



Human Rights & Freedom of Expression Policy

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VERSION 2.0

1. Introduction

This policy outlines the steps that AFRICELL GLOBAL HOLDINGS Ltd (the “Company”) and its affiliates must follow to ensure compliance with the UN Guiding Principles for Business and Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at work.

2. Human Rights & Freedom of Expression

- The company respects the human rights of its various stakeholders across its entire value chain;
- The company respects all internationally recognized human rights e.g. freedom of opinion and expression and right to privacy.
- The Company strives to be compliant with all applicable rules and regulations in the countries where it operates;
- The Company respects the rights of its customers using its network and connectivity services and is against any form of discrimination;
- Customers have the right to freely and responsibly use the Company’s digital communications while ensuring that privacy and information security are upheld;
- The Company will, as and when permitted, continue to influence the development of new laws relevant to the telecommunications industry while ensuring that the impact on freedom of expression is limited;

3. Human Rights Due Diligence

The company implements a comprehensive human rights due diligence process that involves evaluating both current and potential impacts, incorporating the findings gained into actions, continuously monitoring effectiveness, and transparently communicating its efforts to address these impacts. This diligence extends to the company’s operations and supply chain. Moreover, the company prioritizes the early initiation of due diligence when embarking on new ventures, forming new partnerships or entering into business relationships.

The company is committed to enhancing its comprehension of the historical, legal, social, environmental, cultural, and political context in which it operates or plans to operate. This will enable the company to conduct a more comprehensive analysis of how its business activities and business relationships may affect human rights, both positively and negatively.

4. Responding to Government Demands

Under certain circumstances the Company may, based on requests from local government agencies, and in accordance with local laws and regulations, be required to:

- Restrict access to its services;
- Perform lawful interception and provide said government agency with actual communications;
- Disclose communications data;
- Shut down its network and restrict access to the internet;
- Perform IP/URL blocking and filtering by applying a filter at the network level.

The Company must, at all times, seek to respect internationally recognized human rights laws while being compliant with the applicable local laws in the countries where it operates.

Moreover, the Company will never go beyond what is required by law when responding to government agencies requests and must challenge every request and assess all options while comparing against its license terms and conditions prior to fully cooperating with the government agency.

Subsequently, the restriction is only enforced after a thorough assessment of the potential impact the restriction may cause and the availability of remedies to affected customers.

5. Grievance Mechanisms

- The Company will, by all possible means, protect its employees from any pressures enforced on them by regulatory or governmental agencies requesting unlawful requests.
- The Company's internal and external stakeholders are able to directly communicate anonymously any concerns they have via the Company's website or hotline.