



**Airtel Africa plc**  
**Modern slavery policy statement**  
**for the financial year ended 31 March 2025**

**Airtel Africa's modern slavery policy statement overview**

- Airtel Africa's modern slavery policy statement for the financial year ending 31 March 2025 outlines the company's approach to assessing and addressing modern slavery risks in its own operations and supply chain.
- The statement is published by Airtel Africa plc (the 'Company', or the 'Group') and its relevant UK subsidiaries<sup>1</sup> in compliance with the UK Modern Slavery Act 2015.

**Organisational and supply chain structure**

- Airtel Africa plc is a public limited company listed on the London Stock Exchange (LSE) and on the Nigerian stock exchange (NGX) and is a constituent of the FTSE100 Index.
- Airtel Africa operates in 14 sub-Saharan countries<sup>2</sup>, where it's a leading provider of telecommunications and mobile money services. As of 31 March 2025, the Group was either the first or second largest operator in all its markets and served a total of 166.1 million customers<sup>3</sup>.
- Supply chain management is overseen at the Group level by the chief supply chain officer (CSCO), who reports directly to the CEO and is a member of the Executive Committee (ExCo). The CSCO provides updates to the Board of directors – at least annually – and reports regularly to the Audit and Risk Committee (ARC). The CSCO also attends the Sustainability Committee which takes place every two months. This structure ensures alignment with our sustainability strategy and approach to risk management.
- Governance is anchored in a robust suite of policies, including the Code of Conduct, the Code of Business Ethics for partners and suppliers, anti-bribery and corruption (ABAC) policy, human rights policy and modern slavery statement. ESG compliance is monitored through our annual self-assessment questionnaire (SAQ) and third-party audits via our membership of the Joint Alliance for CSR (JAC). By embedding resilience, sustainability and governance into our supply chain strategy, we ensure that our operations – and those of our suppliers – remain future-ready, ethical and sustainable

**Supply chain management**

- Supply chain management is a high priority material topic in Airtel Africa's sustainability strategy which underpins the company's business strategy.

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<sup>1</sup> Airtel Africa plc (number: 11462215) and Airtel Africa Services (UK) Limited (number: 12989750)

<sup>2</sup> Nigeria; the East Africa business region includes Kenya, Malawi, Rwanda, Tanzania, Uganda and Zambia; the Francophone Africa business region includes Chad, the Democratic Republic of the Congo, Gabon, Madagascar, Niger, Republic of the Congo and the Seychelles

<sup>3</sup> Annual Report and Accounts 2025, pages 3--8

- We're continuously reviewing the disclosures that we require of potential vendors throughout the onboarding process and before we award contracts.
- We require all suppliers to include a dedicated human rights clause into the contracts during the onboarding process. This clause outlines clear expectations regarding the respect for – and protection of – human rights across our supply chain, including prohibitions of forced labour, child labour, discrimination and unsafe working conditions. By embedding these standards into our supplier contracts, we ensure that human rights compliance is not optional but a core requirement of doing business with Airtel Africa – reinforcing our zero-tolerance approach to human rights violations.
- We expect all suppliers to meet the standards set out in our Code of Conduct and the Code of Business Ethics for partners and suppliers, and to complete mandatory certifications annually. In addition, as part of our ongoing partners and suppliers' engagement programme (PSEP), we monitor the ESG standards (in accordance with the GRI framework<sup>4</sup>), policies and controls that are in place across our supply chain.
- Our supply chain includes over 2,600 partners and suppliers<sup>5</sup>, with the top 100 accounting for 87.2% of procurement spend, indicative of strategic relationships with key vendors such as original equipment manufacturers (OEMs), telecom infrastructure companies (towercos), IT service partners, handset suppliers, logistics firms and regional commercial distributors.
- Local sourcing is prioritised, with approximately 70% of suppliers based in operating countries (OpCos), reflecting a strong focus on empowering national economies, supporting job creation and achieving inclusive growth while also reducing environmental footprint through shorter supply chains.
- Sourcing is strictly governed by a robust due diligence and compliance framework: we're working to align all suppliers with Airtel Africa's Code of Business Ethics, contractually committing to anti-bribery, human rights and ESG (environmental, social, governance) policies, including annual recertification for major suppliers, and complete comprehensive onboarding procedures. Ongoing ESG risk screening, periodic supplier audits (internal and through the Joint Alliance for CSR (JAC)), and an annual self-assessment questionnaire ensure high standards are maintained. Internal controls and oversight are provided by Group-level supply chain governance, with the CSCO reporting regularly to the quarterly Board and regular Sustainability Committee meetings.
- The Global Reporting Initiative (GRI) disclosures: the Sustainability Report 2025 covers the reporting period from 1 April 2024 to 31 March 2025. It was prepared in accordance with the 2021 GRI Standards. Covering Airtel Africa's operations across its 14 markets, it includes disclosures on two relevant standards:

<b>GRI 408: Child labour 2016</b>	408-1 Operations and suppliers at significant risk for incidents of child labour	There are no confirmed significant risks or incidents of child labour during the reporting period
<b>GRI 409: Forced or compulsory labour 2016</b>	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	There are no confirmed significant risks or incidents of forced or compulsory labour during the reporting period

<sup>4</sup> GRI 408-1 Operations and suppliers at significant risk for incidents of child labour; GRI 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour

<sup>5</sup> Annual Report and Accounts 2025, page 124

- We've also adopted the Global System for Mobile Communications Association's (GSMA) 'ESG metrics for the mobile industry' which includes 'GSMA-SUP-01 Sustainable procurement policy' metric. Therefore, our sustainable procurement policy includes human rights and labour principles.<sup>6</sup>

### **Labour supply chain structure**

- Airtel Africa's organisational structure balances centralised strategic oversight with decentralised operations, with Group-level policy and local OpCo execution.
- We are committed to building an inclusive workplace, upholding ethical labour practices and prioritising employee health and safety<sup>7</sup>. This includes upholding human rights and denouncing slavery, child labour, forced labour, inhuman treatment or dangerous or inhumane working conditions.
- We adhere to the labour laws in the countries where we operate.
- Alignment with our Code of Conduct, including our stance on diversity and inclusion, non-discrimination, freedom of association and collective bargaining with zero tolerance to child or forced labour, is a fundamental requirement for all our contracts.

### **Main products and services**

- Airtel Africa provides telecommunications and digital financial services, including mobile voice and data connectivity, mobile money, broadband services and digital solutions in areas such as recharges and apps.
- The Group's business comprises three elements: voice, data and mobile money (Airtel Money). Within the Group, the mobile voice business comprises pre-paid and post-paid wireless services, international roaming services and fixed-line telephone services. The mobile data business offers 2G/4G and 5G services. Both the voice and data services are delivered by several direct and indirect subsidiaries. As part of the mobile money business, the Group, in partnership with local financial institutions, provides mobile commerce services that enable customers, among other services, to send and receive money, make payments for utility bills and deposit money through linked bank accounts (in certain countries).
- The Group owns and leases extensive tower infrastructure and fibre cables across its territories and continues to develop, maintain and operate its equipment on leased towers. In addition, the Group includes a subsidiary submarine cable company through which the Group has access to submarine cables in the Republic of Congo and Tanzania to support the provision of international voice and data services.

### **Sectoral operations**

- Airtel Africa operates in telecommunications and mobile financial services. We report mobile services' performance across all our markets and within three operating regions. We also report mobile money performance as a separate segment. The Group's operating segments are as follows:

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<sup>6</sup> For more information, see our 'Code of Business Ethics for partners and suppliers' published on [www.airtel.africa](http://www.airtel.africa)

<sup>7</sup> For our sustainability strategy, see the Sustainability Report 2025, page 24

- **Nigeria mobile services** – comprising of mobile service operations in Nigeria
- **East Africa mobile services** – comprising of mobile service operations in Kenya, Malawi, Rwanda, Tanzania, Uganda and Zambia
- **Francophone Africa mobile services** – comprising of mobile service operations in Chad, the Democratic Republic of the Congo, Gabon, Madagascar, Niger, Republic of the Congo and the Seychelles
- **Mobile money** – comprising of mobile money services across the Group

These operating segments are supported by Group entities in the UK, Netherlands, Mauritius, India and Dubai.

### Supplier network

- Our supplier network is extensive, with a focus on local suppliers and strategic partnerships with multinational OEMs and telecom infrastructure companies.
- Indirect suppliers and subcontractors play critical roles in technical support, logistics and energy management.

### Governance structure and modern slavery risk management

- Airtel Africa's governance structure for modern slavery risk management includes Board accountability, committee oversight and executive ownership. It ensures senior level oversight and effective management of modern slavery risks, integrating responsibilities across the Board, committees, executive leadership and operational management.
- Responsibility for modern slavery risk management is integrated across governance, management and operational structures, with the Board of directors overseeing sustainability strategy, ESG risk management, and policy approval, including modern slavery and human rights.
- The Audit and Risk Committee and Sustainability Committee support the Board in overseeing sustainability strategy and risk management. The Board oversees sustainability strategy and risk management, supported by the Audit and Risk Committee which handles compliance and internal controls, including human rights and modern slavery. It monitors whistleblowing, supervises the Code of Conduct and receives quarterly updates on incidents. The chief supply chain officer (CSCO) manages supply chain operations, ensuring due diligence, contract execution and ESG compliance and reports to the CEO. The Audit and Risk Committee ensures timely remediation of breaches through regular reporting.
- The Sustainability Committee, led by the CEO, reviews progress, recommends policy updates and oversees the sustainability strategy, including human rights and modern slavery. It includes senior leadership from various functions and meets regularly to ensure objectives are met. The committee reports to the Audit and Risk Committee and escalates risks to the Board.
- Operational accountability is defined among executive roles, with specific responsibilities for the CEO, head of sustainability, chief compliance officer (CCO) and CSCO.
- The head of sustainability ensures the implementation the sustainability strategy, including human rights and supply chain management. Reporting to the CEO, he integrates modern slavery controls, oversees training, leads data collection and reports progress to committees and the Board.
- The CCO embeds a culture of compliance, oversees policy implementation and ensures grievance mechanisms function effectively.

- Policy development and review fall under functional leaders, with the Board and Sustainability Committee approving policies and reassessing them annually to meet evolving expectations.
- The Board of directors holds ultimate accountability for modern slavery risk management, promoting sustainable business success, setting company culture, approving strategy and policies and monitoring progress. It receives quarterly updates on sustainability strategy, including modern slavery risk management. The Board also receives quarterly updates, reviews progress and approves key policies such as the modern slavery policy statement and the human rights policy.
- Strategy implementation is cascaded through the Executive Committee (ExCo), responsible for deploying the sustainability strategy across markets. Local companies manage risks at a regional level, escalating them to Group functions and Board committees.
- Performance against non-financial KPIs, including human rights and modern slavery, is monitored, with executive remuneration linked to ESG targets. Remuneration includes malus and clawback clauses for non-compliance, reinforcing accountability.

### **Information gathering and stakeholder engagement**

- Airtel Africa employs a structured approach to information gathering for compliance, involving materiality assessments and stakeholder engagement.
- Stakeholder mapping is conducted using frameworks such as the AA1000 Stakeholder Engagement Standard, and the most impacted or influential stakeholders – customers, employees, suppliers, governments and regulators, shareholders, NGOs and the media – are prioritised for engagement. Consultation occurs through surveys, focus groups, town halls (at both Group and OpCo level), direct meetings, governance events, industry roundtables, site visits and formal regulatory processes. This engagement is not limited to data collection: it is embedded in the development and review of policies, the formulation of strategic priorities and the shaping of annual and sustainability report content.
- Stakeholders and external consultation also precede any joint or collaborative statements. Before joining industry's initiatives or making public commitments (such as memberships with the GSMA, the United Nations Global Compact (UNGC) and the Joint Alliance for CSR (JAC)), Airtel Africa seeks engagement through working groups, audits, industry roundtables and feedback sessions. These interactions inform both the content and the focus of joint statements, allowing the company to ensure its positions reflect both emerging best practice and the needs and expectations of key external stakeholders.

### **Continuous improvement**

- Airtel Africa's approach to modern slavery risk assessment and management is dynamic, with ongoing updates and improvements based on stakeholder input and industry best practices.
- To support ongoing improvement and transparency, the governance structure includes regular stakeholder engagement via market visits, annual ESG roundtables, and direct consultations that inform policy development and ensure feedback loops with affected communities and key actors in the value chain. Internal and third-party assurance (including participation in sector initiatives) test controls and validate compliance with anti-slavery requirements and broader sustainability standards.

## Policies addressing slavery and human trafficking

- The Company is a signatory to the United Nations Global Compact (UNGC) and is wholly committed to meeting its fundamental responsibilities in the four key areas: human rights, labour, environment and anti-corruption. Our CEO reaffirms our continued support to the Ten Principles of UNGC annually.
- Additionally, our sustainability strategy, published in October 2021, is aligned with six of the United Nations Sustainable Development Goals (UN SDGs) and supported by goals and active policies to respect human rights, drive positive social impacts, protect the natural environment and conserve resources.
- Ethical behaviour is vital in the Group's operations and conducting business responsibly with regard to our customers and partners is fundamentally important to all Group companies. Our 'AIR' values – Alive, Inclusive and Respectful – describe how we intend to get there.
- The Company's Code of Conduct underpins everything we do. Our modern slavery policy statement is contained within the Code of Conduct and published as a standalone document on [www.airtel.africa](http://www.airtel.africa); it states that the Company conducts its business in a way which respects human rights. The Company denounces holding another person in slavery, child labour, forced labour, inhumane treatment or working conditions that are a threat to life or hinders physical, emotional and mental wellbeing of a person.
- The Code of Conduct has been adopted by all companies within Airtel Africa plc: it applies to all the Group's workforce (whether permanent or temporary as well as Board members).
- The Code of Conduct sets out ethical practices expected from employees, including policy provisions regarding modern slavery. Everyone who works for Airtel Africa is required to report suspected breaches of the Code of Conduct, including via the Airtel Africa anonymous and confidential whistleblowing/ hotline reporting service<sup>8</sup>. These online and phone reporting hotlines are available in official languages and every report is assessed and investigated.
- As outlined in the Code of Conduct, we demand the same high standards from our business partners and evaluate whether a prospective partner's values align with our own before making contractor and supplier decisions. We have a zero-tolerance approach towards modern slavery, human trafficking, forced labour and child labour. This is also outlined in our Code of Business Ethics for partners and suppliers which is published on [www.airtel.africa](http://www.airtel.africa)
- Airtel Africa's policies prohibiting modern slavery and ensuring compliance with human rights standards, include:

Policy	Scope	Critical areas of focus	Responsibility
Code of Conduct	Sets out the standards we expect from our stakeholders, including	Diversity and inclusion, non-discrimination, freedom of association and collective bargaining	Chief compliance officer

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<sup>8</sup> Further details of our whistleblowing policy can be found in our Annual Report and Accounts 2025 and on [www.airtel.africa](http://www.airtel.africa)

	employees and suppliers	with zero tolerance to child or forced labour	
Human rights policy	Our commitment to observing, protecting and promoting human rights	Discrimination and harassment prevention, inclusivity, workplace safety, freedom of association, freedom of expression, fair and equitable compensation, forced labour prohibition and opposition to the exploitation of children	Chief compliance officer
Code of Business Ethics for partners and suppliers	The standards we require of our partners and suppliers to maintain a productive, ethical and responsible partnership	Legislation, ethical conduct, anti-corruption and bribery, intellectual property, fair business practice, labour and human rights, prohibition of child and forced labour, discrimination, health and safety, electromagnetic field (EMF) safety, fair remuneration, living and working conditions, working hours, freedom of association, responsible sourcing, environmental responsibility, data privacy and information security, tax evasion, and sanctions and trade control	Chief compliance officer
Whistleblowing policy	Upholding high standards of transparency and integrity	Workplace and sexual harassment, health and safety concerns, unethical business practice and conflict of interest	Chief compliance officer
Community grievance mechanism	The processes to capture, assess and respond to any community concerns arising from our operations	Managing complaints and grievances, enhancing conflict resolution, transparency and accountability, and emerging environmental and social grievances in project areas	Head, corporate communications and CSR

Stakeholder engagement policy	Ensuring we understand stakeholder views and expectations	Community development plans and goals, partnerships, environmental and social impact and anti-discrimination	Group company secretary
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The company engages with stakeholders, including suppliers, trade unions and NGOs to develop and implement modern slavery policies<sup>9</sup>.

### Communication and enforcement

- Airtel Africa communicates and enforces policies through governance structures, mandatory training and supplier engagement.
- Supplier compliance is enforced via contractual obligations, audits and regular engagement initiatives.

### Human rights due diligence

- Airtel Africa's human rights due diligence approach is integrated into its sustainability strategy, with policies aligned to international standards and ongoing monitoring.
- Due to the nature of our business, we consider that the business of the company carries a low risk of modern slavery occurring in our supply chain. In our Sustainability Report 2024, we published the results of the double materiality assessment which was conducted earlier in the year. Our supply chain was identified as one of the high impact material topics so we'll continue to develop dedicated programmes to increase supplier disclosures and monitor their environmental, social and governance (ESG) performance with a particular focus on the top 100 suppliers and any new suppliers who may operate in or be exposed to locations, industries or activities with a history of poor labour standards.
- During the reporting period ended 31 March 2025, we continued to integrate human rights due diligence into our supplier assessment as outlined in the Annual Report and Accounts 2025. In 2024, as part of our sustainability strategy, we carried out, for the second year, our annual ESG due diligence assessment of 100 top vendors and suppliers, which account for over 87% of overall procurement activities: our suppliers were required to complete the survey and include an evaluation of their respective policies and protocols which explicitly prohibit any form of child labour, human trafficking, forced labour and modern slavery. Additionally, each year we require that vendors certify to us their compliance with our Code of Conduct in which they undertake that they have not and do not engage in any form of modern slavery, including child labour or forced labour in our supply chain.
- During the registration process of new suppliers, the Group also conducts screening for new partners against databases for sanctions, anti-bribery and corruption, politically exposed persons and adverse media reports, including reports of possible modern slavery violations. The Group has contracted the services of a third-party provider for the screening database ensuring the information is constantly being updated.

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<sup>9</sup> For more information, see Annual Report and Account 2025, stakeholder engagement: 'Our people' (page 119)



- If the effectiveness of our measures is called into question, or our periodic reviews of our compliance indicate any areas for improvement, we will make such changes to our policies, practices and procedures as may be required from time to time.
- We review the Code of Conduct certifications, ensuring partners follow our standards, assess and change the supplier onboarding processes as well as review and amend contractual terms as necessary.
- We conduct a further assessment of the Group's exposure to potential wrongdoings across our operating business and supply chain. This analysis is informed by:
  - the risk profile of individual countries based on the Global Slavery Index (GSI)
  - the extent to which specific demographic groups or types of employees or contractors may be more vulnerable than others for cultural, economic or operational reasons
  - the disclosures of peer companies and vendors
  - the insights of labour and human rights groups and other stakeholders with specialist expertise in this area.

This analysis, in turn, determines the required programmes and associated compliance mechanisms.

### **Grievance mechanisms**

- Airtel Africa provides grievance mechanisms, including anonymous whistleblowing services and trade union engagement, to report concerns and access remedies.

### **Remediation policies and processes**

- The company has established remediation mechanisms, including a community grievance mechanism and whistleblowing process, to address grievances and ensure compliance with human rights standards.

### **Training and capacity building**

- Airtel Africa provides training on modern slavery risks to employees and suppliers, with a focus on awareness and compliance. Training in modern slavery and human rights is mandatory and recurring for all employees, with annual refresher requirements and onboarding protocols for new hires. Suppliers also receive guidance and updates to reinforce expectations. Compliance is further driven through robust monitoring frameworks: a suite of key performance indicators tracks deployment of onboarding processes, ESG audit results, supplier certification and the reporting/remediation of any breaches, with progress metrics forming part of executive performance and remuneration

### **Evaluating our progress**

- During financial year 2024/25, we conducted an ESG self-assessment questionnaire (SAQ) amongst 100 of our top suppliers by spend and received a 75% completion rate. Several survey questions focused on human rights protection. The results revealed that 96% (2024: 95%) of respondents had a written policy or statement in place that explicitly prohibited child labour, human trafficking, forced labour and modern slavery.
- Our internal audit and assurance team assesses compliance with all internal policies and regulatory obligations and is carried out in partnership with auditors from EY's internal audit services.

- Additionally, we are a member of the Joint Alliance for CSR (JAC) which represents telecommunications service providers with shared vendors to the ICT industry. Four Airtel Africa supplier site audits were completed by JAC members during the reporting period.
- During the reporting period, we investigated 73 (2024: 67) incidents received through various touchpoints and our formal whistleblowing channels, none of which concerned violations of human rights. These incidents were of varying magnitude, with only a couple meeting the threshold for reporting to the Audit and Risk Committee (ARC). The ARC reviews and approves the mitigating actions. The very small number of reports that contained allegations of a breach of our Code of Conduct were thoroughly investigated and disciplinary action was taken where appropriate.

### **Reporting concerns and next steps**

- Employees are encouraged to report concerns through management or the independent whistleblowing helpline. As with all incident reporting, individuals who raise concerns on modern slavery in good faith can do so without fear of retaliation.
- Airtel Africa's whistleblowing mechanism is independently managed, allows confidential and anonymous reporting by employees, suppliers, and external partners. All reports are formally investigated, with ARC and the Board receiving regular summaries, and the Ethics Committee involved in serious or strategic cases. The effectiveness and use of this mechanism are monitored regularly
- The company plans to review and update supplier contracting terms by 31 March 2026 to respond to modern slavery concerns.

### **Board approval**

- The modern slavery policy statement was approved by the Board of directors on 23 July 2025.

Signed on behalf of the Board of directors of Airtel Africa plc by Sunil Taldar, chief executive officer, on 30 September 2025.

*Sunil Taldar*

**Sunil Taldar**  
CEO  
Airtel Africa plc