

COMMUNICATION ON PROGRESS REPORT YEAR: 2018/2019

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Message from our CEO

To our stakeholders,

Airtel Networks Kenya Ltd continues to imbed the United Nations Global Compact principles in our business strategies and operations in order to ensure that we carry out our business responsibly whilst keeping our commitments to the societies that we operate in.

As an organization, we have aligned our business growth with the social and economic wellbeing of the communities we engage with. As such, we are continually working towards achieving the greatest positive impact through our business practices.

We are glad that 5 years later, as members of the UN Global Compact initiative, we remain committed to the cause of the United Nations Global Compact initiatives and we continue to work towards ensuring that we operate in an inclusive and sustainable manner.

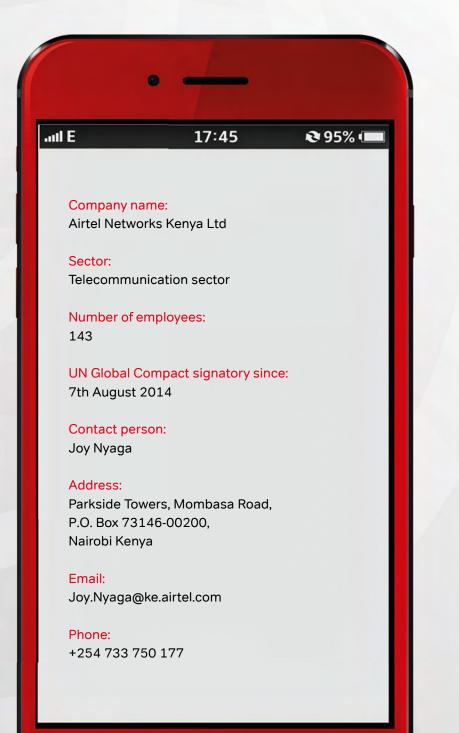
Sincerely yours,

Home .

Prasanta Das Sarma CEO, Airtel Networks Kenya Ltd

irtel Networks Kenya Ltd

COMMUNICATION ON PROGRESS REPORT



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Who we are

We are part of Airtel Africa, a leading provider of telecommunications and mobile money services, with a presence in 14 countries in Africa, primarily in East Africa, Central and West Africa. Airtel Africa offers an integrated suite of telecommunications solutions to its subscribers, including mobile voice and data services, fixed data as well as mobile money services both nationally and internationally. Airtel Africa aims to continue providing a simple and intuitive customer experience through streamlined customer journeys. Airtel Africa had over 100 million customers across its 14 countries as at August 2019.

What we do

Airtel has been operating in Kenya since 2010, serving 12.8 million customers (based on the Communications Authority of Kenya, Sector Statistics Report, April- June 2019) across the country. In Kenya, we are the second largest telecommunication operator offering mobile services on 2G, 3G and 4G wireless service, telemedia service, mobile commerce and Airtel business for our enterprise consumers.

Airtel's focus as a leading telecommunications company is to ensure that all our customers get the best experience and enjoy the best value for their money wherever they live, work or travel. We strive to ensure that our customers receive the latest and most innovative products and services at the most competitive price.

Investments in Kenya

We are committed to continue delivering quality and value for money products and services as we ensure effective, uninterrupted communication is achieved across the country for all our customers.

Airtel's investment plan in enhancing the network has seen the roll out of 2G, 3G and 4G sites across the country and we continue to expand our network capacity with the ultra-fast 4G technology. This is aimed at improving our customer experiences by significantly increasing network capacity, quality of service and enhancing mobile data speeds thus allowing Airtel customers to enjoy better internet and voice services.

We continue to innovate and launch new and exciting products and services that are aimed at making the lives of our customer simpler and offer value for money. Our investment in offering quality customer service, empowering our staff through training and development and positively impacting our communities, remains at the core of our business strategy.

Our Mission

Airtel through its services, Voice, Data and Airtel Money, is committed to making the lives of its customers easier by creating a digitally connected world. We aim to continue providing a simple and intuitive customer experience through streamlined customer journeys.

Our Vision

Our vision is to enrich the lives of customers. Our obsession is to win customers for life through an exceptional experience.

Our Values

Alive

We act with passion, energy and a can-do attitude. Innovation and an entrepreneurial spirit drive us

Inclusive

We champion diversity. We anticipate, adapt and deliver solutions that enrich the lives of the communities we serve.

Respectful

We share the joy and pain of our customer. We act with humility and are always open and honest.

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 2018-2019.



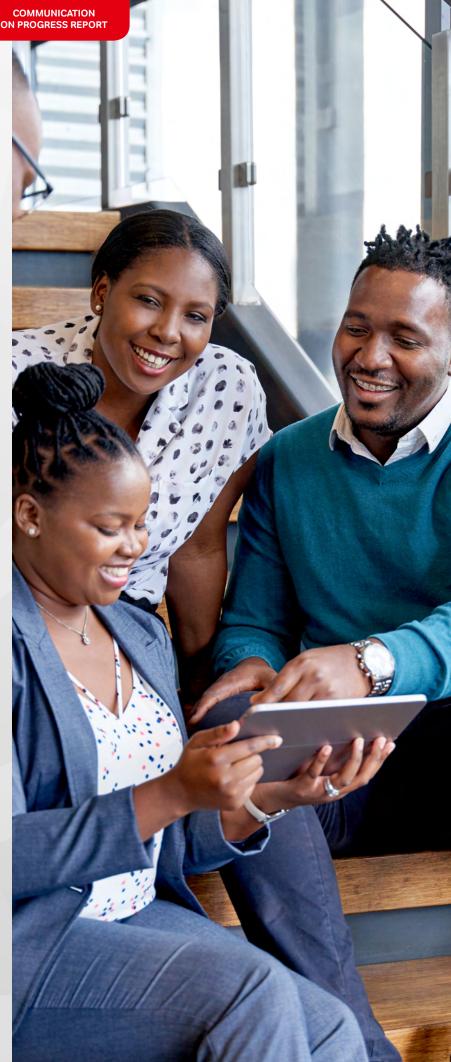
Human Rights

Our Commitment

Airtel as a company is committed to 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 Systems**

- 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. We also offer 5 days' compassionate leave for employees who are bereaved by their immediate family and for those who are planning their wedding
- Maternity/paternity leave: We 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 the Head of security, who is in charge of overall security, critical updates to staff, health and safety training and also creating awareness amongst employees on the security policy that is updated and published annually
- We have provided our female employees with a private mother's room
- We have well-articulated policies that govern the employee employer relationship. These are issued to all employees during the on boarding process



Airtel Networks Kenya Ltd

Activities we implemented in the last year

- Trained staff on two new policies governing Sexual harassment and Official Travel requirements
- All staff attested to our Code of Conduct (CoC) and the Anti-Bribery and Anti-Corruption (ABAC) policies.
- We held a HR week in which we published new policies and organised a medical camp where staff were taken through various checks.
- · Creation of an innovation mailbox for staff to share ideas to help or better the business

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
- 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

Activities planned for next year

Training of staff on policies and building awareness and compliance to the company values

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Labour Rights



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. This is in line with SDG 8 that highlights on decent work and Economic growth.

Airtel seeks to protect the labour rights and promote safe and secure working environments for all its employees.

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

- One of our core values in Respectful We share the joy and pain of our customers. We act with humility and are always open
 and honest
- 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 have zero tolerance on fraud and this is clearly articulated to staff through annual Code of Conduct refresher training
- We have a learning and development policy where Airtel recognizes that employees are its most valued asset and commits 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

- Mandatory E learning courses for training and development of staff. Employees went through courses that gave an in-depth understanding into both the technical and financial aspects of the telecommunication industry as well as helped them to build on their analytical capabilities
- At least 2 trainings per staff were undertaken. This 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
- Quarterly Africa staff town halls to keep employees informed on our progress against set targets

Measurement of outcomes and value added for our company

Our Senior Management commitment demonstrated in:

- Coaching their direct reports to be able to build the next line of management for the business and handle the dynamics
 of the telco business
- · Continued review of our processes and systems to ensure a conducive working environment

Activities planned for next year

- Enforcement of rigour and discipline in our ways of working
- Popularize and continue to drive awareness and uptake of E learning by employees
- Enforcement on leave management to ensure work life balance by making it part of their annual goals

Environment

Our Commitment

As a company, we are committed to 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.

Activities implemented in the last year

- Carried out the Occupational Health and Safety audit as well as a risk assessment of all our business premises in compliance with
 the Occupational, Safety and Health (OSHA) Act of 2007. A satisfactory audit was done and a registration of workplace permit
 was issued
- Mandatory National Environment Management Authority of Kenya {NEMA} audit on our sites to evaluate risks and set up corrective measures as guided by the various National Environment Management Authority of Kenya regulations on waste management and pollution control

Measurement of outcomes and value added for our company

- Compliance with the various regulations that advocate for environmental friendly activities have ensured that our business permits are always renewed
- · Provision of a safe environment for our employees has led to increased efficiency and productivity

Activities planned for next year

- Annual Occupational, Safety and Health Audit and risk assessment
- Annual NEMA Audit of our Base Transceiver Stations

Anti-corruption

Our Commitment

Airtel Networks Management is committed to ensuring a corruption free environment. Corruption is fought at three levels through:

- Nurturing a culture of compliance Through Compliance awareness trainings, compliance reviews, reporting to relevant authorities and corrective actions for all non-compliance cases identified
- Ethics Management setting the right tone from the top by cultivating and fostering a culture of high ethical standards; and
- Integrity Ensuring full compliance as embedded in our Code of Conduct and Anti-Bribery Act Compliance policy.

Policy and Practices

Our code of conduct is a public declaration of how we do business and clarifies expectations from ourselves as key stakeholders. It also sets the framework for implementation of our corporate policies and guidelines.

Integrity and ethical conduct are pivotal in the way we do business. The provisions of the code reflect the values of our company and affirm the company's commitment to the highest standards of integrity and ethics in the conduct of our business.

The values which shape our business ensure that we make ethical choices and our Code of Conduct sets forth our commitment to always operate with integrity and transparency. Ethical behavior is non-negotiable in our operations and it is our fundamental responsibility towards our customers and partners.

A brief description of our Processes or System

Airtel has zero-tolerance to bribery and corruption. Consequently, Airtel employees are mandated at all times to act with integrity and ensure that all decisions are based on legitimate considerations.

In building and maintaining relationships with various stakeholders, employees focus on creating trust and mutual respect based on the principles laid down in the Code of Conduct.

In line with the Anti-Bribery and Corruption Framework, our key processes revolve around Prevention, Detection and Response;

- Employees are forbidden from making or receiving bribes or kickbacks or engaging in any other form of corruption, regardless of local customs
- Employees may not make, authorize, offer, or facilitate a payment to anyone to gain or retain business or an improper business advantage. Nor may they accept any such payment
- At Airtel, money is not considered as the only form of bribery. A promise of employment for a relative, a charitable or political contribution, gifts, meals, entertainment, unexplained rebates, offers of employment, payments for advertising, disguised allowances or expenses, and personal favours such as club memberships may all constitute bribes if made as part of a quid pro quo arrangement to obtain certain services.
- Employees are not allowed to make facilitating or "grease" payments to any government official to facilitate or expedite a routine government action to which one is legally entitled (e.g., the issuance of a visa or customs approval).
- In addition to the rules set forth in the Policy, employees must also follow all local laws regarding corruption.

Activities implemented in the last year

- Senior Management training on cyber security
- Employee annual code of conduct certification sign off
- Implementation of Compliance KRA's (Key Result Areas) as part of employees' performance review, in order to embed compliance in day to day operations
- Training of our sales agents and field staff on the various compliance measures instituted e.g. Anti Money laundering
- Vendors annual signoff of compliance to Anti-Bribery Act Compliance and Code of Business
- · Inclusion of Ethics and Compliance processes in on boarding of all new employees

Measurement of outcomes and value added for our company

- Improved Turn Around Timelines on customer queries and complaints
- Ethics and values measures; Few disciplinary cases reported and corrective measures administered
- · Reduced cases of non-compliance as a result of alignment of the Key Results Areas to compliance requirements

Activities planned for next year

- Annual Employee training and certification on Anti-Bribery and Corruption
- Annual Employee Signing of Code of Conduct
- Annual Vendor and other third parties Code of Business Ethics signoff
- Continuous training of staff and agents on Anti-Money Laundering
- Supply Chain, Procurement and Facilities' departments training on Energy management, waste disposal and environmental conservation

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, awards

As a responsible organization, Airtel aligns its business growth with the social and economic wellbeing of the communities where we operate in. Our programs are executed at a local level through our employees, thereby directing contributions to areas of greatest impact in the particular regions. Our activities are pegged on advancing both local and continental goals while fostering partnerships with various stakeholders who not only help us to positively impact our communities but also advance our business objectives.

Airtel continues to positively impact the community through the following activities:

Education

One of the key pillars of our social impact activities is on education where we advocate for the use of our technology and expertise in enforcing positive change amongst our subscribers across the country. This is anchored on championing SDG Goal 4 on Quality Education that strives to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

Global Peace Foundation Kenya in Partnership with Airtel Kenya, Oracle Academy, and IBM East Africa Organizes a 3 Day Teachers Boot camp.



Global Peace Foundation Kenya in partnership with Airtel Kenya, Oracle Academy, and IBM East Africa organized a 3-day teacher's boot camp at Lukenya Boys in Kajiado County under the theme dubbed "ICT Integration in Teaching and Learning". Teachers from various schools and counties were invited to the boot camp with representatives from Machakos High School, Ituru Girls Secondary School, Rombo Secondary School, Moonlight High School, Maryhill High School, Chania Boys, Jamhuri High School, Moi Forces Academy, Kariobangi North, Ol'Kejuado High School, Karama Secondary School, Lukenya Girls, Lukenya Boys and Lukenya IGCSE.

The focus of the boot camp was to reinforce the need for ICT integration in our education system in order to equip students with job market skills once they complete their education. Teachers were encouraged to support the introduction and use of ICT in their teaching by equipping themselves with the necessary skills that would then help students to acquire the same skills as well. The teachers were also trained on cyber security and the various risks posed by the use of internet for learning.

Airtel offered routers and free internet access to some of the schools present as part of its Free Internet for Schools Program that provides access to the internet to enrich student's quality of education. Airtel continues to work with The Global Peace Foundation (GPF) to provide free internet connection to over 60 Hubs located in schools around the country. The high speed broadband access to the hubs guarantees teachers and students limitless new educational opportunities. The Hubs in schools serve as ICT Centres for teachers, students and the wider communities around the hubs.

Employee volunteerism

In the true Airtel spirit of selfless giving of both our time and skills sharing, Airtel employees took time off their busy schedules to offer mentorship to some high school students as part of our staff mentorship program.

Mentorship

Airtel's mentorship program continues to impact the community



The Airtel Kenya mentorship program is an avenue for the staff to give back to the community. It continues to positively impact the lives of students at the Mukuru Promotion Centre. Now in its 5th year, the mentorship program has so far impacted the lives of almost 1,000 students at the St. Michael's Secondary School since its inception.

In the month of August, staff representing different departments took time off their busy schedules to share their experiences and achievements to motivate the Form one and two students at the school that is located within Mukuru Promotion Centre. This is in line with the true Airtel spirit that encourages selfless giving in community development initiatives at both individual and corporate level.

The mentorship program continues to impact the community in which Airtel operates, as through these encounters, the students are motivated and encouraged to beat the odds that face them by striving for success, embracing the importance of having an education as well as identifying careers that they love and develop skills that they can use in their future. The partnership between Airtel and the Sisters of Mercy who run the promotion centre also includes sponsorship of needy students by paying for their school fees every year.

Mukuru Promotion Centre has over the years served as an oasis that seeks to establish and operate a holistic and sustainable health, educational and social development program which addresses the basic needs of the most vulnerable in the community.

Health

Airtel Kenya remains committed in advocating for SDG 3 which champions for quality health and well-being. Airtel through its collaborations with like-minded partners, offers support to communities by contributing and participating in activities that are geared towards realizing Universal Health Coverage.

Airtel staff represented at the 2019 Beyond Zero Half Marathon



As espoused in the Airtel Spirit which champions for selfless giving in the communities that we engage with, Airtel staff participated in this year's Beyond Zero Half Marathon.

The 2019 Beyond Zero Half Marathon sought to celebrate all those who have partnered with Beyond Zero throughout the years. The Beyond Zero Initiative has used the Half Marathon as the anchor fundraising platform, raising funds and resources to bring to focus key challenges facing Kenyans and build strategic partnerships that will address these challenges.

Launched in January 2014 by Her Excellency Margaret Kenyatta, the First Lady of the Republic of Kenya, Beyond Zero was inspired by the realization and knowledge that maternal and children deaths are preventable. Beyond Zero is a call to action for policy prioritization and formulation, increased resource allocation, improved service delivery and better individual health seeking behaviors and practices. The selected areas of intervention are premised on the need to build on Beyond Zero's previous efforts to sustain gains, leverage on existing initiatives and evidence of socially excluded health needs and well-being of Kenyans. The areas of intervention include;

- · Promote access to quality maternal and neonatal health care services, repair and reintegration of women with obstetric fistulae.
- Champion the country validation for the pre-elimination of mother to child transmission of HIV and Syphilis by 2021.
- Promote nutrition during early childhood education and social inclusion of children living with disability for equal access to health and education services.

Airtel Kenya also contributed towards the Beyond Zero Free Medical Safari held in West Pokot County. Through its contribution, Airtel helped in the purchase of drugs and supplies to be used for screening and start treatment of cervical cancer.

Awards received

Airtel's Marion Wambua selected as UN Global Compact Network 2019 Sustainable Development Goals Pioneer



Marion Wambua, Senior Communication and CSR Executive at Airtel Networks Kenya, was selected as a leading advocate for quality education. She has worked to design Airtel's social responsibility strategies that address many of Kenya's social and economic challenges.

Airtel is the second largest telecommunications company in Kenya and has been an active participant in the UN Global Compact since August 2014. The company is innovating and diversifying to reach a wider segment of the market with portfolios that meet Kenyans needs, contribute to development, and balance network quality and reliability.

Marion has worked tirelessly to align Airtel's corporate strategy with defined Sustainable Development Goals (SDGs) with a focus on good health and wellbeing (Goal 3), quality education (Goal 4), clean water and sanitation (Goal 6) and sustainable cities and communities (Goal 11) while leveraging on strategic partnerships to drive impact.

In delivering quality education in underserved communities, Marion is spearheading the Free Internet for Schools program, which has succeeded in connecting over 300 schools across 30 counties in Kenya. The program is providing access to information and educational resources to students thereby increasing opportunities for learning in and beyond the classroom. She is directly involved in vetting the schools to ensure they are suitable to participate in the program and provides follow up support to address any technical issues that may arise.

Marion also manages Project Ngulia, a partnership between Airtel and Ngulia Rhino Sanctuary located in Tsavo West National Park by offering tracking and monitoring services as well as providing water tanks to schools around the national park to address the challenges of human-wildlife conflict which have worsened over time due to water scarcity.

The two projects leverage on Airtel's core strength in providing technological solutions to meet SDG challenges.

Marion has also been an avid advocate of the 10 Principles of the UN Global Compact both within the company and externally with various partners - creating awareness and sharing the good practices the company is embracing to advance SDGs.

The Annual Changemaker Awards

Environment Conservation Award, Gold Award

The Changemaker Awards provide an opportunity for Airtel Africa operating companies to showcase the commendable CSR work they have been undertaking in the respective markets.

During the 9th edition of the Changemaker awards, Airtel Kenya was awarded the Gold Award under the 'Environment Conservation Award'. The award was in recognition of Airtel Kenya's partnership with Project Ngulia, a "tech for conservation" initiative that aims to develop and deploy technology such as long-range radar, motion and heat tracking sensors, combined with Artificial Intelligence (AI) to assist in animal conservation. Project Ngulia has successfully managed to set up a real-time "communications, command, and control" system that streamlines security functions in Ngulia Rhino Sanctuary. Project Ngulia therefore approached Airtel Kenya to help improve the network. Airtel upgraded the hardware at the nearest base station. This provided nearly 90% 3G coverage to the Ngulia Sanctuary. Airtel also donated SIM cards, which are topped up monthly with an SMS + voice + internet data bundle that allows the project to continue to run smoothly to date. It is strongly believed that the implemented system has contributed to the success of the rangers on the ground, by helping them become more effective and efficient.

