



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

August 2016

1. Purpose and scope

The GSMA is committed to the highest standards of trust, transparency, and accountability. In line with this commitment, we encourage all the 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 that they feel confident to "Speak Up" 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
- 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 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.

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

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

2.5 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.

4. Disclosure channels

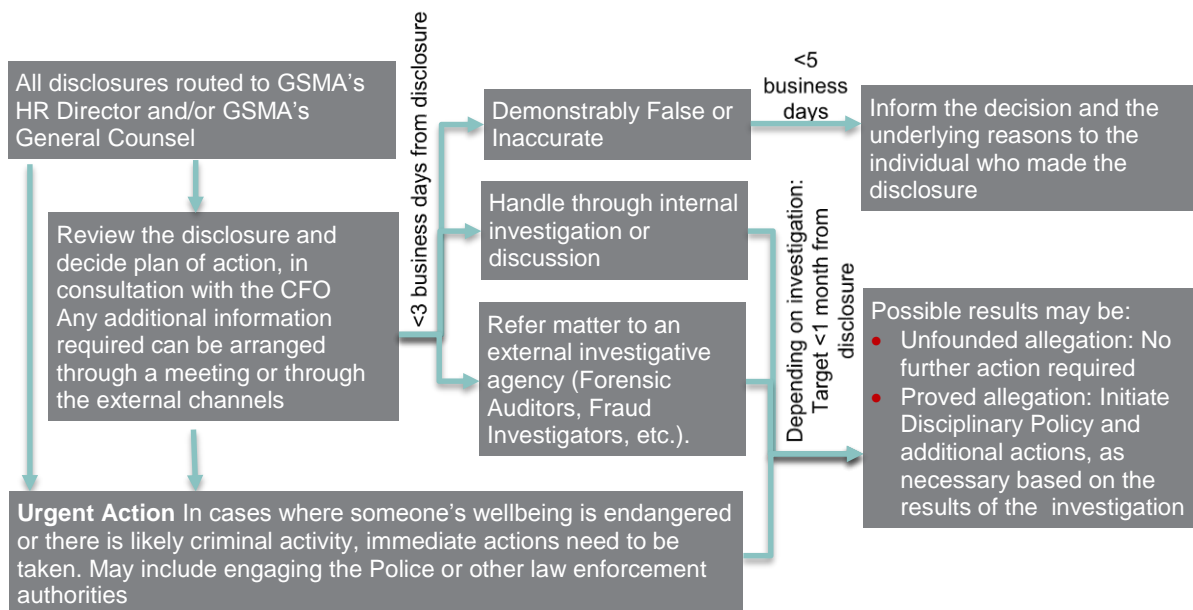
Disclosures can be made via GSMA's external reporting channels, using any of the below alternatives:

- [log a report online](#);
- send an [email](#); or
- make a call [here](#). While making a call, please indicate that the call is with respect to GSMA.

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. Below is a snapshot of how the disclosure would be handled and the tentative timelines:



During and after the investigation, the individual making the disclosure will be informed of the status of the investigation and its outcome, subject to the constraints of confidentiality and the law.

Document control sheet

Version	2.0
Owner	Niharika Khanna, Internal Governance Manager
Department	Internal Governance
Reviewer	Ashley Turner, Head, Internal Governance
Approver	Louise Easterbrook, CFO
Document Location	GSMA.com
Next scheduled review	August 2018

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
