices and standards outlined in the SCC seriously and in case of observed deviation from our SCC, we intend to have an open dialogue with the Supplier and discuss effective corrective measures that the Supplier should implement as soon as possible. If repeated deviations are observed and/or for any failure to comply with the standards set forth herein will entitle the MTG to terminate its business relationship with the supplier.

9. Business Ethics

9.1 Fraud and Anti-Corruption

MTG suppliers must adhere to the highest standard of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including extortion, fraud, or bribery. We adopt a zero tolerance approach to bribery and corruption as described in our Anti- Bribery and Corruption Policy.

9.2 Anti-Competitive Practices

MTG's suppliers must comply with fair competition law. Acts of collusion, cartel, price fixing or other anti-competitive practises are strictly prohibited and if so, discovered will be grounds for the supplier to be debarred from further business engagements with the MTG.

9.3 Conflict of Interest

Situations that create a conflict of interest or the perception thereof must be avoided. Suppliers must disclose any actual or potential conflict of interest to the MTG. All sponsoring measures by suppliers must be in accordance laws and regulations.

9.4 Money Laundering

Suppliers shall take all measures to prevent money laundering within their sphere of influence.

9.5 Terrorism financing

The Supplier shall not be financing terrorism which involves the solicitation, collection, or provision of funds with the intention that they may be used to support terrorist acts or organization. Such funds may stem from both legal and illicit sources.

10. Human Rights

10.1 General

MTG suppliers must comply with all national laws, in line with international standards on environmental practices, labour and human rights, including UN Convention on the Rights of the Child and ILO Conventions regarding environmental practices as well as labour and human rights, including modern slavery in any form.

MTG prohibits the use of all forms of slavery, servitude, forced labour, trafficking in persons (including orphanage trafficking of children), forced marriage, child labour, debt bondage, and other slavery like practices (Modern Slavery) in our business operations and supply chains. The MTG is committed to operating in a manner consistent with national and international Modern Slavery laws. The MTG requires its suppliers to uphold equal opportunities, freedom of association and the effective right to collective bargaining for its employees. Suppliers must have an internal system to remunerate employees fairly and responsibly, and a grievance mechanism and process for employees, suppliers, and customers.

10.2 Labour Rights

MTG suppliers must prohibit any use of forced, bonded, indentured, or involuntary labour, and embrace employment practices consistent with ILO conventions pertaining to forced labour and Modern Slavery laws. All work, including overtime work, must comply with applicable laws and/or collective bargaining agreements with respect to working hours and must be voluntary. Workers must be free to leave upon reasonable notice. Suppliers must provide their employees adequate living conditions according to applicable laws, and suppliers should also not mandate that workers hand over government-issued identification, passports or work permits as a condition of employment.

10.3 Fair Wage

Every worker has a right to compensation for job performed commensurate with their job role, skills, and performance. Our suppliers must pay at least the minimum or prevailing wage, whichever is higher, to comply with the Workers' Rights Act or any such applicable law(s), including fringe benefits, as the case may be. If the compensation paid does not meet the workers' basic needs and provide discretionary income, our suppliers must take remedial actions to realise a satisfactory level of compensation.

10.4 Child Labour

Child labour is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be the minimum age for employment. MTG suppliers must not engage in any practice inconsistent with the rights set forth in the Modern Slavery laws, Convention on the Rights of the Child, the ILO Minimum Age Convention (C.1381973) or the Prohibition and Immediate Elimination of the Worst Forms of Child Labour Convention (C. 1821999).

10.5 Anti-Harassment and Abuse

The MTG expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses. The MTG requires its suppliers to create and maintain an environment that treats all employees with dignity and respect, and will not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. No harsh or inhumane treatment, coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

10.6 Anti-Discrimination

Suppliers' employment practices must not discriminate with respect to race, colour, sex, religion, political opinion, age, sexual orientation, or disability. Employment must be awarded on merit or the inherent requirements of the job.

10.7 Due Diligence and Risk Management

The MTG has measures throughout its procurement procedures, including in supplier contracts and invitations to tender, to ensure respect for human rights. Suppliers will not be contracted if they are reasonably suspected to have committed, or have committed, offences in relation to Modern Slavery and human trafficking, or if they are alleged to have breached or have breached, any Modern Slavery and anti-human trafficking laws.

To the extent that a supplier has any concerns with the requirements of this SCC or believes that they could potentially be in breach of any aspect, it is the supplier's obligation and responsibility to proactively inform the MTG of these risks or issues.

The MTG may conduct due diligence of its business and of its suppliers, to assess human rights and Modern Slavery risks. This includes auditing new and existing suppliers to ensure that they comply with our anti-Modern Slavery requirements. These audits are focused on the areas of highest risk to human rights and Modern Slavery.

10.8 Data Privacy

The MTG treats all data with strictest of confidence in compliance with the Data Protection Act 2017. We take the privacy and data security of our customers and staff very seriously and we require our suppliers to protect data and uphold our privacy requirements and obligations. Where applicable, suppliers must implement administrative, physical, and technical safeguards that are no less rigorous than accepted industry practices on cybersecurity. Data processing by suppliers as well as the use of data must be documented in a comprehensible manner and disclosed to MTG, if required. Any breaches must be reported immediately and transparently. MTG reserves the right to audit suppliers' safeguards. All suppliers shall be registered as Data Processors with the Data Protection Office and shall provide a copy of the registration certificate to MTG.

11. Health and Safety

The MTG's approach to Health, Safety and Security proactively supports the physical, emotional, and financial wellbeing of our staff to create a positive environment for our staff, customers, and the communities in which we operate. We value open communication and seek to establish relationships that are based on integrity and trust. We require our suppliers to develop and implement health and safety management practices in all aspects of their business to provide a healthy and safe working environment for its employees, minimising the causes of hazards inherent in the working environment.

12. Environmental Management

12.1 General

The MTG requires our suppliers to work with us to ensure the Group utilises best practice approaches in environmental management, which consider cost effective solutions, consider use of raw materials, and reduce waste. The MTG also expects suppliers to adopt effective environmental management practices.

12.2 Precautionary Principle

All MTG's suppliers must comply with existing legislation and regulations regarding the protection of the environment in the countries where they operate. Suppliers should adopt a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound lifecycle and circular economy practices.

12.3 Carbon Emissions

All efforts should be made by suppliers to reduce greenhouse gas outputs through energy performance and efficiency measures. Upon request (and where practicable) suppliers must provide reporting data on third party transportation and distribution of products, including between a company's tier 1 suppliers and its own operations, and between the point-of-sale and the end-consumer (including retail and storage).

12.4 Waste and Packaging

Suppliers must comply with international best practice in relation to hazardous wastes, persistent organic pollutants, and hazardous chemicals. Just like MTG seeks to reduce and minimise waste of all types and encourage and promote the recycling and re-use of materials, it expects its suppliers to use the minimum packaging that is consistent with safe, hygienic, and protective transport of goods. It is expected that suppliers will identify and use packaging that is recyclable and efficient.

13. Supplier Management

13.1 Performance Reporting

In keeping with best practice reporting standards and applicable regulatory requirements, reporting on environmental and social performance to key internal and external stakeholders in a transparent and honest manner is an expectation the MTG has of all its suppliers. Suppliers are encouraged to incorporate management of, and reporting on, the progress of their sustainability plans, diversity initiatives as well as workplace practices and policies as part of their normal business operations. These reports must be provided to the MTG if available, and upon request.

13.2 Record Keeping

Accuracy in the reporting of financial results is important to MTG, and all corporate records must be true, accurate, complete, and timely verified by an external auditor. The Supplier is expected to keep accurate records of all business dealings with MTG in accordance with applicable accounting laws and regulations. The Supplier will collaborate with MTG and provide access for verification that its business dealings with MTG have been fully compliant with this SCC.

13.3 Information Sharing

The MTG expects its suppliers to influence and engage with their own suppliers to achieve the objectives outlined in this SCC.

13.4 Monitoring and Evaluation

When requested, suppliers must provide honest and transparent responses to the MTG Supplier Self-Assessment. The MTG reserves the right to audit suppliers' assessment from time to time, conduct onsite evaluations and inspections of its supplier's facilities, and those of their subcontractors supporting MTG's operations, to review the supplier's compliance against this SCC.

13.5 Grievance Mechanism

Suppliers are encouraged to raise any grievances or report any suspected violations of the SCC and MTG's Code of Conduct or its policies to its independent Whistle blower (to be named) described in its Whistle Blower Policy.

13.6 MTG reserves the right to introduce additional and/or specific supplier standard of behaviour, where applicable.