



Human Rights & Freedom of Expression Policy

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VERSION 1.0

1 Introduction

This policy outlines the steps that AFRICELL GLOBAL HOLDINGS Ltd (the “Company”) and its affiliates must follow to ensure compliance with the UN Guiding Principles for Business and Human Rights.

2 Human Rights & Freedom of Expression

- The Company strives to be compliant with all applicable rules and regulations in the countries where it operates;
- The Company respects the rights of its customers using its network and connectivity services and is against any form of discrimination;
- Customers have the right to freely and responsibly use the Company’s digital communications while ensuring that privacy and information security are upheld.
- The Company will, as and when permitted, continue to influence the development of new laws relevant to the telecommunications industry while ensuring that the impact on freedom of expression is limited.

3 Responding to Government Demands

Under certain circumstances the Company may, based on requests from local government agencies, and in accordance with local laws and regulations, be required to:

- Restrict access to its services;
- Perform lawful interception and provide said government agency with actual communications;
- Disclose communications data;
- Shut down its network and restrict access to the internet;
- Perform IP/URL blocking and filtering by applying a filter at the network level.

The Company must, at all times, seek to respect internationally recognized human rights laws while being compliant with the applicable local laws in the countries where it operates.

Moreover, the Company will never go beyond what is required by law when responding to government agencies requests and must challenge every request and assess all options while comparing against its licence terms and conditions prior to fully cooperating with the government agency.

Subsequently, the restriction is only enforced after a thorough assessment of the potential impact the restriction may cause and the availability of remedies to affected customers.

4 Grievance Mechanisms

- The Company will, by all possible means, protect its employees from any pressures enforced on them by regulatory or governmental agencies requesting unlawful requests.
- The Company’s customers are able to directly communicate any concerns they have via the Company’s website. The customers also have the option to communicate their concerns anonymously.