

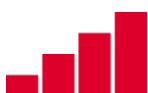
# **“Speak Up” Policy & Procedure for Members and Business Partners**

October 2023



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# 1. Purpose and Scope

The GSMA is committed to the highest standards of trust, transparency, and accountability. This policy applies to all members & business partners as well as all entities within the GSMA, their employees, contactors, consultants, directors, officers. In line with this commitment, the GSMA encourages all GSMA members and business partners who have concerns about any aspects of the GSMA's work, to come forward and voice those concerns. The GSMA is committed to ensuring all stakeholders feel confident that they can report any suspected impropriety, misconduct, or wrongdoing without any risk to themselves.

## 2. The GSMA's commitment

**2.1 The GSMA strongly encourages every individual to report any concern** or case where they genuinely, in public interest, believe that any one of the below is occurring, has occurred or may occur within the GSMA:

- A breach of our Participant's Code of Conduct or a law, including, but not limited to, antitrust, fraud and corruption
- A breach of or failure to comply with the GSMA governing documents
- Questionable accounting or auditing practices
- A miscarriage of justice
- The endangering of an individual's health and safety
- Damage to the environment
- Improper or unethical conduct including discrimination or harassment of any kind.
- Misuse of information to further private interests or gain an unfair advantage
- Deliberate concealment of information relating to any of the above

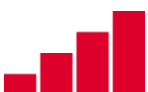
This policy does not replace individual's other reporting procedures within their own organisation.

**2.2 The GSMA does not expect individuals to investigate the matter themselves or to provide evidence to prove that their concern is well-founded.**

**2.3 The GSMA will keep the identity of the individual making the disclosure confidential,** to the fullest extent possible, subject to overriding legal requirements.

**2.4 The GSMA is committed to ensuring that all the GSMA Participants feel confident that they can report wrongdoing without any risk to themselves or their organisations.** The GSMA commits to protecting the individual making the disclosure from all forms of retaliation including harassment, disadvantage or discrimination as a result of speaking up within the realms of control within the GSMA.

**2.5 The GSMA expects individuals making a disclosure to have a reasonable belief of wrong doing.** GSMA will ensure no detriment to individuals making the disclosure, where they honestly believe that their information is true, irrespective of the results of further investigation.



## 3. Member & Business Partners Responsibilities

- Speak up if you are aware of any wrongdoing.
- Provide as much information as possible to ensure that a proper investigation can be carried out, and respond to additional information requests, if required.
- If you receive a report of a concern, whether formally or not, report it immediately using one of the disclosure channels below.

## 4. Disclosure channels

You can raise your concerns by contacting GSMA's [General Counsel](#) or [HR Director](#) . Alternatively you may wish to use our external reporting channels to [log a report online](#), or [call \(select country from drop down menu, and then "Call" which will provide the relevant number\)](#).

It is possible to make an anonymous disclosure unless restricted by local jurisdictions, but individuals are strongly encouraged to make named disclosures. The GSMA will maintain the confidentiality of the information disclosed and the identity of the individual, subject to overriding legal requirements.

## 5. What happens when a concern has been reported?

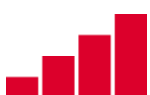
The GSMA will be responsive and act upon any concerns raised.

You can remain anonymous if you wish but we would encourage you to provide us with your contact details so that we can inform you of the progress of your report as well as ask for further information which would help in the investigation, subject to the constraints of confidentiality and the law.

If not comfortable in leaving your details, you will be given a Report Key that will enable you to log into the "report file" to see the progress of review and feedback given.

## 6. Review

This policy will be reviewed at least annually by GSMA Risk and Compliance to ensure it remains effective and meets the needs of the GSMA, Employees, Members and Business Partners.



**Version** 3  
**Owner** Simon Hutchins, Head of Risk and Compliance  
**Department** Risk and Compliance  
**Reviewer** Monique Cormier, GC  
**Approver** Louise Easterbrook, CFO  
**Document Location** GSMA.com  
**Next scheduled review** October 2024

**Change History**

Version	Date	Owner	Approver	Approval Date	Description of Changes
2.0	25.08.2016	Niharika Khanna	Louise Easterbrook	25.08.2016	Change of name; introduction of external reporting channels; additional guidance on disclosure management
3.0	11.10.2023	Simon Hutchins	Louise Easterbrook		Change of scope, change in disclosure channels, review plan, new brand template

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