



COMMUNICATION ON PROGRESS

YEAR: 2014/2015



MESSAGE FROM OUR CEO

H.E. Ban Ki Moon
Secretary-General
United Nations
New York, NY10017
USA

Dear Sir,

I am pleased to confirm that Airtel Networks Kenya Ltd reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

Since we became members in August 2014, we have made efforts to embed the principles of the United Nations Global Compact in our everyday work and ensure we operate in a sustainable manner.

As we submit our first annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Adil El Youssefi

CEO, Airtel Networks Kenya Ltd



Company name:
Airtel Networks Kenya Ltd

Sector:
Telecommunication sector

Number of employees:
313

UN Global Compact signatory since:
7th August 2014

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Who we are

We are part of Bharti Airtel Limited, a leading global telecommunications company with operations in 20 countries across Asia and Africa. Headquartered in New Delhi, India, the company ranks amongst the top 3 mobile service providers globally in terms of subscribers. In India, the company's product offerings include 2G, 3G and 4G wireless services, mobile commerce, fixed line services, high speed DSL broadband, IPTV, DTH, enterprise services including national & international long distance services to carriers. In the rest of the geographies, it offers 2G, 3G and 4G wireless services and mobile commerce. Bharti Airtel had over 328 million customers across its operations at the end of May 2015.

What we do

Airtel has been operating in Kenya since 2010, growing from strength to strength while maintaining and evolving its strong customer values and competitive services. In Kenya, we are the second largest telecommunication operator offering mobile services on 2G and 3G wireless service, telemedia service, mobile commerce and Airtel business for our enterprise consumers.

Some of our products and things we do include:

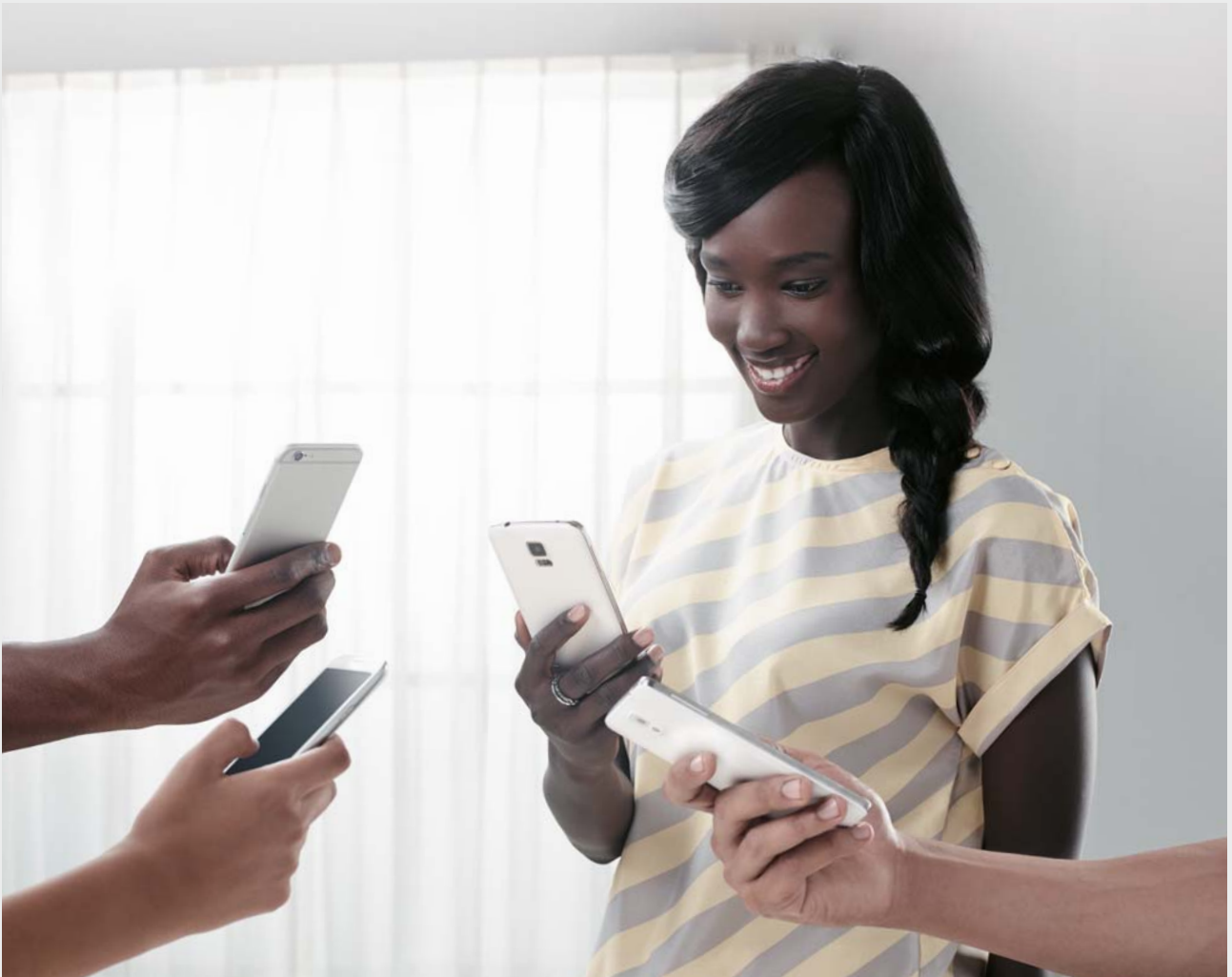
- **Airtel in the community:** Airtel is dedicated to empower, enable and unlock the potential of future generations to succeed in life. We are driven by the desire to unlock potential in our communities and through our CSR, we have the Internet for schools program through which, we offer students across the country free 24 hour access to the Internet, allowing them access to unlimited amount of educational material and information available online hence broadening their learning and their success in life.
- **Unliminet:** This is a unique and exciting product that continues to offer our customers the peace of mind and freedom to talk and remain connected to their world through the Internet. The product is destined to offer customers the convenience and freedom to make unlimited connections to their professional, family and social networks wherever they are.



- **Airtel Money:** Through its mobile money platform, the company provides e-commerce solutions including online payments, online banking, utility bill payments for electricity, DSTV, and water. Airtel Money currently has a vast dealer network of more than 12,000 active agents which include banks, bank agents, supermarket chains and Posta outlets.
- **Airtel Money VISA Card:** This is a card that allows Airtel money subscribers to access over 10,000 merchants nationwide and pay for goods and services using the Airtel Money Visa card or withdraw cash from any VISA accepted ATM nationwide.
- **Airtel Premier Club:** This is a unique club that presents a variety of unique offers and services from Airtel as well as other partners in various business sectors. The club enables premier customers to have personalized credit services such as credit facilities, an exclusive website, free SIM replacement, priority services and discount with preferred partners.
- **Mobile Virtual Network Operators (MVNO):** Airtel is the first player in the country to host the Mobile Virtual Network Operators, (MVNOs) on our network. They include:
 - ♦ Equity Bank, through its subsidiary Finserve Africa Limited (Equitel)
 - ♦ Zion cell Kenya Limited
 - ♦ Mobile Pay Limited
 - ♦ Kenya Airways which is awaiting the regulator's approval

The three will be operating on our network infrastructure to provide mobile phone services to their customers.

- **Investments in Kenya:** Airtel Kenya reaffirmed its commitment to Kenya with the announcement of an ambitious investment program totaling Kshs.19 billion over the next 3 years. The investment ensures that the Company delivers on its stated commitment to offer the most reliable and best quality network, products and services in the market.
- The investment plan will cover network upgrades for its voice and data services, shops, and brand equity development, customer service quality improvement staff training programs and community development programs across the country.



Our Vision as Airtel Kenya

To be a leading telecommunications services provider with over 12m customers and over 20% revenue share by 2020, enabling Kenyans to reach their potential and providing our employees with exciting growth opportunities

Extended Vision

- **People:** to be the preferred employer providing a workplace that inspires excellence and personal achievement
- **Regulator:** to inspire an open and respectful partnership with Government and partners
- **Customers:** to inculcate a customer centric culture that delivers insightful products and services to fulfill consumer needs
- **Shareholder:** to maximize long-term profitability in a responsible manner
- **Community:** to be a responsible citizen that supports sustainable goals of the people

Engaged Colleagues

- We deliver what colleagues expect and we develop them
- We have fun
- We exhibit true leadership

Winning teams

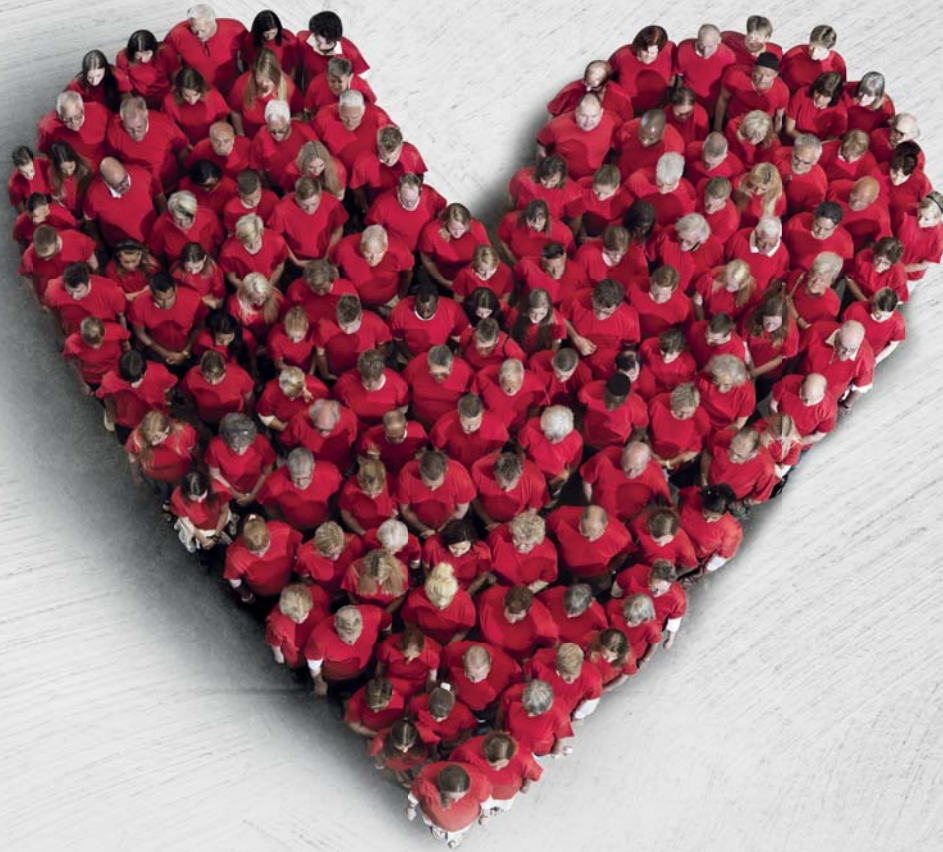
- We have the best people
- We are a team
- We align our structure and capabilities to our strategy

Relentless pursuit of execution greatness

- We deliver what we promise, we are performance driven
- We reach for the stars, we always look for more
- We are all MDs, we all have the power to influence outcomes

Customer Driven Strategy

- We understand the jobs our customers want to be done
- We focus on where we should play the game
- We focus on how to win the game



Our Values

- **Excellence:** be bold. Excellence makes no excuses
- **Customer delight:** a customer's smile is priceless
- **Innovation:** you must constantly innovate in order to stay relevant
- **Inclusion:** inclusion is all about giving people a sense of belonging and making them feel valued

Our six priority areas:

- Win with people
- Win with customers
- Win with data
- Win with Airtel Money
- Win in the market
- Win with operational excellence

Scope of this COP

This COP report covers our operational internal processes in relation to our customers, our staff, our suppliers and our community in adhering to the four main areas of the UN Global Compact: Human rights, Labour, Environment and Anti-corruption for the financial period 2014-2015.

HUMAN RIGHTS

UN Global Compact principles covered:

Principle 1: Business should support and respect the protection of internationally proclaimed human rights

Principle 2: Business should ensure that they are not complicit in human rights abuses

Our Commitment

Airtel as a company is committed to family-friendly policies that provide employees with a safe and conducive working environment in line with the international human rights as well as adequate resources to perform optimally in their roles. These policies are aligned to the employment act to ensure full compliance with the law.

A brief description of our Processes or System

- The company has an able HR team which ensures that the rights of its employees and stakeholders are adhered to and none is violated. These policies are made clear to the employees through the company's handbook.
- We have 26 annual leave days per year to all employees to enable them to have ample rest as required and are approved by respective line manager, 5 days compassionate leave for employees who are bereaved in their immediate family and those who are planning their wedding.
- Maternity/paternity leave: We also offer female employees (3) three months maternity leave with full pay in addition to their annual leave entitlement while male employees are entitled to two (2) weeks paternity leave.
- We have a Head of security, who is in charge of overall security, critical updates to staff, health and safety training and also a security policy that is updated annually and published on our internal staff portal for all staff to see and be informed.
- We also have in house fire marshals and first aiders on each floor and a mandatory floor audit every day by our contracted security vendor. These fire marshals show all new staff the emergency exits and explain the fire alarm procedures and how not to obstruct emergency exits.
- All employees who have any physical or hearing disability which could affect either their speed or ease with which they leave the building are aided by other employees
- The company also advocates for clean desks policy where all employees are expected to keep their working desks and areas clean at all times
- We provide a lunch space per floor for employees to enjoy their lunch break which is equipped with a fridge and a microwave for their use

- Our employees have access to tea and safe drinking water. Those based in the field are paid a separate pantry allowance to enable them to buy good quality drinking water

Activities we implemented in the last year

- Training on first aid and fire safety to selected employees who were chosen to be fire marshals and first aiders on their respective floors as part of our Safety Policy
- Fire marshals and first aiders wear their reflective jackets every Tuesday to create awareness to employees
- We implemented the clean desk policy to all staff to ensure that they maintain a clean and environment friendly desk
- All employees were taken through one fire safety and security training to equip them with the required knowledge
- The fire equipment and emergency exit are inspected every morning by the contracted security vendor
- Placing our Security policy on each floor as well as the evacuation plan for employees and public awareness.
- Installation of a new CCTV security system complete with live audio under the advice of the Head of security
- Installation of intrusion alarm systems in all our Base Transmission Station (BTS) in the field
- Deployment of armed police officers for employees safety
- Promotion of employees' expressions and concerns through an online survey to the HR department

Measurement of outcomes and value added for our company

- The Head of Security must submit audited safety reports to the Ministry of Labour every two years
- At least two fire drills must be executed in a year to inculcate a culture of safety awareness to all employees
- Occupational Safety and Health Performance: Number of fatalities, Lost Time Injuries (LTI), Fatal Injury Frequency Rate (FIFR) and Lost Time Injury Frequency Rate (LTIFR) have not been reported in the last year
- Tracking of leave accrual per staff member by HR and ensuring approved annual leave plans are in place so that employees commit to going on leave
- People survey results in terms of response rate, engagement index, manager index and employee net promoter score been at an average of 70%

Activities planned for next year

- Wellness week at least once a year to create awareness on pertinent health issues.
- Fire drill to inculcate the evacuation policy.
- Fire marshals wearing the reflective gear every Tuesday for easy identification and also awareness purpose.

LABOUR RIGHTS

UN Global Compact principles covered:

Principle 3: Business should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 4: Business should support the elimination of all forms of forced and compulsory labour

Principle 5: Business should support the effective abolition of child labour

Principle 6: Business should support the elimination of discrimination in respect of employment and occupation

Our Commitment

The company is committed to employee policies that are in adherence to the labour laws of Kenya, International Labour Organization (ILO) Conventions and other International Standards, eliminating all forms of labour malpractices and also enforcing a culture of Airtel being an equal opportunity employer in support to a zero tolerance attitude in respect to employment and occupation.

Airtel as a company states clearly that no staff shall be discriminated against due to sex, race, color, political opinion, HIV status and beliefs.

The company states clearly that each role will have a job description that outlines the scope and mandate of the role holder.

A brief description of our Processes or Systems

- We advocate the standard working hours for Airtel employees to be 40 hours a week and lunch break of 1 hour except those working on shift programs.
- We have a transparent disciplinary process that gives either party freedom to air their grievance before a final decision is taken be it a gross misconduct or a general misconduct.
- The recruitment process is structured and has a documented policy which strives to maintain diversity through gender, skills, race, values, attributes, and characteristics while offering equal opportunity to all potential candidates. We extend the same quality of selection to our vendors and partners.
- We don't recruit persons under the age of 18 years since it's a violation of children rights and we extend it to our vendors and partners and at the same time advocate for the abolition of child labour.
- We also have compensation and benefits policy where employees are entitled to some benefits that are additional to their salary and allowances.
- We have a learning and development policy where Airtel recognizes that employees are its most valued asset and commit itself to the best of its ability to provide an opportunity for continuous learning and professional growth towards organizational effectiveness.

Activities implemented in the last year

- Compensation and benefits road show to enlighten employees on the process and content of their benefits.
- Total reward statements sent to individual staff members for them to appreciate what the company is offering them.
- One training per year which falls under our Learning and Development Policy for the employee which supports growth of high potential employees with the aim of preparing them for senior management jobs in the future.

Measurement of outcomes and value added for our company

- Less demands from employees as they understand the recruitment process and their compensation plan
- Retention of staff
- Diversity in employment as we have a total of 313 permanent employees; 200 male and 113 female employees
- Our Senior Management commitment demonstrated in:
 - ♦ The re-launch of our organizational culture and values
 - ♦ Empowerment of staff through the Employee Hand Book and Ombudsman
 - ♦ Rewarding performance and desired behaviour in line with re-launched Company values
 - ♦ Consequence Management for non-compliance staff
 - ♦ Continued review of our processes and systems to ensure a solid control environment

Activities planned for next year

- Competency based interviews for line managers
- Cultural change within the company to embrace our new values of Alive, Inclusive and Respect
- Enforcement of leave management to ensure work life balance

ENVIRONMENT

UN Global Compact principles covered:

Principle 7: Business should support a precautionary approach to environmental challenges

Principle 8: Business should undertake initiatives to promote greater environmental responsibility

Principle 9: Business should encourage the development and diffusion of environmentally friendly technologies

Our Commitment

As a company, we are committed in ensuring that we operate and take initiatives that will promote our company as environmentally responsible and a company that embraces environmentally friendly technologies in its businesses.

A brief description of our Processes or Systems

We take precautionary measures in the work place environment to ensure we provide a safe environment for our staff through:

- Provision of motion sensor fluorescent lighting in our offices which has enhanced yearly savings.
- Provision of controlled printing through myQ badge swiping system to ensure that staff makes cautious efforts to print wisely.

We have taken measures with our customers to ensure we promote environmentally friendly materials through encouraging our suppliers to use Biodegradable materials for production of all our Rechargeable airtime vouchers.

Activities implemented in the last year

- Reduction of our Recharge Voucher sizes by 50% for Ksh 10, Ksh 20, & Ksh 50
- Commitment by our suppliers to produce Biodegradable Recharge Vouchers
- Implementation of Fire alarm suppression system
- NEMA compliance in all our facilities mainly carried out by Environmental consultants
- Compliance of statutory requirement
- Operationalized most of our systems to be IT based to save on costs
- Implementation of LED Tube lifetime lighting systems in the office

Measurement of outcomes and value added for our company

- Reduction in Monthly power cost: we have witnessed a Yearly Saving of USD 16,000; LED tube Lifetime saving of USD 196,000
- Reduction of cost of printing Recharge cards by 28% from USD 0.0032 to 0.0023 per card.
- Employees' positive feedback on the safe environment at the working place.

Activities planned for next year

- Promote a greener sustainable environment in the workplace through initiating an E waste management partnership with Computers for Schools Kenya (CFSK) to help us manage our electronic waste by ensuring proper recycling, recovery and disposal is conducted in an environmentally manner.
- Replacement of fluorescent lighting with LED lighting in our office.

ANTI-CORRUPTION

UN Global Compact principles covered:

Principle 10: Business should work against corruption in all its forms, including extortion and bribery

Our Commitment

Policy and Practice

Airtel Networks Management is committed to ensuring a corruption free environment; this is embodied in our Code of Conduct.

We also have a disciplinary Procedure and Consequence Management policy that helps outline correction and progressive process to address an employee's misconduct, Code of Conduct non-compliance or to prevent non-recurrence of undesirable behaviour.

Our Code of Conduct provide specific guidance on corruption related concerns such as fair competition, conflict of interest, acceptance and giving of gifts, improper payments, working with government and regulators and ethical advertising.

As per the Code of Conduct, employees are strictly forbidden to accept any bribe, improper payment or inappropriate favour of any other kind. Besides cash payments, such inappropriate payments would include:

- Kickbacks or kickback schemes, especially in form of cash
- Unexplained rebates
- Payments for advertising or disguised allowances or expenses
- Personal favours such as club memberships, entertainment and preferential treatment

Part of our Code of Conduct also touches on our gift policy which is to ensure that all staff act with integrity and all our decisions are based on only legitimate considerations.

Reporting of Acceptable Gifts and Entertainment

- All sponsored trips and gifts along with their estimated value must be reported on quarterly basis, in writing, to the Group HR and Administration manager in the office of the Group Human Resource Director.
- A consolidated report of all such trips and gifts (including those below the limit of USD 50 should be submitted on a quarterly basis to the Corporate Director Human Resources at the corporate office.
- The Group Internal Assurance function will review these reports and conduct any audit procedures considered appropriate and issue a monthly report to the CEO & JMD and AIMB.

The process the Disciplinary Committee follows regarding employee misconduct:

- The Reporting Manager- presents the case
- A Human Resource Representative- ensures that due process is followed and that all parties are protected and given a fair hearing
- A chairperson(A Head of Department or Function according to the case) – moderates and makes the final decision in consultation with all the panel members
- A representative from Legal – takes all the minutes- and ensures these are signed by everyone as true copy of the conversation held
- Internal Audit or any other party depending on the case - for their expert and professional input
- An independent investigator if it is a fraud case or whistle blower case
- Representative from another department as an additional team member

All disciplinary action taken will follow the principles of natural justice which include the following:

- The employee who commits the misconduct should be informed about the details of the offence including the time, period, and exact nature of misconduct
- The employee should be given a chance to explain his position and any evidence levelled against him should be produced to allow him defend himself
- The officer (s) responsible for deciding on the issue/offence should not have any personal bias/ monetary (pecuniary) bias or bias relating to the subject matter under enquiry

In cases of dealing with fraud. We take the following steps:

- Where necessary, employee disciplinary action is taken and criminal proceedings instituted where evidence is sufficient
- Preventive measures for fraud cases:
 - ♦ Engagement by our Risk and Compliance manager
 - ♦ If our systems have been compromised, system weakness corrective re-engineering is done
 - ♦ Issue a claim from insurance
 - ♦ Where third party agent is involved we issue a claim from partners
- Improved IT system, consequence management, improved processes and procedures, review of third party SLAs and court processes.

A brief description of our Processes or Systems:

- Our processes are guided by Policies and Process Documents. Some of these are as prescribed by The Head office or as customized for the Country operations.
- All our core functions and operations are automated and the systems monitored continuously for fraud prevention and response to business requirements.
- We recently implemented a new CRM (Customer Relationship Management) system which is expected to improve efficiency in core customer processes including activations, billing & reporting. The system shall be integrated into Oracle - our Financial Reporting System hence reducing reconciliation errors which are sometimes subject to manipulation
- For non- automated processes, we have in place robust manual processes to mitigate business and operational risk
- The processes are both preventative and detective in nature. We have continuous monitoring of reports from the system and corrective action mechanism (e.g. Consequence Management) where any frauds or non-compliances are noted

Activities implemented in the last year

- Became a part of UN Global Compact and committed to implementing its standards
- Communication and Annual signing of Code of Conduct by all employees
- Institution of the OpCo (Operating Country) Internal Audit Committee which will include all Functional Directors and is aimed at ensuring closure of all audit lapses noted and implementation of fraud closure recommendations
- Power of Potential campaign- Re-launch of Organisation values, vision and organizational culture which stipulates key organizational behaviours' and practices
- Re-launch of the Consequence Management Policy in line with cultural rebirth
- Revamp of numerous operational processes and policies
- Implementation of i-procurement system – a transparent online based system for tenders and bids to prevent any instances of collusion between staff with vendors
- Review of contracts with key vendors to ensure robust governance clauses included to avoid grey areas
- Regular governance meeting with key vendors. Periodicity of governance meetings are based on Category of vendor. For example on a monthly basis for key strategic partners and quarterly basis for other routine vendors.
- Implementation of fraud escalation matrix which stipulates the communication and recommended closure process of all revenue leakages and frauds.

Measurement of outcomes and value added for our company

- Increased transparency for example with regards to procurement decisions. With the procurement system, information on changes to bids or negotiations are broadcast to all bidders, closure of bids is automated and grievance resolution is monitored with system escalations to relevant staff.
- Reduced fraud events or incidences and revenue leakages.
- Reduction in Customer Resolution timelines
- Ethics and values measures; the company issued warning letters to two employees as a way to curb corrupt dealings or violation of the company's code of conduct
- Increased sensitization of policies to reduce instances of corrupt dealings

Activities planned for next year

- Monthly review of behaviour indices in line with re-launched Company values for each individual employee (Here I am referring to Employee of choice indices such as integrity)
- In order to improve communication of processes and compliance programmes finalization of an organization wide process and policy repository
- Receipt of vendor's annual signoff of compliance to our Code of Doing Business which is guided by the Code of Conduct
- Trainings on key and new policies including on employee e-learning modules
- Full Implementation of a fully automated Fraud Management System (FMS) for entire GSM and Mobile Money Business, current FMS is only partly implemented
- Extending the training and annual sign-off of Code of Conduct/ Compliance by key strategic partners

How do you intend to make this COP available to your stakeholders?

We intend to communicate to all our stakeholders through:

- Upload the COP report on our official Airtel website
- Communicate to our customers and media stakeholders through email

DONATIONS AND AWARDS

Airtel Kenya in line with Bharti philosophy of giving back to the society tries as much as possible to implement this philosophy in diverse ways. By doing so, it ensures that more people especially the least privileged get equal opportunities.

We support the community in various activities among them are:

- **Internet for schools program** - This being a business strategy of transforming Airtel into an Internet company, Airtel plans to roll out access of internet in schools and other institutions as a way of empowering the society and building the Airtel brand. Airtel Kenya under the flagship of CSR started the Internet for schools program where free internet was to be connected to various schools. These schools will be able to get free 24 hours internet connectivity which will be of help to students to undertake their daily learning experiences and broadening their knowledge with the unlimited access to educational information from the internet. We intend to improve the education sector in the country and we believe that with free Internet, it will be a step up to achieving that.

Airtel Kenya has also partnered with the British Council and Peace Global Foundation in order to implement it in some of the schools identified in their sponsorship program.

So far we have managed to connect more than 169 schools and institutions and more to come with free internet connectivity. This means more than 250,000 students benefiting from the unlimited amount of educational material and information available online.

The plan to connect at least 1 million students with the free Internet before the end of our financial year shows the commitment that Airtel has to this program and this will be an achievement implemented by the Social Responsibility Policy.

We strive to improve the education sector in the country not only through internet connectivity but also through many different ways where we believe it will impact the students positively. These initiatives will help them achieve their educational goals and what they would want to achieve in life.



These initiatives include:

School Bag donation where students from Silala and Koinange Primary schools were given schools bags where they could carry their school books with ease



Solar Lamps donation where Airtel Kenya donated 280 solar lamps to 26 primary schools in Machakos County who had challenges in accessing electricity



School books donation at Baobab Children's Home in Coast zone and Tiengere Primary in Nyanza which saw students receive writing and reading books for their learning activities



Furniture donations (office & classroom) were made to schools to ensure that students experienced a conducive learning environment



Mogra Star Academy Mathare school program where Airtel Kenya started a feeding program for more than 900 children and also started paying teachers' salaries for the period of two years that the partnership will last. This we believe will help the students stay in school and concentrate more in class not worrying about what they will eat. It will also motivate teachers because now they will be well taken care of.



- **Employee volunteerism** - The Airtel Spirit encourages a selfless giving of time on both an individual and at corporate level. As Airtel employees, we feel that we have a great deal of career and life experience to contribute. We find it important to share this experience with students. It is for this reason that the Airtel Mentorship Program was launched in October last year.

So far staff members have been to Jesus Love Ministry in Eldoret, Mukuru Promotion Centre in Nairobi and Mogra Star Academy to offer their personal experience on success and the importance of reading and finding a career that they love, how to prepare for exams and develop skills that they can use in their future.



- **Health** - A healthy Nation is a progressive Nation and Airtel Kenya shares the same belief.

With the Ebola outbreak in West Africa that brought a scare to people, Airtel partnered with the African Union (AU) Commission to garner resources in support of Ebola affected countries in West Africa. The initiative, known as **'The Ebola Solidarity Campaign'** used an SMS dedicated platform to raise funds from citizens for the deployment of African health workers to affected countries.

We also run for a good cause. Airtel Kenya supported the First lady's initiative, Beyond Zero Campaign, to ensure that mortality rate in our country is reduced. During the International Women's Day, the Airtel Divas took part in the Marathon where they participated in the 10KM Corporate Race. This was in the spirit of raising money which will enable the purchase of 26 mobile clinics for the remaining counties in addition to 21 already donated last year by the 1st Lady.

We have also provided free internet connectivity to the Ministry of Health at Emergency Communication Centre and Centre for Excellence. This will enable more medical research on the internet and 24 hours access to unlimited information on the same from the internet.



- **Environment** - Airtel Kenya adopted Kipeto Primary school after visiting several needy schools in the country. This initiative was to help the school improve its infrastructure and the first intervention was to improve sanitation in the school through the rehabilitation of a borehole which had been dormant for years.

We have also supported I-Afrika biogas project which will help produce environmentally friendly fertilizer and cut cost in fuel and electricity expenses. This will ensure the conservation of the environment and production of clean and cheaper energy sources.

Rotary Club of Nairobi East donation towards a water harvesting program at Enkeriyan primary school in Kajiado.

We have participated in the Eastland's clean up where Airtel staff came together to clean the Kinyago slums that had posed a huge health threat. The exercise in partnership with the area youth group- Jitolee Pamoja Youth Group also saw Eastleigh South District Officer (D.O) Charles Muiruri, Kinyago area chief Rose Ayere and Sub-Chief, Joshua Karanja participating. We also donated some cleaning materials to the youth centres in the slum which will enable them do the clean up once a week.

