

MAURITIUS TELECOM GROUP



Code of Conduct

Trust is at the heart of everything we do

Message from our CEO

Dear Colleagues,

Mauritius Telecom endeavours to enrich and better the lives of each and everyone in this digital era. As your CEO, I am committed in leading Mauritius Telecom on a new journey into this era of digitalisation, rethinking of doing business otherwise and above all, in becoming a driving force of the economic growth of the country amidst the world economic challenges.

As we continue to grow in an ever-changing digital environment, the success of our company relies on the trust and confidence of our customers and stakeholders.

At Mauritius Telecom, we live by our values which guide our actions, words, and behaviours in the conduct of our daily business activities.

We place our trust in our employees to fully engage with these values and principles. Trust is at the heart of everything we do and confidentiality of data is of utmost importance. We need to protect the interest and image of the company and refrain from engaging in any kind of activities which may adversely impact the image and reputation of the company.

Our Code of Conduct is a living document to help us do the right thing, act responsibly, and build trust.

Together, we can make it happen!

Yours sincerely

Kapil Reesaul

Chief Executive Officer

Our Values

Our values are the foundation for the company's identity. As an equal opportunity employer, Mauritius Telecom Group is committed to provide employees with safe and healthy work environment.

Our values and the principles underlying our actions are in line with the fundamental principles of human rights.

□ Trust & Integrity

Our business is founded upon trust, honesty and integrity. We work with dedication to build trust and deliver quality products and services to our customers

□ Professionalism

We always use our expertise efficiently and effectively in our dealings with our stakeholders

□ Creativity & Innovation

We bring new products and services to meet and exceed our customer needs and demands in a secure digital environment.

□ Agility

We are committed to develop a culture of agility and speed to effectively meet the evolving needs of customers, employees, and shareholders.

□ Respect & Care

We treat our customers with respect, care and courtesy. We deal with our employees, customers, and suppliers with the highest standards of ethical business practice.



Our Code of Conduct: An Overview

What is the Code?

The Code of Conduct (hereinafter referred to as the “Code”) sets forth Mauritius Telecom Group (hereinafter referred to as “MTG”, “Company”, “Group”) core values, responsibilities, rules, and principles that guide our actions and describes the values and ethical behaviour MTG expects of us in the conduct of our business at work, with colleagues, customers and all stakeholders.

Who must follow this Code?

All employees of MTG at every level including anyone authorized to represent the Company regardless of location or job title.

Is the Code all I must know and comply with?

This Code covers many situations, but unfortunately it cannot address every ethical issue you might face, nor can it cover all laws and policies that apply to MTG’s business. Employees are therefore advised to review MT’s internal policies, procedures, and guidelines to find more information about a particular topic and employees are invited to take the pledge as required.

Many of the policies referred to in our Code of Conduct are available for further consultation online. If you feel there is a conflict between our Code of Conduct and any corporate policies, guidelines, or procedures, kindly contact your head of department.

What else should I know?

The Code does not replace the existing Terms and Conditions of Employment. Employees are expected to abide by the Code and act according to the existing Terms and Conditions of Employment, established procedures, applicable legislations, and relevant rules and regulations.

What we expect from you?

- Read the Code, make sure that you understand it and live by the Code. Complete any training that is assigned to you from time to time and take the applicable pledge.
- Follow it and conduct business in line with the rules set in the Code and in the applicable policies implemented within the company.
- Ask for guidance and assistance, if you have any doubt or are unsure about the most appropriate course of action to take.

Our Actions

All of our dealings are guided by our values.

1

With the Company

- We are dedicated to our Company and strive to succeed together.
- We are reliable and ensure that our Company's interests come first.
- We are disciplined, law abiding, and adhere to values, policies and guidelines.
- We bring value to the Company by being innovative and agile.
- We are always accountable to the Company. We take responsibility for our decisions and actions.

3

With our Customers

- We are professionals, helpful, and walk the extra mile to deliver what is needed from us.
- We are passionate and caring about everything we do and we deliver service with a smile.
- We nurture our relationships and are enthusiastic to learn, innovate, share experiences and improve.
- We are patient, good listeners and ensure that we understand the needs of our customers.
- We are polite and attend to our customers with respect, courtesy, care and agility.

2

With our Colleagues

- We show respect and care to our colleagues.
- We demonstrate the highest level of integrity, trust and honesty.
- We have the resilience to learn, innovate and excel as team members.
- We are responsible for the words we use, our acts, conduct and decisions.
- We are inclusive, value diversity, open to dialogue and accept differences

4

With our Suppliers

- We treat all our contractors, suppliers and service providers fairly, equitably and without discrimination.
- We always adopt best practices, positive business attitude and stay away from corrupt and illicit practices.
- We communicate clearly, deal with and interact professionally and fairly
- We comply with our obligations.
- We ensure confidentiality and security of information. We protect and make optimal use of Company assets.

5

With Stakeholders

We build relationships on trust and make strong and lasting relationships with our stakeholders by being trustworthy.

We communicate and interact with all our stakeholders professionally in the course of business.

The Code: We Act Professionally

Our reputation is vital for our organisation. Professionalism has to do with the way an employee conducts himself or herself in the workplace and also outside the workplace to promote a good image of the MTG through exemplary conduct and discipline.

What is expected from you?

What it means?



Dress for your role

- Wear attire that is appropriate for your role
- Ensure your work clothes or uniform are clean, in good condition, and task appropriate.
- Wear appropriate protective equipment as provided by the Company (if relevant).



Show up on time

- Be punctual at work or any other Company related commitments



Be at work

- Attend work as required and notifying your superior of any absences or lateness as soon as possible.
- Remain at work during office hours unless otherwise required
- Avoid early departure or any other unnecessary absences from scheduled hours



Be Positive & Respectful

- Treat each other with care, kindness, and respect
- Provide a safe and inclusive environment for our customers and colleagues
- Be respectful and courteous to all customers & stakeholders whether on our premises or their premises.
- Greet and interact with everyone in a positive manner.



Show your MT badge

- Always wear the access card.
- Show the access card whenever requested
- Use your access card when entering & leaving the Company premises & ensure no tailgating
- Prevent unauthorised use of your access card



Be Committed & Dedicated

- Demonstrate team spirit and be helpful when required
- Be flexible and prioritize exigencies of work as far as possible
- Show dedication at work & complete all tasks within deadline
- Avoid engaging in any behaviour and/or activity that could cause prejudice to your colleagues and/or the Company in any way whatsoever

The Code: We act with Integrity

At MTG, we strive to do the right thing through the right behaviour in accordance with ethical principles: act in good faith and fairness, demonstrate honesty and transparency, be responsible and accountable for all of our actions.

What is expected from you?	What it means?
 Be Honest, Fair & Transparent	<ul style="list-style-type: none"> ➤ Maintain trust by always being honest ➤ Be open and transparent in dealings with all stakeholders and use your position responsibly ➤ Avoid bias and prejudice ➤ Avoid conflict of interest ➤ Apply independence in judgement and decision making
 Be Accountable	<ul style="list-style-type: none"> ➤ Be accountable for your actions ➤ Accept responsibility for your decisions ➤ Adhere to the principles of good governance
 Say NO to Corruption, Fraud & Bribery	<ul style="list-style-type: none"> ➤ Reject any form of corruption and refrain from any form of favour, bribery or other forms of personal gratuity. ➤ Never give, accept, or promise incentives such as gifts, entertainment, or hospitality in exchange of personal or business advantage. ➤ Never engage in any kind of fraudulent activities, directly or indirectly.
 The Company comes first	<ul style="list-style-type: none"> ➤ Always act in the best interest of our Company. ➤ Avoid any activities that are directly or indirectly in conflict, or in competition with our business. ➤ Always be mindful of the reputation of the company and act accordingly ➤ Be committed to free and fair competition and adhere to competition principles as per legislation in force.
 Obey the law	<ul style="list-style-type: none"> ➤ Comply to all laws, regulations, directives and guidelines governing our business activities at all times

The Code: We act with Care

Employees champion our business, customer needs shape our business model, and our facilities, services and products enable us to achieve our goals and succeed. Together they constitute our real assets, and utmost care is required to preserve the security of the company's confidential information and data.

What is expected from you?	What it means?
 Stay Safe & Treat everyone equally	<ul style="list-style-type: none"> ➤ We are committed to fostering a digital secured environment and a work environment where all employees are treated with decency, respect and dignity. Any kind of harassment or discrimination is not tolerated. ➤ We have at heart your health and safety, and therefore we urge you to comply with our Health and Safety Guidelines as well as applicable laws.
 Protect our Assets	<ul style="list-style-type: none"> ➤ Our assets consist of not only physical assets but also data, technologies, innovations, trademarks, logo, know-how etc. ➤ You have the obligation to protect our company assets from theft, loss, waste, damage, fraud or any other inappropriate use.
 No communication to media/press	<ul style="list-style-type: none"> ➤ Do not communicate to the media /press or third parties except when you have been authorised by management. ➤ Only authorized spokespersons are allowed to discuss on subjects relating to the business with the media or external parties ➤ Care must be taken to ensure that any participation via social media/online accounts do not compromise the interests and reputation of MTG, and your colleagues. ➤ Sharing of company information with third parties and/or on any medium is not allowed. ➤ Sharing of information and personal data relating to your colleagues on any medium is not allowed.
 Keep company affairs confidential	<ul style="list-style-type: none"> ➤ We shall protect information/data from any misuse, violation, loss or theft or being shared with unauthorised third parties. ➤ We protect access to confidential information, and avoid discussing it in common spaces, or with colleagues who don't need to have access. ➤ We do not leave documents containing confidential information in view of third parties
 Keep Data Private	<ul style="list-style-type: none"> ➤ We comply with the Data Protection Act 2017 and any other privacy laws and obligations as applicable. ➤ We treat all data with strictest of confidence and ensure that appropriate security measures are in place to protect customer data and customer information.
 Manage information security Responsibly	<ul style="list-style-type: none"> ➤ Care should be taken when using your work password and email ➤ No sharing of password or unauthorised access to your email ➤ Comply with instructions for security of our Information Systems.

We Pledge

- This document is the MTG Code of Conduct. It is the obligation of each employee to embrace and uphold these standards in the conduct of our duties and in our daily interactions with customers, colleagues, suppliers, stakeholders, competitors and third parties.
- The Code binds all the employees of the Company.
- We are duty bound to report any known violation to this Code of Conduct to the Chief Executive Officer.
- We pledge to uphold the values in the Code of Conduct when handling the business of Mauritius Telecom Group.

The Code in a Nutshell



Professionalism

Do's

- ✓ Dress appropriately and professionally for work
- ✓ Wear uniform and/or protective gear/equipment as provided
- ✓ Be punctual at work
- ✓ Be Courteous & pleasant to colleagues, customers and everybody you meet
- ✓ Enter Company's premises wearing your access card
- ✓ Clock in and clock out your access card each time you enter or leave the office premises
- ✓ Be ready to be a team player
- ✓ Meet all deadlines for your job assignment
- ✓ Make it a habit to be on time for meetings

Don'ts

- ✗ Do not fail to wear protective gear/equipment when required
- ✗ Do not be late for work
- ✗ Do not be disrespectful to colleagues and customers
- ✗ Do not lose or misplace your access card
- ✗ Do not allow tailgating
- ✗ Do not engage in office politics and gossip



Integrity

Do's

- ✓ Promote a non-discrimination and non-harassment workplace
- ✓ Be honest, fair & transparent in all your actions
- ✓ Be accountable for all your actions
- ✓ Respect the right of every employee
- ✓ Your behaviour must be conducive to promote a harmonious and productive atmosphere in the workplace
- ✓ Lead by example and together we succeed
- ✓ Comply to all legislations governing our business activities
- ✓ Always comply with all company related policies, guidelines, and rules

Don'ts

- ✗ Do not criticize others for actions you have taken
- ✗ Do not manipulate others
- ✗ Do not intentionally misrepresent information
- ✗ Do not do anything that may damage the image of the company or cause prejudice to others
- ✗ Do not act immorally or condone immoral act of others
- ✗ Do not discriminate, embarrass or humiliate people who work for and with you
- ✗ Do not indulge in any form of harassment
- ✗ Do not act for selfish gains
- ✗ Do not bully others or rule by intimidation and threats
- ✗ Do not send, transmit or cause to be transmitted anonymous messages, emails or letters on your colleagues
- ✗ Do not make, publish, send or transmit offensive, defamatory, racial, denigrating or harassing comments, message or remarks on your colleagues



Bribery, Fraud and Corruption

Do's

- ✓ Ensure that payment offered to prospective business partners commensurate with the value of services provided.
- ✓ Avoid personal interests which interfere with Company's interest
- ✓ Report suspicious transactions

Don'ts

- ✗ Do not give or accept gift, hospitality or entertainment in return of a business or personal advantage
- ✗ Do not offer, pay, solicit or accept secret commissions or bribe.
- ✗ Do not attempt to dishonestly influence any third parties' decision by offering, promising, or conferring personal advantage or benefit.
- ✗ Do not accept lavish or frequent entertainment with persons with whom the company has official dealings.
- ✗ Do not engage in any kind of fraudulent activities.



Confidentiality

Do's

- ✓ Keep all information received during your course of employment confidential
- ✓ Maintain a 'clean desk policy', ensure that confidential information is not accessible to unauthorised individuals at all times
- ✓ Access to confidential company information should only be provided to employees who require it to perform their work
- ✓ Shred confidential information with care and diligence at time of disposal.

Don'ts

- ✗ Do not disclose or share confidential information relating to the company
- ✗ Do not speak to the media or press except when you are authorized to do so. Only authorized spokespersons are permitted to speak on subjects relating to the business with the media or external parties
- ✗ Do not disclose or share personal information of customers or employees with unauthorized persons both within or outside the organization
- ✗ Do not publish or share in anyway anything related to the company and your colleagues without written permission in public conversations, social media or other forum
- ✗ Do not discard papers containing confidential information in the trash.



Assets and Security

Do's

- ✓ Display your access cards at all times
- ✓ Immediately inform HR in case of loss of Access card
- ✓ Keep company's assets safe and secure
- ✓ Protect the company's financial assets such as cash, bank accounts and ensure adequate procedures are in place to prevent misuse or fraud
- ✓ Use company assets only for business purposes
- ✓ Safeguard your password. Password sharing is prohibited as per our IS Security policy
- ✓ Be vigilant against cyber-attacks including phishing scams and report any incident immediately to IT.
- ✓ Adhere strictly to all instructions issued from time to time by the IT security team

Don'ts

- ✗ Do not use company's assets for personal use
- ✗ Do not resell company's assets
- ✗ Do not allow unauthorised access to your work email and password
- ✗ Do not store your confidential files in unsecured areas
- ✗ Do not open any attachment or emails which appear suspicious.
- ✗ Do not use unlicensed software on computers and devices.



We Succeed Together