



Tax strategy

Airtel Africa plc (Company, or the 'Group')

1.0 Preamble

Airtel Africa's tax strategy defines the approach to managing the Group's tax affairs. It has been approved by the chief financial officer and is subject to yearly review.

This strategy is applicable to Airtel Africa plc and its subsidiaries.

This strategy is compliant with the requirements of para 16(2) and 22(2) of Schedule 19, Finance Act 2016, and relates to our 31 March 2024 year-end.

2.0 Group overview

Airtel Africa is a leading provider of telecommunications and mobile money services, with a presence in 14 countries in Africa, primarily in East Africa and Central and West Africa. We offer an integrated suite of telecommunications solutions to our subscribers, including mobile voice and data as well as mobile money services both nationally and internationally. We aim to provide a simple and intuitive customer experience through streamlined customer journeys.

We operate in a complex and dynamic environment, with economic controls, technological progressions and an increasing focus on digitisation. As a responsible corporate citizen, we align our business growth with the social and economic well-being of the communities where we operate.

3.0 Our approach to developing good governance in relation to taxation

We are committed to being a responsible and collaborative taxpayer that supports the social and economic well-being of the communities where we operate.

To manage the way we do business, we have implemented a robust framework of internal controls, processes and ongoing monitoring and assessment procedures). This framework has been designed to identify, assess and manage a broad range of operational, finance and tax risks. It is underpinned by regular internal assessments and reporting to ensure that we continue to operate on a 'no surprises' basis.

Our tax strategy is set by the Board of directors. Our chief executive officer (CEO) and chief financial officer (CFO) direct and oversee the policies and procedures which monitor and control its implementation.

Our head of tax is responsible for operationalising the tax strategy within our business and leads a team of local tax and finance specialists to ensure this is managed effectively. Head of tax reports directly to our chief financial officer.

4.0 Our approach to structuring our affairs

Our vision and values as well as our Code of Conduct govern how we manage our tax affairs. This means that when making decisions about how we structure our operations, we will always seek to be compliant and respectful of local legislation and make decisions which are based on sound commercial principles and aligned with where our economic activity is. Our policy is to never undertake structuring which is contrived or artificial. All transfer pricing arrangements will

be consistent with the OECD Transfer Pricing Guidelines and in particular follow the arm's length principle.

However, tax can be very complex so we approach our obligations with an appropriate level of analysis and consideration as would any good taxpayer. Where there are cases of uncertainty or significant complexity in relation to tax, then we may seek external advice before making any decisions.

Where business decisions drive us to make changes to the way we structure our operations, we will assess any resulting tax implications and engage with local tax authorities in a collaborative manner to explain the rationale and agree on next steps. We seek to build positive relationships with tax authorities as partners to our business.

Our Board of directors is involved in making any significant structuring decisions in relation to tax.

5.0 Our approach to managing risk in relation to taxation

As a responsible corporate citizen, we apply tax legislation accurately and consistently, claiming only tax incentives and reliefs which are intended to apply to us and help us to continue investing in the communities we serve.

We believe that we should be paying our fair share of tax in the locations where we have economic activity.

Our tax risk governance framework which is aligned with our legal and regulatory governance frameworks provides us with clear visibility and control over our tax status, with the ultimate objective of reducing and eliminating tax uncertainties arising in the way we operate.

These tax risk management procedures are rigorously monitored and maintained to ensure that our low tax risk tolerance is operationalised effectively.

6.0 Dealing with tax authorities

We engage with all relevant tax authorities, including HM Revenue and Customs (HMRC), with honesty, integrity and fairness. Our aim is to build and maintain a constructive and collaborative relationship with authorities wherever we operate.

We actively engage with tax authorities regarding our business structuring, where there may be areas of uncertainty in terms of tax treatments, or where disputed issues have arisen. We will seek to discuss and agree on the fairest outcome wherever this is possible.

Where we cannot reach an agreement with the relevant tax authority on the proper interpretation of the law and there is no other practical means of achieving agreement, then we will not shy away from taking the legal route through the appropriate appellate mechanism provided under the laws of the country in question. We aim to collaborate appropriately with tax authorities on the conduct of such actions.