Airtel Africa plc

Carbon accounting and reporting methodology

June 2026

Contents

Carbon accounting and reporting

Airtel Africa's carbon accounting and reporting methodology guides our approach to tracking our climate impact. It provides the methodology we use to calculate our emissions and defines the boundaries and components of our scope 1, 2 and 3 emissions.

Introduction

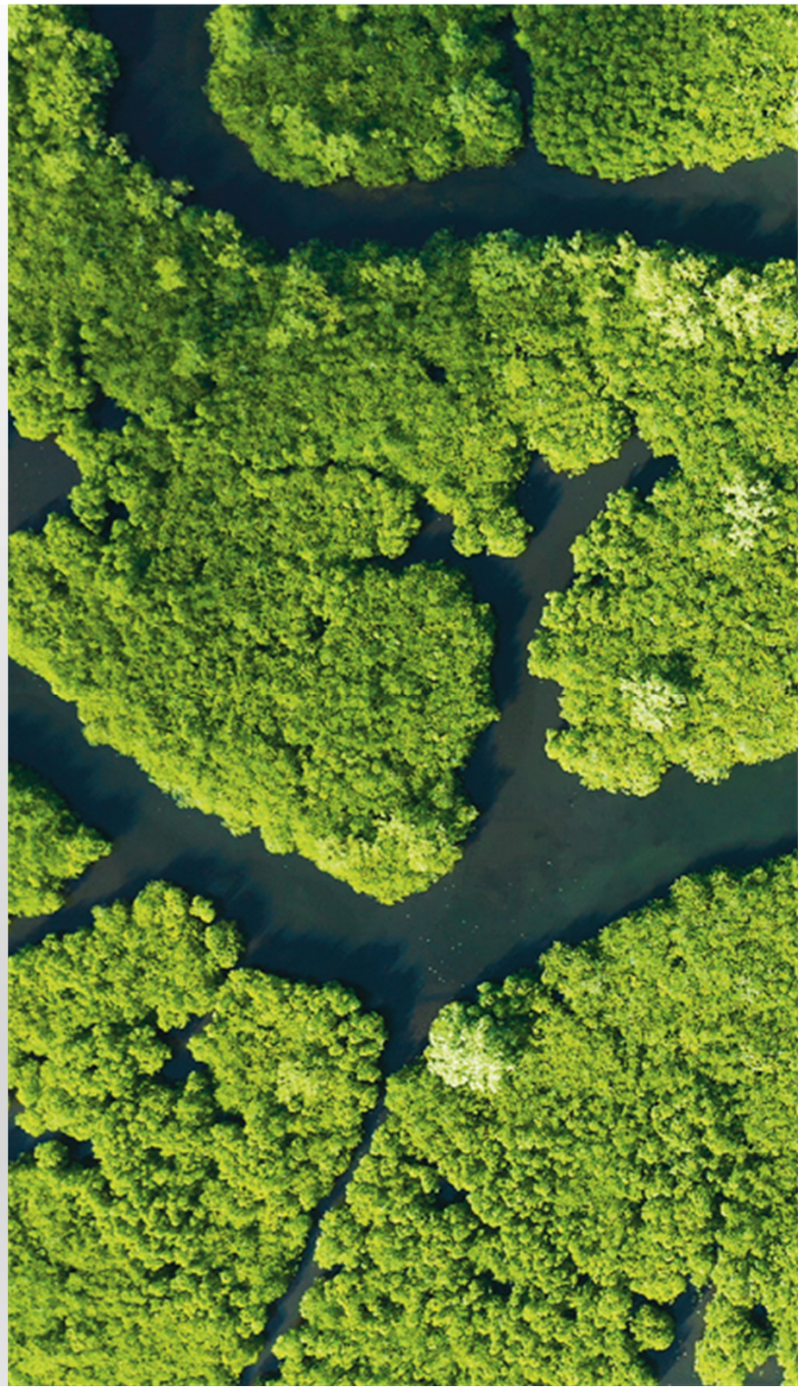
At Airtel Africa, we recognise the potential effects of the climate crisis on the continent and acknowledge our responsibility to limit our environmental impact. We're focused on reducing our carbon emissions through various programmes to improve our operational energy efficiency.

Airtel Africa fully supports the 2015 Paris Agreement to limit global temperature rises below 1.5°C. We're also aligned to the Global System for Mobile Communications (GSMA) Task Force's ambition to reduce the impact of GHG emissions arising from the telecommunication industry.

Our carbon accounting methodology is applicable to Airtel Africa plc and all its subsidiaries (the 'Group'). It sets out our approach and practical steps for calculating our carbon emissions in line with global standards. This document is an integral part of our 'Journey towards a net zero future'.

>> For more information about Airtel Africa's GHG emissions, see **'Our journey towards a net zero future'** published on www.airtel.africa

>> For reference summary, see **page 15**



Background

Scope 1, 2 and 3 emissions

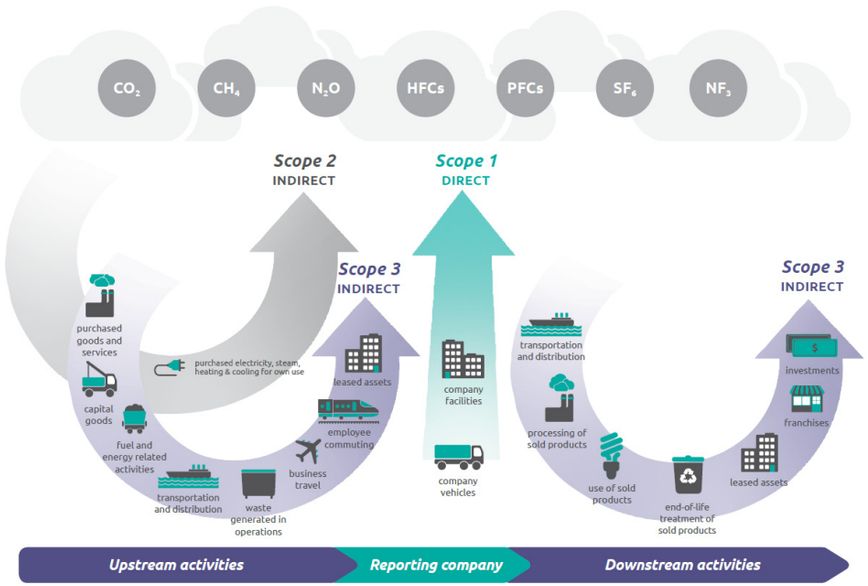
Greenhouse gas (GHG) emissions arise from a range of sources within an organisation's operations and value chain. To understand a company's carbon footprint, emissions must be categorised according to their sources. Emissions are divided into direct (scope 1) and indirect (scope 2 and 3).

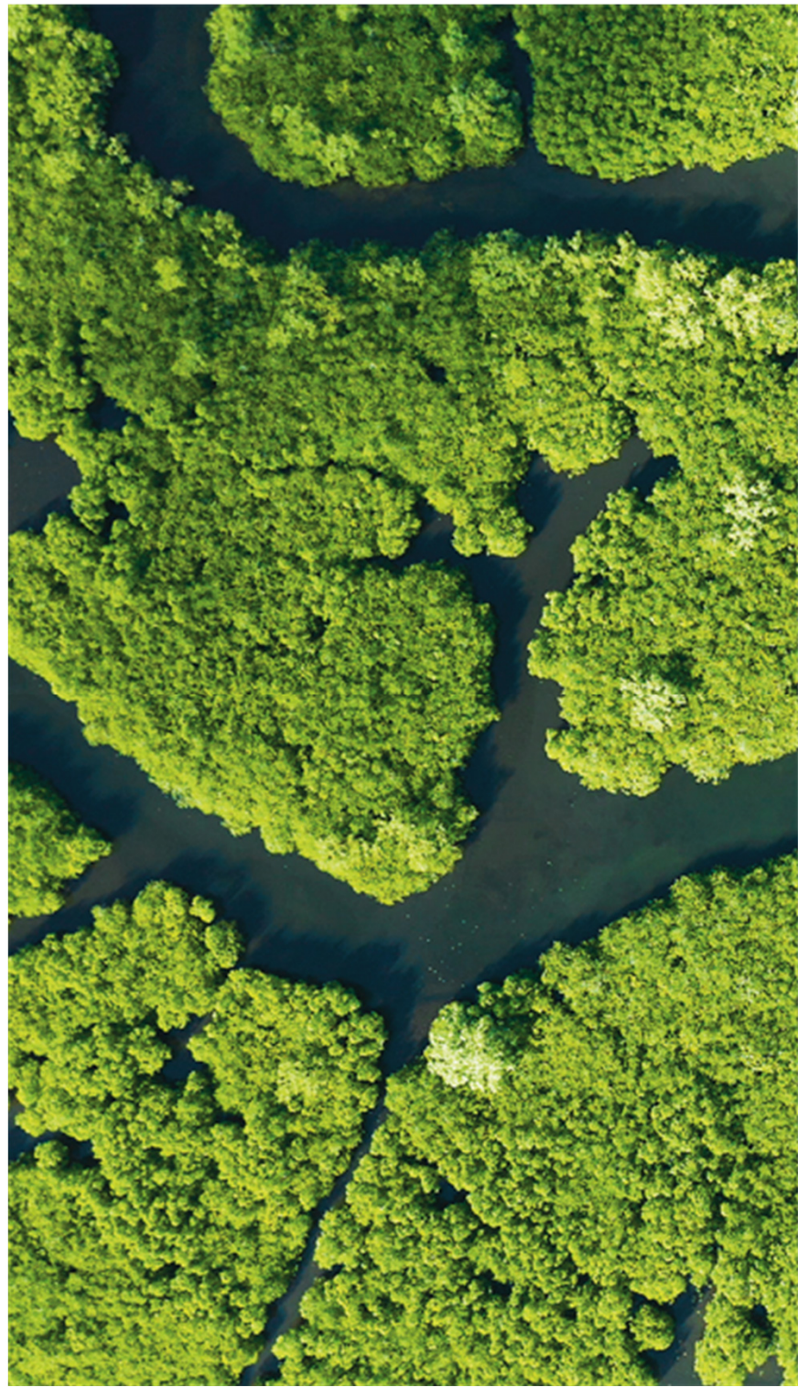
Together, scope 1, 2 and 3 carbon emissions provide a comprehensive picture of all emissions resulting from an organisation's operations and value chain. See Figure 1 for an overview of where scope 1, 2 and 3 emissions sit within a company's value chain and the activities with which they are associated.

At Airtel Africa, we adhere to the GHG protocol, an internationally accepted system for accounting and reporting on GHG emissions.

>> For more information on our carbon accounting principles, see Appendix 1

Figure 1: Overview of greenhouse gas (GHG) emissions across the value chain





Definitions

Scope 1

Scope 1 emissions are all direct emissions resulting from operations that are owned or controlled by an organisation. For Airtel Africa these include emissions from diesel generators and vehicles as well as refrigerant emissions arising from air conditioners and other cooling units.

Scope 2

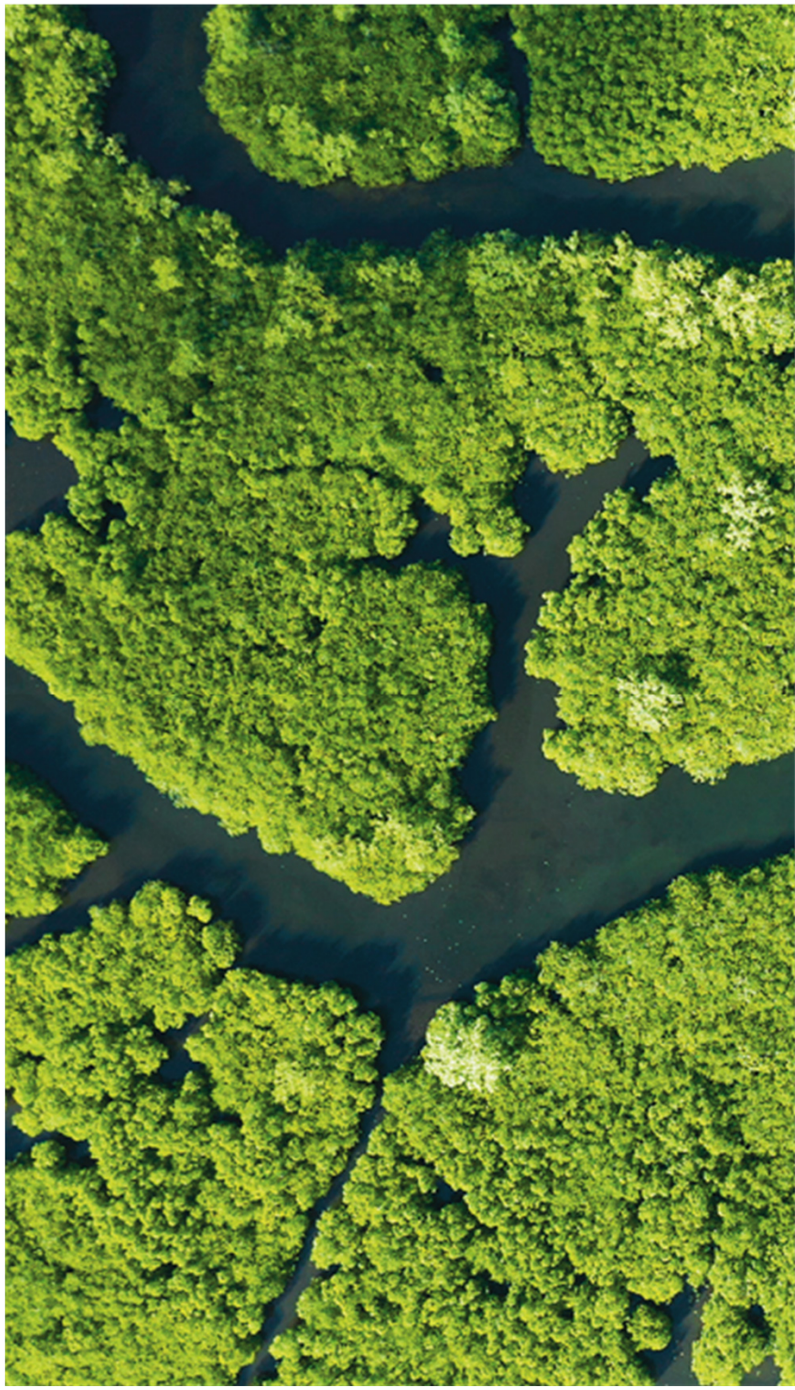
Scope 2 emissions are indirect emissions from the generation of purchased or acquired electricity, steam, heating or cooling used by the organisation. For Airtel Africa, this relates to purchased electricity for powering operations.

Scope 3

Scope 3 emissions are all indirect emissions (not included in scope 2) that occur in an organisation's value chain, both upstream and downstream emissions. Upstream emissions are indirect GHG emissions related to purchased or acquired goods and services. Downstream emissions are indirect GHG emissions related to sold goods and services.

Scope 3 emissions are divided into the following 15 categories:

1. Purchased goods and services
2. Capital goods
3. Fuel- and energy-related activities (not included in scope 1 or scope 2)
4. Upstream transportation and distribution
5. Waste generated in operations
6. Business travel
7. Employee commuting
8. Upstream leased assets
9. Downstream transportation and distribution
10. Processing of sold products
11. Use of sold products
12. End-of-life treatment of sold products
13. Downstream leased assets
14. Franchises
15. Investments



Boundary setting

To accurately account for, and report on, Airtel Africa's GHG-emissions, we first identified the entities to include in calculations. This is defined as the 'organisational boundary'. Then we identified the carbon emitting activities and/or assets associated with those entities to include in our carbon footprint. This is defined as the 'operational boundary'.

We use the **control approach** that is widely adopted and recommended for setting our organisational boundary. The alternative equity share approach is not applied.

Using the control approach, we account for our GHG emissions from operations over which we have financial and/or operational control (Airtel Money kiosks and mini-shops are excluded from our calculations as their emissions are considered immaterial). Emissions from operations where we own an interest but have no control are not included in our emissions accounting.

Control can be defined in financial terms or operational terms:

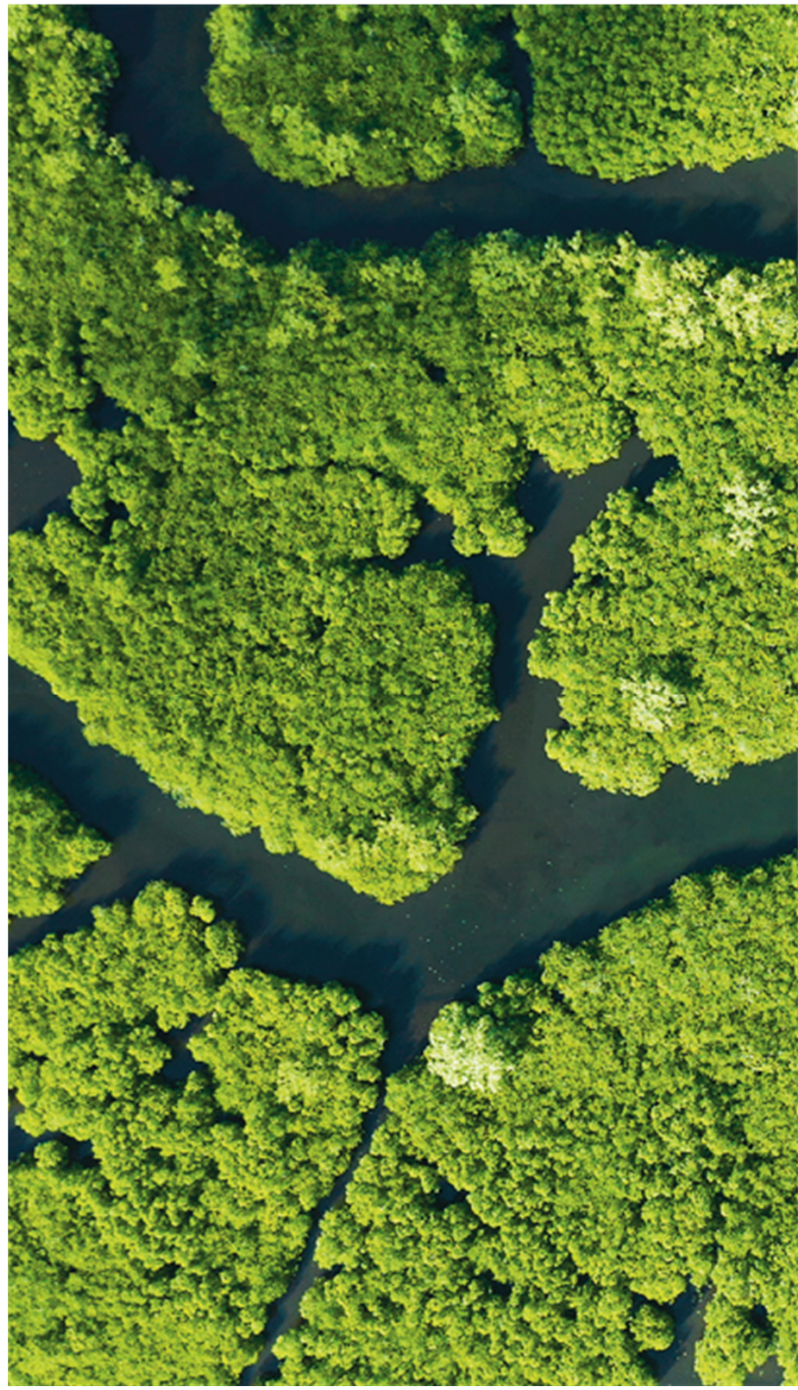
- **Financial control:** in this scenario, an organisation has financial control over an operation if the organisation can direct the financial and operating policies to gain economic benefits from the operation's activities.
- **Operational control:** in this scenario, an organisation has operational control over an operation if the organisation, or one of its subsidiaries, has full authority to introduce and implement its policies.

As of March 2025, Airtel Africa had both financial and operational control over all its entities. Therefore, for the purpose of our boundary-setting, all entities in which Airtel Africa is the majority shareholder continue to be included in the organisational boundary, as shown in **Appendix 2**.

This process involves identifying all sources of emissions associated with our operations and categorising these emissions either as direct (scope 1) or indirect (scope 2 or 3).

We ensure the operational boundary is uniformly applied to identify and categorise direct and indirect emissions at each operational level of Airtel Africa.

>> For more information about the Group's entities, see **Appendix 2**



Approach to GHG emissions calculations and reporting

Airtel Africa ensures that carbon accounting data is complete, consistent and transparent. The following sections set out the approach to calculating our scope 1, 2 and 3 emissions.

Approach and reporting process

Approach

Airtel Africa always ensures that carbon emission data is complete, consistent and transparent as per established carbon accounting principles. This consistent and uniform application of our carbon accounting methodology and scope 1, 2 and 3 modelling ensures we:

- establish an accurate baseline
- set out robust decarbonisation targets against our baseline
- monitor and report our progress against defined targets and timelines
- fulfil climate/carbon regulatory reporting requirements.

Currently, financial and operational data is collected manually across all operations and entered into models, specifically developed by the Carbon Trust, which calculate our scope 1, 2 and 3 emissions.

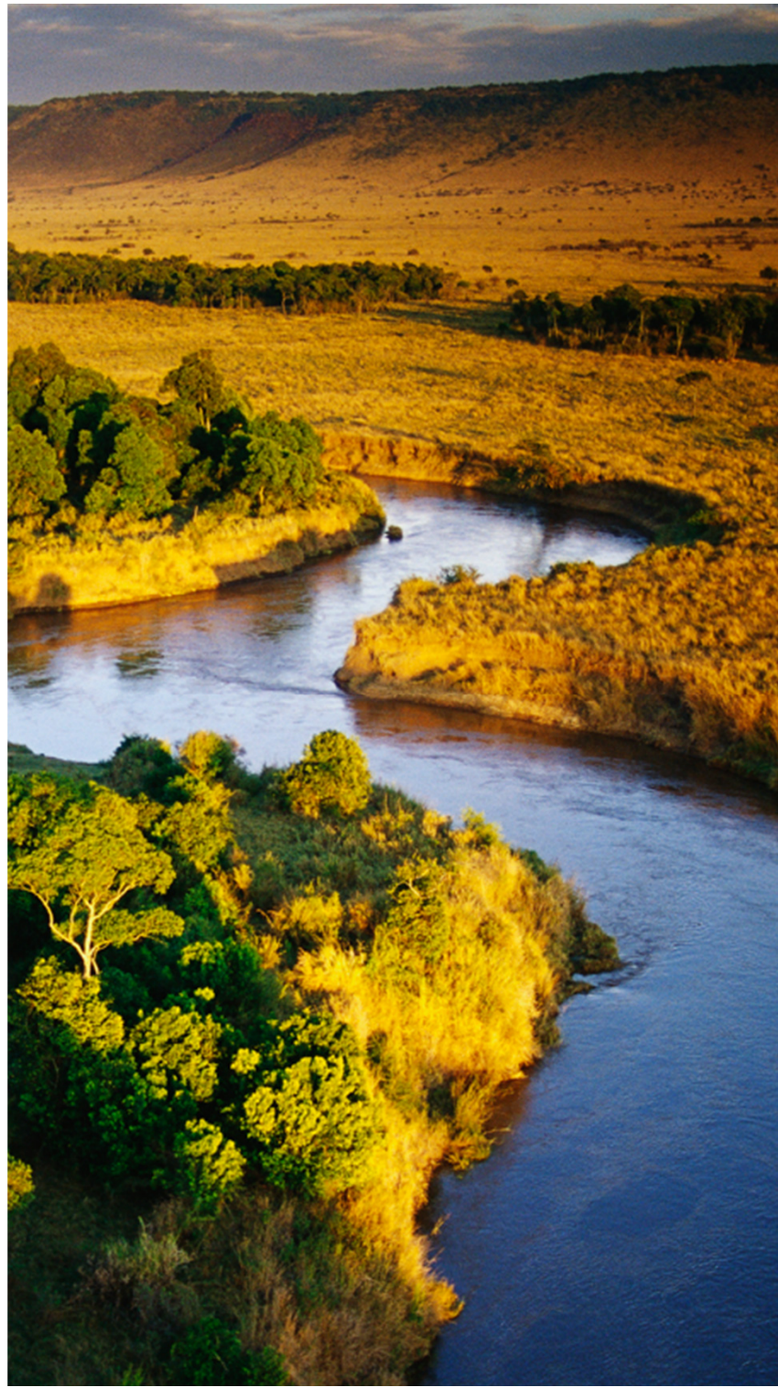
We recognise that automating this process through either standalone or integrated carbon data processing platforms will increase efficiencies and reduce margins for error. We'll introduce a platform as our carbon accounting journey progresses in the future.

Carbon accounting and reporting period

Airtel Africa's carbon accounting period runs in parallel with the financial reporting: from 1 April to 31 March. This approach has multiple benefits, including:

- alignment of quarterly and annual reporting periods for those involved in financial and carbon data collection
- the opportunity to analyse annual carbon footprint data against financial data. For example, this allows us to calculate the quantity of GHG emissions for every US dollar in revenue generated.
- the use of audited financial data for scope 3 carbon footprint calculations where financial data often underpins calculations. This has informed our decision to report scope 3 emissions with the one-year lag.

Scope 1, 2 and 3 emissions are reported in tCO_2e.



Scope 1 and 2 emissions

Approach and boundaries

Data related to the company's energy consumption is collected in each OpCo* and other locations where we are present in four asset categories. This covers the Group's full operational boundaries, i.e. all 14 markets in scope, including investment or holding companies, shared services centre and headquarters (see Figure 2).

The primary sources of our GHG emissions are gathered as follows:

1. **electricity and diesel** consumption is collected for each of the four primary data categories
2. **refrigerants** leakage data is estimated at 3% of total installed capacity where cooling systems are in place
3. **fuel consumption** data is collected for all diesel generators across our network as well as other assets which consume fuel such as fleet vehicles.

Once the collection of energy consumption data is completed across all OpCos, this information is converted into carbon emissions based on the relevant emissions factors, accepted internationally, which are applied to the source of the emissions (e.g., fuel type) and location (adopting the location-based scope 2 methodology).

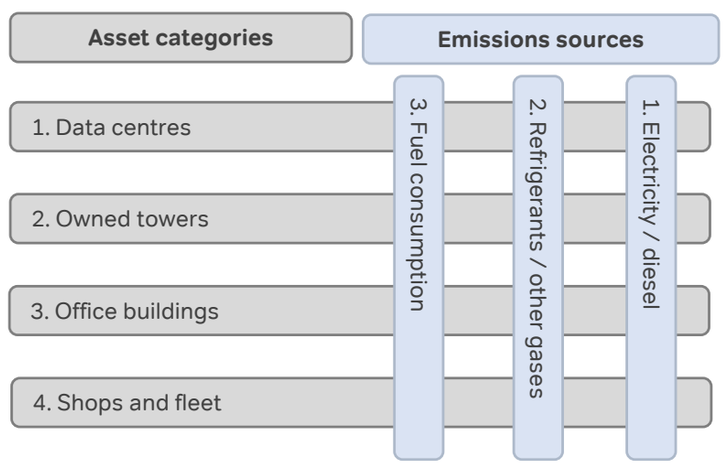
* Operating company

Exclusions

Market-based emissions are not used for scope 2 given the Group does not currently purchase renewable energy contracts such as renewable energy guarantees of origin or purchase power agreements.

Carbon dioxide equivalent (CO_2e) includes the global warming potential of greenhouse gases of carbon dioxide but excludes the impact of CH4, N_2O, HFCs, PFCs and SF6 as noted by the GHG Protocol.

Figure 2: Airtel Africa's asset categories and associated emissions sources represent the its operational boundary



>> See our full organisational boundary in **Appendix 2**

Methodology for emissions' calculations

Scope 1

Information on fuel consumption data is collected from each OpCo. Each OpCo is required to provide commentary or supporting evidence on any significant variances. Scope 1 fuel consumption is collected in litres and refrigerant gases are estimated in kilograms.

Diesel usage in generators is primarily measured on the volume of diesel purchased every month, rather than the measurement of diesel consumed. We're currently improving processes to enhance monitoring, measuring and reporting our diesel consumption.

Emissions are calculated from fuel consumption data (in litres) and converted using the relevant emissions factors. The emissions factor applied to fuel consumption is sourced from the annually updated Department for Energy Security and Net Zero (DESNZ).

For fuel conversion factors, the Group uses the net calorific value metric.

Scope 2

Information on electricity usage is also collected from each OpCo. Electricity consumption is reported for each asset class in kWh, with commentary and supporting evidence provided for any notable variances compared to prior data.

Emissions factors are applied to electricity consumption using country specific IEA emissions factors (updated annually) except:

- If IEA emissions factors are not available for a certain country, and has not been previously published, the African average emissions factor is applied (e.g., Malawi and the Seychelles)
- If IEA emissions factors have previously been published, and subsequently not available, the prior period IEA factor is applied (e.g., Chad and Tanzania)
- If IEA emissions factors appear unreasonable based on discussions with industry experts, we will use the higher of the average African emissions factor and the IEA country-specific emissions factor to ensure prudence (the DRC).

Use of estimates for both scope 1 and 2 emissions

In certain circumstances, when there are challenges or delays in receiving relevant and timely information from our vendors, estimates are used. These estimates will be primarily derived and extrapolated from the previous months' actual historical data as necessary. This will then be applied to the current period's calculations.

The use of estimates is applied when information is not available prior to reporting deadlines.

Scope 3 emissions

Materiality

In this methodology, we recognise that scope 3 reporting guidance requires us to report on all scope 3 emissions and to disclose and justify any exclusions. Scope 3 categories that are not material to our operations or sustainability strategy are excluded from our reporting (see page 12). The materiality of scope 3 category is defined using seven key criteria:

1. size: they contribute significantly to our total anticipated scope 3 emissions
2. influence: there are potential emissions reductions that we could undertake or influence
3. risk: they contribute to our risk exposure (e.g., climate change related risks such as financial, regulatory, supply chain, product, customer, litigation and reputational risks).
4. stakeholders: it is deemed critical by key stakeholders (e.g., customers, partners and suppliers, investors, communities, etc.)
5. outsourcing: they are outsourced activities that were either previously performed in-house or currently performed in-house by contractors.
6. sector guidance: the category has been identified as significant by sector-specific guidance
7. other: it meets any additional criteria for determining relevance to Airtel Africa or telecommunications industry.

Approach

There are two primary approaches available to calculating scope 3 emissions:

1. The **life cycle assessment (LCA)** approach multiplies quantity-based data with emissions factors that are specific to those quantities. While it produces a more accurate scope 3 carbon footprint, it's a resource-intensive approach that requires extensive processes to be put in place to collect data from suppliers and customers.
2. The **environmentally extended output/input data (EEOI)** approach multiplies spend-based data with emissions factors and is a less resource intensive approach which is better suited to organisations embarking on a scope 3 emissions calculation journey.

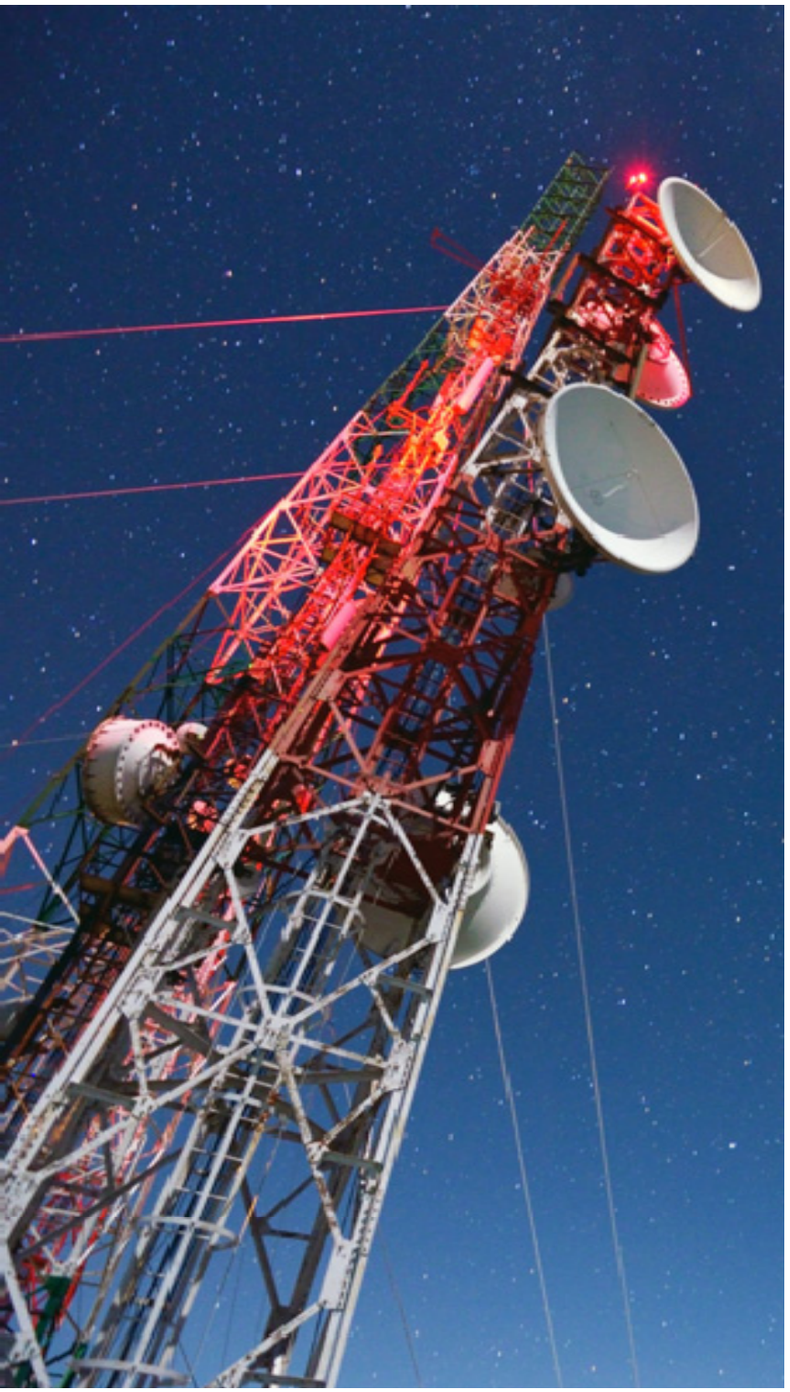
At Airtel Africa, we used a **combination of the LCA and EEOI approach** for calculating our scope 3 emissions baseline and continue to apply this methodology for our annual carbon footprint reporting.

This combined method is best suited for an organisation such as Airtel Africa given our operational structure and geographies.

Excluded scope 3 categories

As per our materiality approach, five out of 15 scope 3 categories have been excluded from the Group's scope 3 carbon footprint as they did not meet the materiality requirements:

1. Category 9: 'Downstream transport and distribution' – Airtel Africa has no downstream transport and distribution and, as transportation and distribution is paid for by Airtel Africa, it is accounted for in scope 3 category 4: 'Upstream transport and distribution'.
2. Category 10: 'Processing of sold products' – Airtel Africa sells final products to end-users and does not sell intermediate products which could be further processed, transformed or included into other products. Therefore, this category has been excluded.
3. Category 13: 'Downstream leased assets' – Airtel Africa's leased assets have already been accounted for in scope 1 and 2 emissions calculations which includes all owned towers. Therefore, this category has been excluded from scope 3.
4. Category 14: 'Franchises' – franchises are not part of Airtel Africa's business model and the emissions associated with Airtel Money kiosks and mini-shops are deemed immaterial. Therefore, these assets have no relevance to the Group's operations. Furthermore, emissions arising from the Airtel Africa shops have been accounted for in scope 1 and 2 calculations. Therefore, 'Franchises' have been excluded from scope 3.
5. Category 15: 'Investments' – Airtel Africa has no general portfolio investments utilising cash reserves, and all shareholdings in subsidiaries have already been accounted for in scope 1 and 2 calculations. Therefore, this category has been excluded.



Recalculation and restatement policy

Baseline year

Following the launch of our sustainability strategy in 2021, the Group carried out internal assessments and calculated scope 1, 2 and 3 emissions in conjunction with the Carbon Trust. This allowed us to set our baseline emissions and formed the basis for our approach to decarbonisation which was published in our 'Journey towards a net zero future' in May 2023. Our GHG emissions for the year ended 31 March 2022 have been set as baseline.

Basis for recalculation and scenarios

The recalculation will adjust the baseline year emissions to account for material changes in accordance with three potential scenarios. In addition, the adjustment of baseline and any subsequent years will be carried out if the increase or decrease in emissions is greater than 5% of the total GHG emissions.

Scenario 1: operational changes

Asset disposals or M&A may affect the comparable information. In addition, this may also include any operational changes associated with the in-sourcing or outsourcing of business activities that impacts the comparability of baseline emissions.

Scenario 2: methodology changes

An impact from an update in emissions factors from the relevant suppliers of such factors. This may include improvements in data collection methodologies and/or updated calculation methodologies or guidance from the GHG Protocol.

Scenario 3: other changes

These changes may include the discovery of a significant error, or cumulative errors, which misrepresents the comparability of emissions relative to the baseline year. This may also include changed to the operational boundary (e.g., inclusion of a different type of scope 3 emissions category).

Appendices

Carbon accounting principles

Carbon accounting refers to the recognition and consolidation of carbon emissions arising from operations in which a parent organisation holds a control or equity interest, and linking data to specific operations, sites, geographies, business processes and owners. This is related to carbon reporting, where carbon data is presented in formats tailored to the needs of various reporting users and uses.

Carbon accounting is underpinned and guided by carbon accounting principles which aim to guarantee that an accounted carbon emissions inventory constitutes a fair, true and accurate representation of an organisation's carbon footprint. Our carbon accounting is based on five principles to ensure that the representation is accurate and transparent. These include:

1. Relevance: ensures that a carbon inventory accurately reflects our carbon emissions and effectively serves in decision-making process.
2. Completeness: all emissions sources and activities within the inventory boundary must be accounted for and reported on.
3. Consistency: using consistent methodologies allows for accurate performance tracking of emissions over time. This includes documenting changes to data, inventory boundaries, methods and any other relevant factors in the time series.
4. Transparency: appropriate references to accounting and calculation methodologies as well as data sources must be made. All relevant issues must be addressed in a factual manner based on a clear audit trail.
5. Accuracy: carbon emissions need to be quantified as accurately as possible to prevent over- and under-reporting, and uncertainties need to be reduced as far as is practicable.

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Reference summary

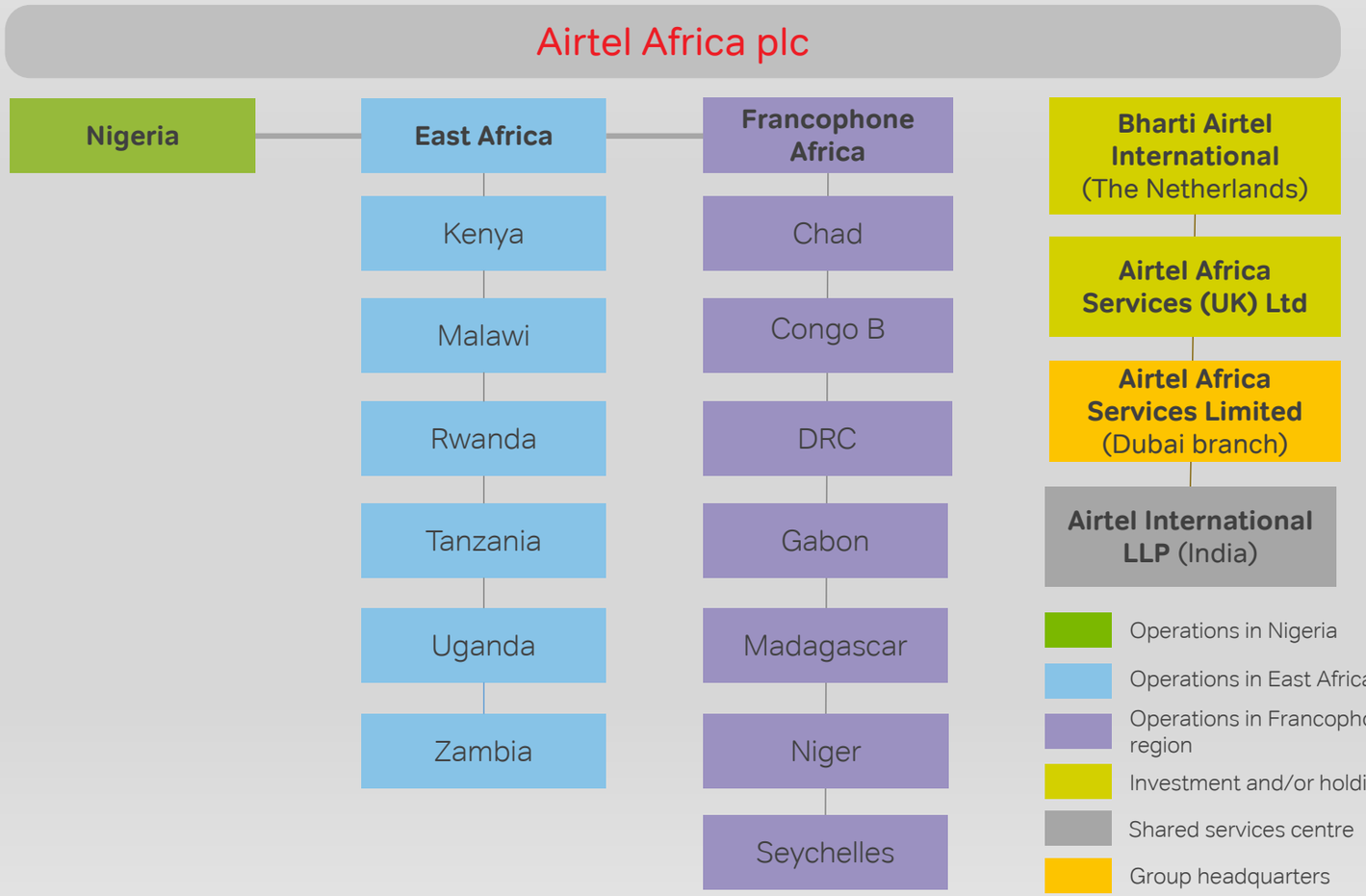
[1] IPCC Sixth Assessment Report: https://www.ipcc.ch/assessment-report/ar6/

[2] GHG Protocol: https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf

[3] Technical Guidance for Calculating Scope 3 Emissions: https://ghgprotocol.org/scope-3-technical-calculation-guidance

Airtel Africa's operational control boundary

Figure 3: OpCos and entities within the organisational boundary and under our operational control



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