



Airtel Africa plc
Modern slavery policy statement
for the financial year ended 31 March 2026

Airtel Africa's modern slavery policy statement overview

- Airtel Africa's modern slavery policy statement for the financial year ending 31 March 2026 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 subsidiary, Airtel Africa Services (UK) Limited under company number 12989750, in compliance with the UK Modern Slavery Act 2015. Airtel Africa plc is registered in England and Wales under company number 11462215.
- Modern slavery is used in this statement to include slavery, servitude, forced or compulsory labour and human trafficking. Our approach is risk-based and focuses on risk to people rather than only legal, financial or reputational risk to the Group.

About Airtel Africa

- 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 FTSE 100 Index.
- Airtel Africa operates in 14 sub-Saharan countries¹, where it is a leading provider of telecommunications and mobile money services for consumers and enterprises across three regions: Nigeria, East Africa and Francophone Africa. As of 31 March 2026, the Group was either the first or second largest operator in all its markets and served a total of 183.5 million customers².

Airtel Africa's operations

- Airtel Africa operates and reports 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:
 - **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, the Netherlands, Mauritius, India and the UAE (Dubai).

¹ 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

² Annual Report and Accounts 2026, pages 3-4

Main products and services

- Airtel Africa provides telecommunications and digital financial services, including mobile voice and data services and mobile money services, nationally and internationally. The Group's business comprises voice, data and mobile money. Mobile voice services include prepaid and postpaid wireless services, international roaming and fixed-line telephone services. Mobile data services include 2G, 4G and 5G services. Through Airtel Money and in partnership with local financial institutions, the Group provides mobile commerce services that enable customers to send and receive money, make payments for utility bills and, in certain countries, deposit money through linked bank accounts.
- The Group owns and leases extensive tower infrastructure and fibre-optic cables across its geographical footprint and continues to develop, maintain and operate equipment on leased towers. The Group also includes a subsidiary submarine cable company through which it has access to submarine cables in the Republic of Congo and Tanzania to support international voice and data services.
- For the purpose of assessing modern slavery risk, the Group considers both its direct operations and relevant downstream relationships, including strategic partnerships, franchise and distributor arrangements and operations. The specific risk assessments and controls applying to these activities are described under 'Modern slavery risk assessment'.

Supplier network

- Our supplier network is extensive, with a focus on local suppliers and strategic partnerships with multinational OEMs and telecom infrastructure companies.
- We are committed to creating long-term, inclusive economic value across our markets. In 2025/26, 65% of our procurement spend went to local suppliers – continuing our strong focus on empowering local businesses, supporting job creation and strengthening national economies.
- Indirect suppliers and subcontractors play critical roles in technical support, logistics and energy management.
- As of 31 March 2026, our supply chain included over 2,700 partners and suppliers, with the top 100 accounting for 85.6% of procurement spend. Key supplier categories include OEMs, telecommunications infrastructure companies, tower companies (towercos), IT service partners, handset suppliers, logistics firms and regional commercial distributors. At least 90% of suppliers are based in operating countries, reflecting a focus on national economies, job creation and inclusive growth while reducing environmental impact through shorter supply chains³.
- Our visibility is greatest for directly contracted suppliers and, specifically, the top 100 suppliers by procurement spend. During 2025/26, the annual ESG self-assessment and supplier audit activity improved our understanding of the policies, controls and practices of participating suppliers. However, visibility below top tier, including some subcontractors, remains more limited.

Supply chain governance structure

- Airtel Africa's organisational structure balances centralised strategic oversight with decentralised operations under the Group-level policy and local operating company (OpCo) execution.
- 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

³ For more information about how we engage with our partners and suppliers, see Annual Report 2026, page 109

Committee (ExCo). The CSCO provides updates to the Board at least annually and reports regularly to the Audit and Risk Committee (ARC).

- Governance is anchored in a suite of policies, including the Code of Conduct, the Code of Business Ethics for partners and suppliers, the anti-bribery and corruption (ABAC) policy and the human rights policy⁴.
- Supply chain ESG risk compliance is monitored through the annual ESG self-assessment questionnaire (SAQ) and third-party audits through membership of the Joint Alliance for CSR (JAC)⁵.

Governance structure and modern slavery risk management

- Airtel Africa's governance structure for modern slavery risk management includes Board accountability, the Audit and Risk Committee (ARC) and Sustainability Committee oversight, executive ownership and operational implementation. Responsibility is integrated across governance, management and operational structures, with the Board overseeing sustainability strategy, ESG risk management and relevant policy approval.
- The ARC supports the Board in overseeing compliance and internal controls, including human rights and modern slavery. It monitors whistleblowing and the Code of Conduct and receives updates on incidents.
- The Sustainability Committee, chaired by the CEO, with the CFO as a member, reviews progress, recommends policy updates and oversees the sustainability strategy, including human rights and modern slavery. The committee reports to the ARC and escalates risks to the Board⁶.
- The chief supply chain officer (CSCO) manages supply chain operations, due diligence, contract execution and ESG risk compliance and reports to the CEO.
- The chief compliance and risk officer (COO) embeds a culture of compliance, oversees policy implementation and supports effective grievance mechanisms. The CCO also manages third party risks, including modern slavery risks, as part of the Group third party risk management framework.
- Operating companies (OpCos) manage risks locally and escalate them to Group functions and Board committees where appropriate.
- The head of sustainability ensures the implementation the sustainability strategy, including human rights and supply chain management. Reporting to the CEO, he coordinates implementation of sustainability strategy across 14 OpCos.
- Modern slavery risk assessment is carried out in line with the Group's third-party risk management processes. This includes third party due diligence at onboarding and ongoing thematic reviews from time to time. Escalation of key risk matters is done to the Executive Risk Committee (ERC) and the ARC as per the Group' risk governance structure/framework.

Supply chain management system

- Supply chain management is a high-priority material topic in Airtel Africa's sustainability strategy which underpins the company's business strategy. We review disclosures required from potential vendors during onboarding and before contracts are awarded.
- Our general terms include standard contractual clauses prohibiting modern slavery in all contractual arrangements with third parties. They set expectations on protecting human rights across our supply chain, including prohibitions on forced labour, child labour,

⁴ These policies are available on our corporate website www.airtel.africa

⁵ For more information, see Sustainability Report 2026, pages 49-52

⁶ For more information about our governance structure, see www.airtel.africa

discrimination and unsafe working conditions. These requirements reinforce our zero-tolerance approach to human rights violations.

- We expect suppliers to meet the standards in our Code of Conduct and Code of Business Ethics for partners and suppliers and to complete required annual self-certifications pursuant Code of Conduct and the Code of Business Ethics for partners and suppliers which explicitly prohibits all forms of modern slavery in our business dealings.
- Through our partners and suppliers' engagement programme (PSEP), we monitor ESG standards, policies and controls across our supply chain, including those relevant to GRI 408-1 on child labour and GRI 409-1 on forced or compulsory labour.
- Sourcing is governed by a due diligence and compliance framework. Suppliers must comply with the Code of Business Ethics for partners and suppliers and contractually commit to anti-bribery, human rights and other ESG policies. Ongoing due diligence screening, supplier audits and the annual SAQ support maintenance of these standards.
- The Group reports on implementation of its sustainability strategy in accordance with the Global Reporting Initiative (GRI). The Sustainability Report 2026 covers 1 April 2025 to 31 March 2026. Under GRI 408-1 and GRI 409-1, no suppliers were identified as presenting a significant risk of child labour or forced or compulsory labour during 2025/26.
- We have also adopted GSMA's ESG metrics for the mobile industry, including GSMA-SUP-01 on sustainable procurement policy. Our sustainable procurement policy therefore includes human rights and labour principles.

Policies and fundamental principles

- Airtel Africa 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.
- Our sustainability strategy, published in October 2021, is aligned with six of the United Nations Sustainable Development Goals (UN SDGs)⁷ and supported by goals and active policies to respect human rights, drive positive social impacts, protect the natural environment and conserve resources.
- Our AIR values – Alive, Inclusive and Respectful – describe how we work. Our Code of Conduct states that Airtel Africa conducts business in a way that respects human rights and applies to the Group's permanent and temporary workforce and Board members. Everyone who works for Airtel Africa is required to report suspected breaches, including through the anonymous and confidential whistleblowing hotline.
- We demand high standards from business partners and assess the alignment of prospective partners' values with our own. We have zero tolerance for modern slavery, human trafficking, forced labour and child labour. This is also set out in our Code of Business Ethics for partners and suppliers.
- Airtel Africa's policies prohibiting modern slavery and ensuring compliance with human rights standards are publicly available on www.airtel.africa and include:

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

⁷ Sustainability Report 2026, page 33

Policy	Scope	Critical areas of focus	Responsibility
	stakeholders, including employees and suppliers	bargaining 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, chief supply chain 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

Communication and enforcement

- Airtel Africa communicates and enforces policies through governance structures, mandatory training and ongoing supplier engagement.
- Supplier compliance is enforced via contractual obligations, audits and regular engagement initiatives.
- Relevant policy changes are communicated through our website www.airtel.africa and to suppliers through onboarding process, contract documentation, regular meetings and various engagement events. Policies and communication channels are available on our website www.airtel.africa supporting access by employees, suppliers and local communities.

Information gathering and stakeholder engagement

- Airtel Africa uses a structured approach to information gathering, including materiality assessment and stakeholder engagement. Stakeholder mapping uses frameworks such as the AA1000 Stakeholder Engagement Standard. Customers, employees, suppliers, governments and regulators, shareholders, NGOs and the media are prioritised according to impact and influence.
- Engagement includes surveys, focus groups, town halls, direct meetings, governance events, industry roundtables, site visits and formal regulatory processes. Engagement informs policy development and review, strategic priorities and annual and sustainability reporting.
- Before joining industry, initiatives or making public commitments, including through the GSMA, UNGC and JAC, Airtel Africa engages through working groups, audits, industry roundtables and feedback sessions. These interactions inform the content and focus of joint statements and help the Group consider emerging practice and stakeholder expectations.

Modern slavery risk assessment

- Airtel Africa's human rights due diligence approach is integrated into our sustainability strategy, with policies aligned to international standards and ongoing monitoring. Given the nature of the Group's business, we consider the overall risk of modern slavery occurring in our directly contracted supply chain to be low. The 2026 double materiality assessment nevertheless identified supply chain management as a high impact material topic, and we continue to develop programmes to increase supplier disclosure and monitor ESG performance.
- In 2025/26, the Group carried out an annual ESG due diligence assessment of 100 top vendors and suppliers, representing more than 85.6% of procurement activity. Suppliers were required to complete the ESG SAQ and describe policies and controls prohibiting child labour, human trafficking, forced labour and modern slavery. Vendors also certify compliance with applicable ethical requirements.
- During registration, new suppliers are screened using a third-party database for sanctions, anti-bribery and corruption, politically exposed persons and adverse media, including reports of possible modern slavery violations. The database is updated by the third-party provider.
- The Group's assessment is also informed by country risk profiles using the Global Slavery Index, potentially vulnerable demographic groups or worker types, peer and vendor disclosures, and insights from labour and human rights groups and other stakeholders with relevant expertise. The analysis informs programmes and compliance mechanisms.

Human rights due diligence

- If periodic review indicates areas for improvement, the Group makes changes to policies, practices and procedures as required. We review supplier certifications, supplier onboarding and contractual terms. Supplier compliance is monitored through screening, ESG SAQs, engagement and audits.
- Our due diligence process comprises:
 - a) identifying and assessing actual and potential impacts
 - b) integrating findings into supplier selection, contracting and management
 - c) tracking actions and outcomes
 - d) communicating performance
 - e) supporting remediation where the Group has caused or contributed to an impact.

Where the Group is directly linked to an impact through a business relationship, it will seek to use its leverage to prevent or mitigate the impact.

Prevention, mitigation and supplier engagement

- The Group's preventive measures include Code of Business Ethics for partners and suppliers as well as contractual clauses, screening, including media channels, annual certification, ESG SAQ, ongoing supplier engagement, internal and JAC audits, monitoring of grievances and corrective actions where deficiencies are identified.
- Beyond contractual compliance, the Group engaged suppliers during 2025/26 through partners and suppliers' engagement programme (PSEP), ESG roundtable, various industry events, ESG SAQ follow-up, audit remediation and specific sessions focused on renewable energy. These activities addressed human rights, anti-bribery and corruption, operational supply chain risks and general ESG risks associated with our value chain. This resulted in better understanding of our value chain and its challenges, including a more thoughtful approach to the risk themes to be covered during our ongoing engagement programme in 2026/27. Where disengagement is considered, the Group seeks to assess potential impacts on affected workers and seeks to avoid abrupt termination that could increase harm, using corrective action and responsible exit measures where appropriate.

Airtel Africa's Code of Conduct

- We are committed to building an inclusive workplace, upholding ethical labour practices and prioritising employee health and safety. This includes upholding human rights and denouncing slavery, child labour, forced labour, inhuman treatment and dangerous or inhumane working conditions. We adhere to labour laws in the countries where we operate.
- Alignment with our Code of Conduct, including our approach to diversity and inclusion, non-discrimination, freedom of association and collective bargaining, and zero tolerance of child or forced labour, is a fundamental requirement for our contracts.
- The Group uses employees, contractors and labour supplied through third parties across its operations. Our understanding of recruitment channels, migrant worker source and the role of labour agents or brokers is aligned with local labour regulations. We engage only with registered vendors who comply with laws in their respective jurisdictions.

Grievance mechanisms

- All operations are supported by established grievance mechanisms intended to address concerns and support compliance with human rights standards. Local communities are engaged across the 14 operating companies under the stakeholder engagement policy.

- Employees are encouraged to report concerns through management or the independent whistleblowing helpline. Individuals raising concerns in good faith can do so without fear of retaliation. The mechanism is independently managed and permits confidential and anonymous reporting by employees, suppliers and external partners. Reports are formally investigated, with the ARC and Board receiving regular summaries and the Ethics Committee involved in serious or strategic cases.
- A modern slavery or labour rights concern may be reported through the whistleblowing hotline. On receipt, the Group's process includes triage, protection from retaliation, preservation of confidentiality, investigation, immediate action to protect affected people, engagement with relevant suppliers and authorities where appropriate, corrective action, access to remedy and monitoring to closure. Our channels are available in English and French languages and communicated to employees, contract workers, partners and suppliers and other stakeholders⁸.

Remediation

- During 2025/26, no confirmed or suspected incidents of modern slavery, forced labour or child labour were identified.
- Where an incident is identified, remediation may include engagement with the relevant partner or supplier protecting employment where appropriate, providing access to support and cooperating with competent authorities. The Group seeks to consider the potential loss of income or other unintended harm to affected workers and vulnerable families when designing remediation.

Training and capacity building

- Airtel Africa provides training on modern slavery risks to employees and contractors, 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 the onboarding protocols for new hires. Suppliers also receive guidance and updates to reinforce expectations.
- During 2025/26, our people completed 655,907 hours of learning, a 54% increase from the previous year, including mandatory compliance-related training, which was delivered in hybrid online and physical method which reflects our continued investment in building skills and capabilities across the business.
- Our mandatory compliance-related training is delivered annually and covers Code of training, anti-bribery and corruption (ABAC) and IT security matters⁹.

Evaluating our progress and effectiveness

- During financial year 2025/26, we conducted an ESG SAQ amongst 100 of our top suppliers by procurement spend and received a 55% completion rate. Several survey questions focused on human rights protection. The results revealed that 96% (2025: 96%) of respondents had a written Code of Conduct or Code of Business Ethics.¹⁰
- Our internal audit team regularly assesses compliance with all internal policies and regulatory obligations and is carried out in partnership with auditors from EY's internal audit services.
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⁸ Our whistleblowing policy is available on corporate website www.airtel.africa

⁹ For more information, see Sustainability Report 2026, pages 62-64

¹⁰ For more information, see Sustainability Report 2026, page 53

- As a member of JAC, which represents telecommunications service providers working with shared vendors across the ICT industry, Airtel Africa benefited from five JAC shared supplier audits completed in 2025/26, enabling us to identify potential gaps, assess risk exposure and engage constructively with suppliers to drive continuous improvement (vs. seven audits of shared suppliers completed by JAC members in 2024/25).
- During the 12 months ended 31 March 2026, we investigated 106 incidents (2025: 73) received through various touchpoints and our formal whistleblowing channels. These incidents varied in magnitude and the measures taken in response have been reported to the ARC. Of these 98 cases, 92% have been closed. Reports alleging Code of Conduct breaches were thoroughly investigated, and disciplinary action was taken where appropriate. Most reports received during the period were HR-related issues that indicated there were no modern slavery concerns from the complaints received and investigated.
- Effectiveness is assessed using quantitative and qualitative information, including ESG SAQ completion and results, annual supplier self-certifications, screening results, audit findings and closure of open items, training completion, grievance data, remediation outcomes and stakeholder feedback. Findings are reviewed by compliance team, internal audit and Sustainability Committee. These are also reviewed by CSCO and used to adjust supplier engagement priorities, onboarding requirements, contract management, training and future due diligence.

Board approval

The modern slavery policy statement was approved by the Board of directors on 22 July 2026.

Signed on behalf of the Board of directors of Airtel Africa plc by Sunil Taldar, chief executive officer, on 30 September 2026.

Sunil Taldar

Sunil Taldar

CEO

Airtel Africa plc