

Code of Conduct



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DIGICEL CODE OF CONDUCT

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SECTION 1

Introduction



Message from Group CEO

Dear Team,

I am thrilled to introduce our updated Code of Conduct, a foundational document that embodies our commitment to fostering a workplace where diversity thrives, integrity guides our actions, growth is nurtured, and innovation flourishes. At Digicel, we believe that embracing these core values not only enhances our organisational culture, but also empowers us to deliver excellence in everything we do.



Diversity is at the heart of our community, where we celebrate and respect the unique perspectives, backgrounds, and experiences of every individual. We believe that by embracing diversity, we enrich our creativity, enhance our decision making, and create a more inclusive environment where everyone can thrive.

Integrity lies at the core of everything we do. It is about doing the right thing – always. Our commitment to integrity ensures that we conduct ourselves ethically and transparently in all interactions, both internally and externally. Trust is our currency, and we must safeguard it at all costs.

Growth is not merely about expanding our business, but also about personal and professional development. We encourage continuous learning, adaptability and resilience. Embracing change and challenging ourselves to improve enables us to seize new opportunities and stay ahead in a rapidly evolving world.

Innovation is our pathway to the future. We encourage bold thinking, experimentation and creativity. By embracing innovation, we can drive meaningful progress and deliver exceptional value to our customers and stakeholders.

Our Code of Conduct serves as a guiding light, ensuring that each of us upholds these principles in our daily interactions and decisions. It sets the standard for how we conduct business and reinforces our commitment to building a culture of excellence and integrity. I invite each of you to familiarise yourselves with the Code of Conduct and integrate its principles into your daily work.

Thank you for your dedication to our shared values and for your contributions to our collective success.

Warm regards,

Signed by:
Marcelo Cataldo
32E77C44630444D
Marcelo Cataldo

Our Values

D

Diversity

Meaning: You're one of us and your perspective matters

Behaviours: We are Respectful, Accepting and Empathetic

I

Integrity

Meaning: You're committed to doing the right thing-always

Behaviours: We are Responsible, Trustworthy and Transparent

G

Growth

Meaning: Your drive for excellence and the pursuit of goals sets you apart

Behaviours: We are Customer obsessed, Collaborative and have our eyes on the Prize

I

Innovation

Meaning: You're always finding new and better ways to get it done

Behaviours: We are Creative, Flexible and Driven



Compliance is Everyone's Responsibility!

Digicel's obligations and commitment

At Digicel, integrity is at the center of everything we do. We are committed to doing things right and doing the right things, which includes complying with applicable laws, regulations and ethical standards. Our Code of Conduct outlines Digicel's commitment to ethical and compliant conduct along with our role in ensuring compliance.

Digicel Personnel (which includes employees, directors, officers, and contractors) and (where appropriate) those acting on Digicel's behalf, *must always* abide by our Code of Conduct, other Digicel policies and procedures, and applicable laws. Failure to comply with the Code of Conduct, policies or applicable laws could result in disciplinary action, up to and including termination. The Digicel Disciplinary Policy ([click here](#)) provides additional information.

Your Role

- Be respectful and professional in all business interactions and work-related encounters both internally and externally.
- Know and comply with our Code of Conduct, policies and applicable laws.
- Promote a culture of compliance and ethical conduct and lead by example.
- Observe the highest standards of professionalism and ethical conduct in dealing with your colleagues and outside parties with whom we do business, including suppliers, competitors, regulators, and company representatives.
- Manipulation, misrepresentation of material facts, or other unfair practices are prohibited.
- Raise concerns about suspected misconduct, including violations of applicable laws, our Code of Conduct, and other Digicel policies.
- Never speak on the Company's behalf unless you are authorized to do so. This includes responding to media requests for information, giving outside presentations about Company matters, or responding to inquiries from shareholders or other third parties. If you receive a request for information from an outside person or organization, contact the Group Communications Team.
- For leaders, provide resources and support to your teams to address compliance issues, document and escalate concerns, and take corrective actions where necessary.

Speak Up!

Speak up with integrity and care.

Digicel's Obligations and Commitment

Digicel takes seriously concerns of potential misconduct. All allegations of misconduct are triaged to determine how best to address them, including whether there is a basis for an investigation. When an investigation is warranted, the allegation will be investigated professionally, thoroughly, and fairly. We do not tolerate retaliation against any employee who raises a concern in good faith and/or participates in an investigation. "Good faith" means there is a genuine belief that misconduct has occurred or will occur.

The Digicel Speak Up Policy (click [here](#)) provides guidance on how to raise concerns about misconduct as well as how those concerns will be treated.

Your Role

- **Speak Up!** if you see or suspect unethical, non-compliant or unsafe conduct of any kind.
- **Provide** as many details as you can to enable us to assess and investigate your concern.
- **Cooperate fully and truthfully** during an investigation.
- **Do not** make false accusations or use the Speak Up! process to harass others.
- **Do not retaliate** against anyone for raising a good faith concern or participating in an investigation.

Channels for Raising Concerns



You can raise a concern about potential misconduct using any of the following Speak Up! channels: email

- Supervisor/Manager
- Group or Local Human Resource Team
- Group or Local Legal and Regulatory Team
- Group Ethics and Compliance Team at compliance@digicelgroup.com
- Group Internal Audit Team
- Speak Up! Web Portal: <https://integritycounts.ca/org/digicelgroup>
- Speak Up! Email: digicelgroup@integritycounts.ca
- Speak Up! Hotline:
 - 1 (800) 279-3120 - Anguilla, Antigua & Barbuda, Barbados, Bermuda, British Virgin Islands, Cayman Islands, Dominica, Grenada, Jamaica, Montserrat, St. Kitts & Nevis, St. Lucia, St. Vincent & Grenadines, Trinidad & Tobago and Turks and Caicos;
 - 599 9 788 9977 - Curacao;
 - 0800-911-333 - Guadeloupe;
 - 0800 90 6837 - Martinique;
 - 0800-912-125 - French Guiana; and
 - 503 2113 3117 - El Salvador, *Aruba, *Bonaire, *Guyana, *Haiti, *Suriname.

***No in-country phone number is available, please use the El Salvador number. Long distance fees may apply.**

Digicel's Speak Up! Hotline, Email and Web Portal are operated by an independent third party and allows for open or completely anonymous reporting.

SECTION 2

Our Commitment to Each Other and Our Communities



Fair & Inclusive Employment Practices

Embrace diversity, and do not harass, bully, or discriminate against others.

Definitions

A diverse workforce is one that embraces people from different backgrounds or identities.

Harassment refers to verbal and/or physical conduct that threatens, intimidates, or demeans a person.

Discrimination occurs when a person is harassed or treated differently because of the person's perceived sex, race, national origin, disability, age, religion, marital status, pregnancy, or genetic information.

Workplace Bullying refers to a persistent pattern of mistreatment from others inclusive of harassment and discrimination in the workplace that causes either physical or emotional harm.

Digicel's obligations and commitment

Digicel is committed to creating a diverse and inclusive work environment that is free of harassment, discrimination, and bullying. The Digicel Anti-Harassment, Bullying, and Discrimination Policy (click [here](#)) provides additional guidance on identifying and reporting harassment, discrimination, and bullying.

Your Role

- **Read, understand, and comply** with Digicel policies and procedures and applicable laws addressing fair and inclusive employment practices.
- **Help create a diverse** and inclusive environment free from harassment, bullying, and discrimination.
- **Do not** engage in harassment, discrimination, or bullying.
- **Speak Up!** about harassment, discrimination, or bullying.

Prohibited Activities (examples)

- Physical or verbal abuse, yelling, screaming, or offensive language;
- Persistent criticism and public humiliation;
- Unwanted sexual advances or abuse, propositions, suggestive notes or e-mails;
- Leering, sexual gestures, or displaying sexually suggestive images;
- Derogatory or obscene comments, jokes, or innuendos; and
- Threatening conduct or retaliation for, among other things, rejecting sexual advances, raising Code of Conduct violations or participating in investigation.

Contact the Group or Local Human Resources Team for guidance.

Safety, Health & Environment (SHE)

Take steps to enable safety and wellbeing within the workplace.

Definitions

Safety, Health and Environment (SHE) efforts are geared towards protecting the safety, health, and wellbeing of our employees, communities, and environment by taking steps to identify and address certain hazards.

Digicel's obligations and commitment

At Digicel, sound safety practices are important in all our workplaces. Digicel is committed to protecting the health and safety of our people and the environment where we operate, which is the responsibility of everyone at Digicel. We are committed to reducing our environmental footprint by reducing our energy use, conserving natural resources, and eliminating waste.

We will comply with applicable environmental, workplace health, and safety laws, standards, and guidelines that apply to our business.

Your Role

- **Read, understand, and comply** with Digicel policies and procedures and applicable laws addressing the safety, health and the environment.
- **Follow** safe operating procedures and work instructions to ensure a safe and healthy workplace and to prevent injuries.
- **Ensure** you take appropriate safety precautions and wear safety gear when participating in certain activities.
- **Do not** create or participate in any activity which poses a hazard to each other's health or safety or threatens the environment.
- **Speak Up!** and report any condition or practice that poses a safety hazard or threatens the environment.

Red Flags or Prohibited Activities



- Failure to obtain or comply with permits;
- Deviations from safe work practices even if deviations have become "routine";
- Lapses in security or emergency preparedness;
- Failure to maintain or provide adequate tools, guarding or protective equipment;
- Unsafe vehicle operation;
- Improperly stored wastes or hazardous materials; and
- Unsafe vendor or customer sites.

Contact the Group or Local Human Resources and/or Facilities Team for guidance.

Human Rights

Promote a culture of respect for human rights.

Definitions

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status.

Digicel's obligations and commitment

We are committed to respecting the human rights of all people affected by our business throughout societies where we operate. We strive to identify, prevent, mitigate, and remedy adverse human rights impacts throughout our workplace, business operations, and in the communities where we work. In addition to identifying and addressing human rights risks associated with our business operations and labor force, we will take steps to identify and address human rights risks associated with our supply chain.

We condemn human trafficking, including all forms of forced labor and child labor. We are committed to attracting and developing a diverse workforce.

We are also committed to complying with the Universal Declaration of Human Rights.

Your Role

- **Read, understand, and comply** with Digicel policies and procedures and applicable laws addressing human rights concerns, including forced labor and modern slavery.
- **Do not engage in practices** that could breach human rights laws.
- **Treat each other with care** and respect regardless of race, sex, nationality, ethnicity, language, religion, or any other status.
- **Ensure the vendors or suppliers** you manage agree to comply with relevant human rights laws, including those that prohibit modern slavery, forced labor, or human trafficking.
- **Pay attention to red flags** that could indicate human rights violations.
- **Speak Up!** if you know or suspect any human rights violations.



Red Flags or Prohibited Activities

- Vendors or suppliers unwilling to agree to comply with human rights laws or regulations;
- Hiring of underaged individuals;
- Restricting employee freedom of movement;
- Retention of employee identification documents such as passports;
- Unfairly and illegally withholding employee wages;
- Differential treatment based on characteristics such as race, ethnicity, gender, sexual orientation, religion, disability, or age; and
- Retaliation against employees that report violations of human rights abuse or illegal or unethical activities.

SECTION 3

Our Commitment to Our Investors, Customers and Partners



Anti-Bribery and Anti-Corruption

Do not engage in or facilitate bribery and corruption.

Definitions

Improper Payment is generally defined as giving or receiving inducements or anything of value for any reason to gain an improper advantage or to influence someone's judgment or authority.

Bribery, a form of Improper Payment, is broadly defined as offering, giving, or accepting anything of value in exchange for an improper advantage.

Corruption refers to the abuse of power or influence for personal gain or other unethical or illegal benefits.

Digicel's obligations and commitment

We are committed to complying with all applicable anti-bribery and anti-corruption laws. We prohibit bribery and improper payments in all business dealings with either government or private sector entities. We will maintain strong controls aimed at preventing and detecting bribery and improper payments and will ensure that our books and records accurately reflect all transactions.

The Digicel Anti-Bribery and Anti-Corruption Policy ("ABC Policy") (click [here](#)) provides additional details for addressing bribery risks, including guidance on pre-approval requirements for receiving or giving business courtesies, sponsorship, and charitable and political contributions, as well as engaging third parties.

Your Role

- **Read, understand, and comply** with Digicel policies and procedures and applicable laws addressing bribery and corruption.
- **Obtain** the requisite pre-approvals prior to offering and receiving business courtesies, sponsorships, charitable donations, and political contribution, as well as engaging third parties.
- **Maintain** accurate, appropriate, and reasonably detailed documentation to support all transactions.
- **Do not** offer, give, accept, or authorize the giving of anything of value in exchange for an improper advantage.
- **Do** ensure interactions with Government Officials accords with ABC Policy's "Guidelines for Interacting with Government Officials".
- **Do not** engage in business with new third parties until they have undergone a compliance due diligence.
- **Recognize and address** "red flags" when engaging third parties to act on Digicel behalf.
- **Speak Up!** if you know or suspect any bribery violations.



Red Flags *(see full list in ABC Policy)*

- The third party has a reputation for unethical or illegal conduct;
- The third party is retained primarily for its connections to government officials;
- Refusal by the third party to execute a written agreement, cooperate with compliance due diligence review, or agree to comply with applicable laws, including anti-bribery laws;
- The third party requests anonymity or insists that their identity remain confidential;
- The third party offers to submit or submits inflated, inaccurate, or suspicious invoices;
- Request by the third party for payments to offshore accounts;
- Hiring or engaging a Government Official (or his/her Family Members) to influence the official's decisions or actions relating to Digicel; and
- Undeclared and unapproved conflict of interest and related party transactions.

Contact the Group Ethics and Compliance Team for guidance.

Antitrust and Competition

Be committed to fair and open competition.

Definitions

Antitrust and Competition laws are designed to preserve and promote fair competition in the marketplace and prevent anti-competitive behaviour by businesses. These laws aim to protect consumers, promote economic efficiency, and maintain a level playing field for businesses by prohibiting practices that hinder competition or harm consumers.

Digicel's obligations and commitment

We are committed to creating an environment in which strict compliance with the antitrust and competition laws is a core corporate mandate. We are therefore committed to engaging in fair and open competition and to prohibiting any conduct that would violate applicable antitrust and competition laws.

The Digicel Antitrust and Competition Law Compliance Policy ("Antitrust Policy") (click [here](#)) provides guidance for identifying and preventing antitrust violations.

Your Role

- **Read, understand, and comply** with Digicel policies and procedures addressing antitrust and competition.
- **Do not** agree, either directly or indirectly, with competitors to:
 - Fix prices or other terms of sale;
 - Coordinate bids or decisions to bid;
 - Allocate customers, territories, or products;
 - Set employee wages or not hire employees;
 - Boycott customers or suppliers;
 - Provide, receive, or exchange competitively sensitive information with a competitor;
 - Engage in contacts of any kind with competitors that could create the appearance of improper agreements; or
 - Otherwise restrain competition.
- **Do not** participate in any forum in which antitrust and competition law violations are taking place. Leave immediately and insist that your departure is noted in the records.
- **Speak Up!** if you know or suspect any antitrust violations.



Red Flags *(see more in Antitrust Policy)*

Agreements with Competitors which:

- Fix prices;
- Limit production, sales or services; and
- Allocate services and customers,

Agreements with Customers as to:

- Price at which they will charge their customers;
- Conditional or bundled discounts; and
- Equally favorable terms as granted to another customer,

Agreements with Suppliers in which:

- Dealing with the supplier is conditional on the understanding that the supplier is not to deal with a competitor of Digicel;
- The supplier is not to offer its products or services to other customers at a lower price; and
- Competitively sensitive information is shared among competing suppliers.

Contact the Group or Local Legal and Regulatory or Group Ethics and Compliance Teams for guidance.

Trade Compliance and Sanctions

Ensure you do business with ethical and compliant parties.

Definitions

Economic Sanctions are the withdrawal or restriction of trade and financial relations with a country, territory, government, group, entity, or individual for foreign-policy purposes.

Trade Sanctions, which is a form of Economic Sanctions, include import and export controls or restrictions on certain goods and services.

U.S., UK, EU, Canada, and other relevant jurisdictions have imposed sanctions on numerous countries, entities, and individuals. These sanctions could impact our ability to conduct business with those sanctioned countries, entities, or individuals.

Digicel's obligations and commitment

We are committed to conducting business in the right way, including complying with applicable Economic and Trade Sanctions. Digicel will not engage in transactions or dealings with individuals, entities, countries, or governments that are subject to applicable Sanctions.

The Digicel Trade Compliance Policy (click [here](#)) provides additional guidance on how to identify red flags of potential sanction violations and steps to take to ensure compliance with applicable sanctions.

Your Role

- **Read, understand, and comply** with applicable laws and Digicel policies and procedures addressing economic and trade sanctions.
- **Ensure compliance due diligence** and sanctions checks are conducted before engaging with or onboarding new suppliers or partners.
- **Do not engage** in any dealings directly or indirectly with individuals or entities within the following countries without written pre-approval from the Chief Compliance and Cybersecurity Officer (CCCO): Afghanistan; Belarus; Burma; Central African Republic; Democratic Republic of the Congo; Iran; Iraq; Lebanon; Libya; Mali; Nicaragua; North Korea; Russia; Somalia; Sudan; South Sudan; Syria; the Kherson, Zaporizhzhia, Donetsk, Luhansk, and Crimea regions of Ukraine; Venezuela; Yemen; and Zimbabwe (as of August 2024). (Click [here](#) for the most recent list).
- **Do not export**, re-export, transfer, or import goods, technology or services to, from, or through a sanctioned country.
- **Do not engage** in any action intended to evade or to cause others to evade relevant sanctions.
- **Speak Up!** if you know or suspect any violations of sanctions or trade control regulations.



Red Flags *(see full list in Trade Compliance Policy)*

- A customer or third party's name appearing on a sanctions list or is owned or controlled by a sanctioned person;
- Any suspected connection to a sanctioned country, including customers, counterparties, intermediaries, or financial institutions located in a sanctioned country;
- Entity or individual based in the following countries: Afghanistan; Belarus; Burma; Central African Republic; Democratic Republic of the Congo; Iran; Iraq; Lebanon; Libya; Mali; Nicaragua; North Korea; Russia; Somalia; Sudan; South Sudan; Syria; the Kherson, Zaporizhzhia, Donetsk, Luhansk, and Crimea regions of Ukraine; Venezuela; Yemen; and Zimbabwe (click [here](#) for the most recent list); and
- A customer or business tries to persuade an employee not to maintain required records or asks to be exempted from reporting or recordkeeping requirements.

Contact the Group Ethics and Compliance Team for guidance.

Conflicts of Interest

Always make business decisions based on what is best for Digicel, never what is best for you personally.

Definitions

A Conflict of Interest may arise when your personal interests, activities, or relationships affect your responsibilities and loyalty to Digicel.

Examples of actual, potential or perceived conflicts of interest include, but are not limited to:

1. Utilizing Digicel's resources or opportunities for personal gain;
2. Directing Digicel's business to close friends or relatives;
3. Serving on Board(s) of competitors, business partners and suppliers;
4. Engaging in outside employment or consulting; and
5. Giving and/or receiving gifts and entertainment to customers or suppliers.

Speak with your Supervisor or the Group Ethics & Compliance Team for confirmation.

Digicel's obligations and commitment

We are committed to implementing the necessary tools and resources to help you identify and prevent possible conflicts of interest.

The Digicel Conflicts of Interest Policy ("CoI Policy") (click [here](#)) provides additional details on how to identify and avoid conflicts of interest and make the necessary disclosures.

Your Role

- **Read, understand, and comply** with applicable laws and Digicel policies and procedures addressing conflicts of interest.
- **Promptly disclose** any actual, potential, or perceived conflict of interest using the Conflicts of Interest Disclosure Form (click [here](#)).
- **Do not engage** in activities prohibited under the CoI Policy.
- **Avoid any activity** which creates the potential perception of a conflict between your personal interests and the interests of Digicel.
- **Speak Up!** if you know or suspect potential conflicts of interest.

Prohibited Activities (*see list in COI Policy*)

- Supervising or being supervised by a family member or a romantic partner;
- Involvement in the hiring, retention, bidding, negotiation, or contract process of a family member, close personal friend, or romantic partner as an employee or supplier;
- Using Digicel's information, property, or resources for personal gain;
- Engaging in any activity that could result in the unauthorised disclosure of Digicel's proprietary information; and
- Competing with Digicel.

Contact the Group Ethics & Compliance Team for guidance.

Anti-Money Laundering

Always know your customer and be alert to possible illegal activity.

Definitions

Money laundering is generally defined as activities designed to conceal or disguise the true origins of criminally derived proceeds so that the proceeds appear to have derived from legitimate origins or constitute legitimate assets.

Digicel's obligations and commitment

Digicel is committed to complying with applicable anti-money laundering laws. We strive to ensure that we earn all our revenues in ethical and legal ways. We will carry out all transactions and financial activities with complete transparency and in line with standard processes. Before entering into business transactions, we will perform due diligence on third parties when required. Moreover, we will report suspicious activities or transactions that could involve money laundering or terrorist financing issues.

Digicel Personnel are prohibited from engaging in or facilitating money laundering.

Your Role

- **Read, understand, and comply** with applicable laws and Digicel policies addressing money laundering.
- **Promptly report** to the CCCO any unusual or suspicious activity which may be indicative of money laundering.
- **Do not** alert third parties of the fact that an incident has been reported or that the matter is under investigation, internally or externally.
- **Do not** accept or transfer money or property used in or derived from the commission of a crime.
- **Ensure adequate information and documentation** are collected from all third parties and corporate customers to comply with Know Your Customer (KYC) requirements and verify the legitimacy of their business activities and sources of funds.
- **Ensure due diligence** checks are conducted before engaging corporate customers and third parties.
- **Speak Up!** if you know or suspect any money laundering violations.



Red Flags or Prohibited Activities

- Customer attempts to provide false information;
- Customer offers to pay cash or overpayments followed by requests for refunds;
- Orders, purchases, or payments that are unusual or inconsistent with a customer's trade or business;
- Unusual fund transfers to or from countries unrelated to the transaction; and
- Transactions that might have been structured to evade recording or reporting requirements.

Contact the Group Ethics and Compliance Team and/or the Group or Local Legal and Regulatory Team for guidance.

Relationship with Third Parties

Work only with third parties that uphold Digicel's values and high integrity standards.

Definitions

Third parties include suppliers, resellers, business partners, customers, and agents, among others.

Third-party management refers to processes whereby a company monitors and manages its interactions with all external parties with whom it has a relationship.

Digicel's obligations and commitment

We are committed to basing relationships with third parties on lawful and fair practices. We aim to only do business with third parties that comply with all applicable legal requirements and Digicel policies.

We safeguard information, including confidential and proprietary information and personal data, of both Digicel and third parties.

Third parties are expected to comply with the Digicel ABC Policy (click [here](#)) and Digicel Trade Compliance Policy (click [here](#)) as well as other applicable policies and laws.

Your Role

- **Read, understand, and comply** with applicable laws and Digicel policies addressing interaction with third parties.
- **Protect Digicel's confidential** and proprietary information including, where appropriate, with a confidentiality agreement.
- **Safeguard any confidential** information or personal data that a third party provides to Digicel.
- **Avoid potential conflicts** of interest when you select a third party.
- **Obtain the necessary approvals** when engaging a third party, particularly business partners and suppliers.
- **Ensure that all interaction** with third parties accords with the ABC, Trade Compliance and Col policies.
- **Be careful not to** create the appearance of impropriety.
- **Speak Up!** if you know or suspect a violation of policies or law by or in respect of third parties.



Red Flags

- Third parties' unwillingness to sign agreements to protect confidential information or intellectual property;
- Provision of vague or incomplete information that cannot be readily verified;
- Unusual payment requests such as split payments, payments to unknown parties, or offshore accounts; and
- Pressure push from third parties to speedily close transaction and bypass proper procedures.

Contact the Group Ethics and Compliance, Group or Local Legal & Regulatory or Procurement Teams for guidance.

SECTION 4

Our Commitment to Safeguarding Information



Use of Company Resources and Assets

Use Digicel's assets and resources to achieve Digicel's business objectives.

Definitions

Company assets and resources refer to the tangible and intangible items that a business owns or controls and uses to conduct its operations and achieve its objectives.

Digicel's obligations and commitment

Digicel is committed to ensuring that its assets and resources are not misused and are dedicated to achieving Digicel's business objectives. Acts of dishonesty against any company within Digicel Group, or its customers, involving theft, destruction, misuse, or misappropriation of property, including money, office equipment, or any other items of value, are prohibited.

The Digicel Acceptable Use Policy (click [here](#)) provides guidance in respect of appropriate usage of Digicel's information processing assets.

Your Role

- **Read, understand and comply** with applicable laws and Digicel policies addressing use of the company's resources and assets.
- **Ensure you utilize Digicel's assets** and resources to achieve Digicel's business objectives.
- **Ensure Digicel's assets and resources** are not used for any unlawful, unethical or inappropriate purposes.
- **Do not use** any of Digicel's electronic communication systems for any of the following purposes:
 - engagement in criminal activity;
 - unauthorised solicitation of money or the operation of a personal business;
 - unauthorised access to any computer system;
 - unauthorised dissemination of documents or other communications outside of Digicel; or
 - intentional or careless dissemination of inaccurate information.
- **Speak Up!** if you know or suspect that company resources or assets are being used for any unlawful, unethical, or inappropriate manner.



Red Flags or Prohibited Activities

- Employees using company resources (such as computers, software, equipment, or vehicles) for personal purposes without permission or outside of company policy;
- Unexplained or disproportionate use of resources, such as unusually high data usage, excessive printing, or frequent use of expensive supplies;
- Intentional damage or neglect of company equipment, vehicles, or facilities;
- Unexplained shortages or discrepancies in inventory or supplies;
- Unauthorised spending, fraudulent expense claims, or misuse of company credit cards for personal expenses; and
- Falsification, alteration, or substitution of records for the purposes of concealing or aiding such acts is also prohibited.

Intellectual Property

Respect and protect intellectual property of Digicel and others.

Definitions

Intellectual Property (IP) refers to original creations of the mind, such as inventions, literary and artistic works, designs, and symbols, names and images used in commerce.

IP protections include patents, trade secrets, trademarks, copyrights and designs, as well as cybersecurity systems and internal requirements to not share IP prior to securing appropriate legal terms.

Digicel's obligations and commitment

We commit to protect our IP and enforce our rights against others who take or use Digicel IP without proper authorization. We respect valid IP rights of others and avoid unauthorised use of IP that belongs to other people or organizations.

Digicel owns the IP created by its employees as part of their employment.

Your Role

- **Read, understand, and comply** with applicable laws and policies addressing intellectual property.
- **Only use** or distribute Digicel's confidential and proprietary information for the benefit of Digicel.
- **Prevent the misuse**, unauthorised disclosure, or unwarranted destruction of information entrusted to you.
- **Do not** bring, access, share, or use a third party's proprietary information, especially from a previous employer, without first consulting Digicel's Legal and Regulatory Team.
- **Comply with** copyright laws, computer software licensing agreements, and relevant Digicel policies.
- **Do not take**, access, provide access to, or use any of Digicel's proprietary information or other IP without authorization after leaving Digicel.
- **Speak Up!** if you know or suspect any IP violations.

Red Flags or Prohibited Activities



- Unauthorised use or reproduction of Digicel's or third parties' IP;
- Use of IP material without giving credit to the creator; and
- Use of company IP for personal projects or financial gain without permission.

Contact the Group or Local Legal and Regulatory Team for guidance.

Confidential Information

Protect confidential information belonging to Digicel or other parties.

Definitions

Confidential Information includes, but is not limited to, proprietary data, trade secrets, product designs, product plans, inventions, strategic plans, pricing information, customer lists, customer data, employee data, financial data, business plans, or other business information.

Digicel's obligations and commitment

We are committed to adequately protecting our confidential information, along with third party confidential information that has been entrusted to Digicel. We have implemented security controls to help secure such information.

Your Role

- **Read, understand, and comply** with applicable laws and policies and procedures addressing confidential information.
- **Respect and maintain** the confidentiality of information gleaned or collected on yourself, Digicel Personnel, and others.
- **Use Digicel's confidential** information for business purposes only and always keep such information in strict confidence.
- **Refrain from sharing** confidential information with other Digicel Personnel unless there is a legitimate need to know for the purpose of their job.
- **Do not disclose** to Digicel Personnel any confidential information belonging to another individual or entity to which you owe an obligation of confidentiality.
- **Do not disclose** any confidential information or trade secret to any person outside Digicel Group nor use any such information for your own or someone else's benefit.
- **Speak Up!** if you know or suspect any confidential information violations.



Red Flags or Prohibited Activities

- Request for confidential information from individuals or sources that seem unusual or unauthorised;
- Leaving confidential documents or information unattended or unsecured;
- Communicating or sharing confidential information over unsecured channels such as public WI-FI or personal email;
- Sharing confidential information with unauthorised individuals or departments; and
- Unauthorised access to information by employees or third parties.

Contact the Group or Local Legal and Regulatory Team or the Group Ethics and Compliance Team for guidance.

Data Privacy

Respect the privacy rights of others.

Definitions

The right to privacy is the fundamental human right of an individual to be let alone and to remain free from undue interference to or intrusion of their privacy, data, home, or family.

Personal data refers to any information about a person whose identity is clear or can be established by obtaining or combining additional information.

Digicel's obligations and commitment

We are committed to complying with applicable laws addressing data privacy and have a legitimate interest in protecting data from unauthorised access or misuse. The Digicel Data Protection Policy (click [here](#)) and supporting guidelines provides guidance regarding handling personal data of our customers, suppliers, employees, workers, and other third parties.

Your Role

- **Read, understand, and comply** with Digicel policies and procedures addressing data privacy and protection.
- **Respect the privacy** rights of other Digicel Personnel, customers, suppliers, and other third parties.
- **Process** (including collecting, storing, using, transferring, etc.) personal data responsibly, and in compliance with applicable laws and data protection principles and guidelines.
- **Appropriately secure** data and systems within your control.
- **Limit access** to data and systems to those with a legitimate business need.
- **Speak Up!** if you know of or suspect any data privacy violations.



Red Flags or Prohibited Activities

- Obtaining and processing personal data without lawful basis;
- Sharing customer or employee data with third party without their consent or a legal basis to do so;
- Direct marketing to customers without opt out requirements or not in accordance with Direct Marketing Guidelines;
- Storing personal data indefinitely; and
- Reusing the personal data for a different purpose without permission.

Report privacy breaches or concerns to the Group Privacy Team at privacy@digicelgroup.com

Cyber Security

Take steps to help prevent and detect cyber security breaches.

Definitions

Cyber Security is the practice of protecting systems, networks and programs from digital attacks and unauthorised access.

Digicel's obligations and commitment

Digicel is committed to complying with applicable cybersecurity laws and has implemented measures to minimize risk by preventing and reducing the impact of security incidents.

The Digicel Information Security Policy (click [here](#)) and the Digicel Cyber Incident Response Plan Policy (click [here](#)) provides guidance in respect of identifying and responding to cyber security issues.

Your Role

- **Read, understand and comply** with Digicel policies and procedures addressing cyber security.
- **Implement appropriate access** and identity controls for systems that hold sensitive information.
- **Create strong passwords** and refrain from reusing or sharing them with others.
- **Maintain a clear desk** and secured screen whenever you are away, and ensure all employees and guests wear and display their identity badges when on Digicel premises.
- **Maintain all sensitive data** held on a portable devices in an encrypted format in the event the device is lost or stolen.
- **Ensure access to emails** or files via mobile phones are enabled using Digicel's mobile device management tool.
- **Report** any suspicious email or communication.
- **Always classify and label** all published documents that contain confidential, sensitive and personal data to ensure readers and recipients know how to correctly treat or handle them.
- **Speak Up!** if you know of or suspect any cyber security breaches.



Red Flags or Prohibited Activities

- Phishing emails requesting sensitive information or prompts to click on suspicious links;
- Connecting to unsecured networks;
- Storing sensitive data on devices without encryption;
- Sharing login credentials with other employees or non-authorized individuals;
- Ignoring security updates for software or operating systems, and not closing critical and high vulnerabilities;
- Sharing sensitive company information on personal social media accounts;
- Releasing unsecured products or services; and
- Using a non Digicel-issued laptop to access company systems or store company information.

Report cyber security breaches or concerns to the Group Cyber Security Team at grpsecurityops@digicelgroup.com

Books, Records & Internal Controls

Be honest, complete and accurate in our accounting, communications and decision-making.

Definitions

Books refer to the systematic records or accounts that document a company's financial transactions, for e.g. ledgers, balance sheets and income statements, invoices, receipts, contracts, etc.

Records includes financial records (like books), operational records, legal documents, correspondence and any other documentation that supports the business activities and decisions of the organization.

Internal Controls are designed to safeguard assets, prevent fraud, and ensure accuracy in financial reporting, for e.g. segregation of duties, authorization and approval processes, reconciliations, and regular audits or reviews.

Digicel's obligations and commitment

Digicel commits to ensuring all assets are protected and properly used and that financial records are accurate and reliable. Digicel's books and records, must be maintained in reasonable detail to clearly and accurately reflect Digicel activities, and to comply with internal control procedures and applicable legal and accounting standards. The Digicel Data Protection Policy (click [here](#)), Information Technology Backup and Data Retention Policy (click [here](#)) and Delegation of Authority Policy (click [here](#)) provide guidance on our internal control procedures.

Your Role

- **Read, understand, and comply** with Digicel policies and procedures addressing accounting and internal controls.
- **Maintain effective processes** and internal controls that fairly reflect transactions or events, as well as prevent or detect inappropriate transactions.
- **Maintain complete, accurate, and timely records** and accounts to appropriately reflect all business transactions and follow company policies in deciding when to retain and dispose of them.
- **Make full, fair, accurate, timely**, and understandable disclosures and communications (to the public and/or regulatory bodies) in compliance with all applicable laws and regulations.
- **Speak Up!** if you know or suspect that any of Digicel's books and records are not being maintained in an accurate and complete manner or in accordance with policies and applicable laws.



Red Flags or Prohibited Activities

- Financial results that seem inconsistent with underlying performance;
- Circumventing review and approval procedures;
- Incomplete or misleading communications about the substance or reporting of a transaction; and
- Large or unusual transactions just before or after a period end date.

Contact the Group or Local Finance and/or Audit Teams for guidance.

Communication with Media and Social Media Use

Be respectful, factual and professional in all communication.

Definitions

Media generally refers to communication channels or platforms used to deliver information, entertainment, news and other content to the public.

Social media refers to internet-based platforms and applications which allow users to create, share and interact with content and each other. Examples of social media include but are not limited to, Facebook, X (formerly Twitter), Instagram, Tik Tok, LinkedIn, Snapchat and WhatsApp.

Digicel's obligations and commitment

As a global communications and entertainment provider, Digicel is committed to maintaining clear, factual, respectful and professional communication in all our business interactions.

Your Role

- **Read, understand, and comply** with Digicel policies and procedures addressing media and social media.
- **Do not disclose** confidential information or issue negative sentiments about Digicel and our customers in your posts or responses/comments.
- **Ensure** all communications with the media and social media posting on behalf of Digicel are passed to and handled by the relevant marketing manager.
- **Avoid** using offensive, discriminatory, or inflammatory language that may reflect poorly on Digicel's reputation.
- **Refrain** from making public statement on behalf of Digicel without proper authorization from the designated spokesperson.



Red Flags or Prohibited Activities

- Sharing false information intentionally;
- Sharing information without verifying its accuracy;
- Incorporating personal opinions with professional communications;
- Responding impulsively or emotionally to criticism or controversy and without going through proper communication channels;
- Posting sensitive or confidential information on social media; and
- Making public statements on behalf of Digicel without authorization.

Contact the Group Communications or Local Marketing Team for guidance.

Thank you for reading Our Code of Conduct, with which you are required to comply at all times.

You will be asked annually to reconfirm your review, understanding and compliance with Our Code of Conduct.

