



SCANCOM PLC
(MTN Ghana)
Conflicts of Interest Policy

Business Area	MANAGEMENT - COMPANY SECRETARY		
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Effective Date	MAY 2020	Next Review Date	APRIL 2021
Policy Owner	PALA ASIEDU OFORI		
CEO on behalf of Executive Committee of Scancom Plc.	SELORM ADADEVOH		
CEO on behalf of EXCO	SELORM ADADEVOH		

1. POLICY APPROVAL

This Scancom Plc. (MTN Ghana) Conflicts of Interest Policy is a Governance Policy of MTN Ghana. The applicable Policy approval process, as set out in the MTN Group Master Policy, shall apply to this Policy.

2. DEFINITIONS AND ABBREVIATIONS

The definitions contained in this MTN Ghana Conflicts of Interest Policy (this “Policy”) must be read with the definitions in the MTN Group Master Policy. General definitions and abbreviations which are applicable across all MTN Group Policies are provided for in the MTN Group Master Policy and only Policy specific definitions are provided for in this

Policy.

Term	Description
Applicable Person	All Directors, Employees of MTN Ghana, third party contractors and direct contractors. Applicable Persons shall refer to any or all of the persons listed in this provision, as the context may so admit or require.
Assessment Team	The Assessment team refers to the MTN Ghana Risk & Compliance team in coordination with the Company Secretary who will assess a declared Declarable Interest to determine whether or not a conflict exists.
Business Relationship	An association between individuals or companies entered for commercial purposes.
CEO	Chief Executive Officer
Close Associate	A close personal or Business Relationship with a friend, colleague, ex-colleague or connection.
Conflict/s of Interest	A perceived, potential or actual situation in which a direct or indirect conflict between the professional duties and private interests of an Applicable Person may result in personal bias, obligations or loyalties which unduly influence the objective exercise of that person's duties or impairs the reputation of his/her business area in relation to MTN's stakeholders.
Declaration	A formal acknowledgement made by an Applicable Person in respect of any Declarable Interests, including those of his/her Family Members, which are to be recorded in a central repository that is managed by the Company Secretary
Declarable Interest	An External Financial Interest, Ownership or Personal Financial Interest held by an Applicable Person, including the following: 1. directorship or officer of any company or other business entity; 2. dominant shareholding in any company or other business entity; 3. trusteeship or officer of a trust; 4. participation in professional bodies, forums, or activities where MTN's time and resources are being utilised; 5. other business partnerships; or 6. any other business held by or involving the Applicable Person's Family Member(s) where MTN Ghana is directly or indirectly dealing with such entity or business or 7. any other interest which may be perceived or has the potential to or actually influences the Applicable Person's duties or obligations towards MTN Ghana.

Term	Description
Close Associate	Executive Committee members of Scancom Plc.
External Financial Interests	Any monetary interests gained like salary or other payments for services or equity interests like shares, intellectual property rights and the like.
Family Member	A parent, spouse, civil partner, partner, child, immediate in-laws, siblings, nieces and nephews.
Ownership	Claim, right or share of profits and losses of any monetary interest, stocks, stock options, intellectual property rights and the like.
Personal Financial Interest	A direct material interest of an Applicable Person (cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, travel, hospitality, accommodation, sponsorship, other incentive, or valuable consideration, other than: 1. an ownership interest; 2. any interest held by a person in a unit trust or collective investment scheme; 3. training, that is not exclusively available to a selected group of providers or representatives, excluding travel and accommodation associated with that training; 4. products and legal matters relating to those products; 5. general financial and industry information; or 6. specialised technical systems of a Third Party necessary for the rendering of a service.

3. INTRODUCTION

3.1. MTN Ghana's reputation is based on integrity and trust in its business relationships, and the delivery of products and services to its customers. In safeguarding these values, MTN endeavours to uphold the highest ethical standards and ensure compliance with relevant legislation in carrying out its business activities and fulfilling its obligations to MTN stakeholders.

3.2. The Policy arose as a safeguard against Applicable Persons having personal or business interests that have the actual, potential and may be perceived to influence the independence and objectivity of their decision making due to associations from which they may derive a benefit.

3.3. Furthermore, the Policy does not seek to discourage Applicable Persons from contributing to outside activities that have a benefit to society but to provide guidance for ethical conduct in relation to their obligations to MTN Ghana.

4. PURPOSE OF THIS POLICY

4.1. The purpose of this Policy is to:

- 4.1.1. ensure that the actions of all Applicable Persons are transparent;
- 4.1.2. ensure compliance with the key principles and standards set out herein;
- 4.1.3. Provide Applicable Persons with guidance and awareness on identifying, declaring and managing a Conflict of Interest;
- 4.1.4. protect MTN Ghana and Applicable Persons from any Conflict of Interests; and
- 4.1.5. ensure compliance to regulatory and leading practice requirements.

5. SCOPE AND APPLICABILITY

5.1. This Policy addresses MTN Ghana's position on compliance with ethical standards in respect of Conflicts of Interest.

5.2. This Policy applies to all Applicable Persons as defined above.

6. POLICY STATEMENTS

6.1. MTN Ghana recognises that the management of Conflicts of Interest is of high importance in promoting ethical conduct. The Declaration of Conflicts of Interest is therefore essential in protecting the integrity and objectivity of MTN Ghana's decision-making process and strengthens confidence among stakeholders in MTN Ghana's business activities and its procedural and governance structures.

6.2. All disclosures made, and the register maintained in terms of this Policy will be treated as confidential and in accordance with this Policy.

6.3. Any non-compliance or breach will be managed by management of MTN Ghana which shall be guided by the MTN Ghana Risk Escalation and Acceptance Policy and/or subject to MTN Ghana's consequence management, as documented in the MTN Group Master Policy.

7. KEY PRINCIPLES

The key principles below are to ensure that any perceived, potential or actual Conflicts of Interest are identified and addressed effectively.

7.1. The exercise of good judgment is always required by Applicable Persons and during all interactions with MTN Ghana's stakeholders. All Applicable Persons are obliged to act in the best interests of MTN Ghana.

7.2. Applicable Persons have a duty to utilise all the time and resources belonging to MTN Ghana for the benefit of MTN Ghana.

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7.2. Applicable Persons have a duty to utilise all the time and resources belonging to MTN Ghana for the benefit of MTN Ghana.

7.3. An Applicable Person must avoid Personal Financial Interests which conflict or may conflict with his/her professional duties or obligations to MTN Ghana, MTN Ghana's business activities, and the best interests of MTN Ghana or its Stakeholders.

7.4. Recusal of an Applicable Persons from involvement in an affected decision-making process (e.g. procurement, recruitment etc.) should be enforced. However, care must be exercised to ensure that all affected parties to the decision have knowledge of the measures taken to protect the integrity of the decision-making process where recusal is adopted.

7.5. It is not permissible for an Applicable Person to:

7.5.1. conclude contracts or arrangements or receive or place business on behalf of MTN Ghana for his/her financial or personal gain;

7.5.2. use his/her position or authority to influence or make decisions that lead to any form of financial or personal gain for him/herself, his/her Close Associates or Family Members;

7.5.3. use his/her position to solicit investment by MTN Ghana in a business owned by him/her or his/her Close Associates or Family Members;

7.5.4. use or disclose any information obtained from MTN Ghana which is not generally available to the public for personal gain for him/herself, his/her Close Associates or Family Members or for any reason other than for business purposes authorised by MTN Ghana;

7.5.5. source or promote any commercial activities for a third party for financial or personal gain for him/herself, his/her Close Associates or Family Members;

7.5.6. either for him/herself or as the agent of another person, solicit, coerce; interfere with, entice, or endeavour to entice any Employee of MTN to become employed in any business, firm, undertaking or company, directly or indirectly, in competition with the business carried on by MTN Ghana; or

7.5.7. engage in any other conduct that may be construed or identified as constituting a Conflict of Interest or is contrary to the spirit of this Policy.

8. DECLARATION OF INTERESTS

8.1. The purpose of a Declaration is to provide information to MTN Ghana and Stakeholders with the relevant interests of an Applicable Person in ensuring proper governance, accountability and transparency. Declarable Interests or any other interest that have the potential to or actually influences the judgement, deliberation or actions of an Applicable Person in his/her professional capacity, or which might be perceived by stakeholders as such, must be declared. (Shareholding in listed companies of less than 1% would usually be excluded unless it has potential to influence judgement, deliberation or actions).

8.2. Each Applicable Person is required to attest whether he/she has any Declarable Interest. Where he/she has such an interest, he or she shall act in accordance with the below specified;

It is the responsibility of the Applicable Person to ensure that his or her Declaration remains current for the duration of his/her employment. In furtherance of this an Applicable Person is required to update his/her Declaration as and when a change occurs.

Employees are required to complete a Declaration in respect of any Declarable Interest, subsequent to the commencement of employment and before the end of the year on an annual basis within the time frame communicated by the Company Secretary.

8.3. Each Applicable Person has the responsibility to submit a Declaration via the Conflict of Interest policy submission link published by the Company Secretary or via such process as may be communicated by the Company Secretary from time to time, for the declaration of interests. An Employee shall subsequently send a direct notification to direct line manager to inform him/her about their participation in the Declaration exercise

8.4. For the avoidance of doubt, the submission of Declarations is to acknowledge that the Declaration has been submitted to the appropriate office and shall not be construed as an approval of any actual, perceived or potential Conflict of Interest.

8.5. Furthermore where there has been a change of circumstances in relation to an accepted Conflict of Interest by the management of MTN Ghana, such change shall be deemed a Declarable Interest and shall be declared in accordance with this Policy.

8.6. Where a candidate/third party is being considered for employment, contracting, procurement sponsorships, training, development or business ventures at MTN Ghana, an employee who is a Close Associate or Family Member of the candidate must make a Declaration to this effect. An assessment is to be undertaken and, where applicable, approval shall be granted (see Clause 9).

8.7. Without prior written approval from MTN Ghana, no Applicable Person who is a Close Associate or Family Member of the any candidate shall be permitted to be included in the interviewing and decision-making process of the candidate/third party and should recuse him/herself from such process.

8.8. Applicable Persons who intend to or are entering into a Business Relationship with Third Parties must declare such Declarable Interest and shall only proceed upon an assessment by MTN Ghana Risk & Compliance division of the Declaration and a written approval by management of MTN Ghana.

9. ASSESSMENT OF DECLARABLE INTEREST AND MANAGEMENT OF CONFLICT OF INTEREST OTHER THAN DIRECTORS

9.1. It is always best to avoid a Conflict of Interest situation; Applicable Persons must avoid being in Conflict of Interest situations.

9.2. The assessment of a declared Declarable Interest shall be done by the Assessment Team.

9.3. The Assessment Team shall provide directions on the management of a Conflict of Interest upon assessment, and the management of MTN Ghana shall be responsible for implementing the directions of the Assessment Team and provide progress feedback to the Assessment Team.

9.4. The assessment of whether a Declarable Interest constitutes a Conflict of Interest entails a consideration of the impact of the interest declared on MTN Ghana's business in general, reputation, the risk of financial loss, the risk of criminal or civil lawsuits and the potential breach of this Policy and MTN Ghana's ethical standards.

10. DECLARATION, ASSESSMENT OF DECLARABLE INTEREST AND MANAGEMENT OF CONFLICT OF INTEREST FOR DIRECTORS

10.1. The Company Secretary shall at the commencement of each year obtain from the Directors of the Company, a declaration of Directors' Interests duly signed by the Director, and setting out the director's designation and extent of interest.

10.2. Where a Director has a Declarable Interest relating to the business or agenda item of a meeting, that Director shall disclose such interest at the meeting and before the consideration of the related business or agenda item.

10.3. The chairperson of the meeting shall in consultation with Directors present determine whether the declared Declarable Interest puts the Director involved in a Conflict of Interest position, and if so found that Director shall recuse himself from the discussion or decision-making process of that business or agenda item and the same shall be noted in the minutes of the meeting. Where a Director is found not to be in conflict, he or she shall carry out his or her normal duties as Director.

10.4. The terms of this Policy applies to Directors except where excluded or particularly provided for.

10.5. Executive Directors shall be required to comply with paragraphs 8.3 and 10.1 herein.

10.6. The MTN Group Conflict of Interest Practical Guide shall guide the Assessment Team and the Board in understanding and managing Conflicts of Interest.

ROLES AND RESPONSIBILITIES

11.1 All **Applicable persons** are required to submit to the website provided any potential, perceived or actual Conflicts of Interest. Notification must be given to the First Line Management in a one up principle with a copy to the Company Secretary. The onus is on every employee to comply with this Policy.

11.2 Should any individual be uncertain as to whether they are in a conflicted situation, for example- whether the offer they wish to make or the offer which has been made to him/her, or whether a particular action or omission amounts to a Conflict of Interest, such employee shall follow the procedure as set out in A above and shall make the declaration for assessment.

11.3 Management in each Division in conjunction with their teams, must, on an ongoing basis, provide oversight and identify any actual, perceived or potential Conflicts of Interest which may arise within his or her area. These must be reported in accordance with this Policy.

11.4 The Company Secretary shall maintain and provide oversight over the Conflicts of Interest register. The Assessment Team shall review the Conflicts of Interest register periodically to determine whether conflicts already identified still pose a risk to MTN or whether the mitigation strategies in place operate effectively or whether there are any new or potential conflicts that may have arisen since the last review or any continuing conflicts that have not been effectively managed as directed.

11.5 The Risk and Compliance Division is to disseminate a report to the Audit and Risk Committee on all interests of Applicable Persons that have been recorded as Conflicts of Interest. The report is to include recommendations regarding any measures to be implemented in respect of the management of such Conflicts of Interest.

11.6 The Audit and Risk Committee is responsible for reviewing the adequacy and effectiveness of MTN Ghana's systems of internal controls, relating to Conflicts of Interest, and the means through which declarations are managed.

11.7 The Company Secretary must on an on-going basis provide oversight and identify any actual, perceived or potential conflict of interest which may arise

12. REFERENCED DOCUMENTS/RELATED POLICIES

In addition to the documents referenced below, this Policy must be read in conjunction with the MTN Group Conduct Passport, Group Risk Escalation and Acceptance Policy and Master Policy, which sets out the principles and related activities to provide guidance on minimum standards with which compliance is mandatory.

Document Name	Publication Date	Published By
MTN Ghana Anti-Bribery and Corruption Policy		
MTN Ghana Code of Conduct and Ethics		
MTN Ghana Gifts, Hospitality and Entertainment Policy		
MTN Ghana Whistleblowing Policy		
MTN Ghana Privacy Policy		
MTN Conflict of Interest Practical Guide		

GENERAL DECLARATION AFTER READING THE CONFLICT OF INTEREST

I hereby confirm and affirm that:

- I have reviewed a copy of the Conflict of Interest Policy;
- I have read and understood the policy;
- I agree to comply with the policy.

Annexure 1

Pursuant to the Conflict of Interest Policy provide a response to the Questions below

Whether you have or had any Declarable Interest from the year 2019 to date?

☒ Yes

☐ No

What Declarable Interest can you attest to:

Question	Answer
directorship or officer of any company or other business entity;	Anthony Jackson Associates
dominant shareholding in any company or other business entity;	Macias Mckay Co
trusteeship or officer of a trust;	Vega and Peterson Plc
participation in professional bodies, forums, or activities where MTN's time and resources are being utilised;	Fry and Dawson Associates
other business partnerships; or	Mcbride and Bryant Traders
any other business held by or involving the Applicable Person's Family Member(s) where MTN Ghana is directly or indirectly dealing with such entity or business or	Clemons Ellis Trading
any other interest which may be perceived or has the potential to or actually influences the Applicable Person's duties or obligations towards MTN Ghana.	Ramsey Murray Plc
Name of entity or venture in which employee has the Declarable Interest	Vinson and Ray Associates
Provide any additional information which will be relevant to the Assessment Team in its decision	Shaw and Holloway Associates

Annexure 2

Pursuant to clause 3.2 of the Conflict of Interest Policy, provide a response to the Question below:

In the year 2019 to date, have you had any personal or business interests that have actually influenced, potentially influenced or may have been perceived to influence the independence and objectivity of your decision-making due to associations from which you may derive a benefit?

☐ Yes

☐ No

If YES, complete the following

Question	Answer
Describe the nature of the personal or business interest.	
State the corporate or business name of the such business interest, if applicable.	
Specify which decisions have been affected by this conflict of interest.	
Describe how the personal or business interests have actually influenced, potentially influenced or may have been perceived to influence your decision-making independence and objectivity.	
Provide any additional information which will relevant to the Assessment Team in its decision.	

Annexure 3

Pursuant to clause 7.3 of the Conflict of Interest Policy, provide a response to the Question

Have you in 2019 to date undertaken any Personal Financial Interests which conflict or may conflict with your professional duties or obligations to MTN Ghana, MTN Ghana's business activities, and the best interests of MTN Ghana or its Stakeholders?

☐ Yes

☐ No

If YES, complete the following

Question	Answer
Describe the nature of such Personal Financial Interests.	

Question	Answer
State the value of the Personal Financial Interest.	
Specify which of your professional duties or obligations have been affected by the conflict.	
State which of MTN Ghana's business activities, and best interests were affected by the conflict.	
Describe the way such Personal Financial Interests conflict or may conflict with your professional duties or obligations to MTN Ghana, MTN Ghana's business activities, and the best interests of MTN Ghana or its Stakeholders.	
Provide any additional information which will be relevant to the Assessment Team in its decision.	

Annexure 4

Pursuant to clause 7.5.1 of the Conflict of Interest Policy, provide a response to the Question below:

In the year 2019 to date, have you concluded any contracts or arrangements or received or placed business on behalf of MTN Ghana for your financial or personal gain, or for the gain of a Family Member or Close Associate?

☐ Yes

☐ No

If YES, complete the following

Question	Answer
Describe the nature of the contracts or arrangements, also indicating where such contracts were placed or were received by MTN Ghana.	
State the value and the nature of the financial or personal gain received from contracts or arrangements.	
State the corporate or business names of the other parties involved in the contracts or arrangements.	
Provide any additional information which will be relevant to the Assessment Team in its decision.	

Annexure 5

Pursuant to clause 7.5.2 of the Conflict of Interest Policy, provide a response to the Question

In the year 2019 to date have you used your position or authority to influence or make decisions that led to any form of financial or personal gain for yourself, Close Associates or Family Members?

☐ Yes

☐ No

If YES, complete the following

Question	Answer
Describe the nature of financial or personal gain received by you as a result of using your position or authority to influence in MTN.	
Describe the nature of financial or personal gain received by the Close Associate or Family Member as a result of using your position or authority to influence in MTN.	
State the name of the person or entity from whom the financial or personal gain was received.	
Describe how you used your position or authority to influence and make decisions for the personal or business gain yourself, Close Associates or Family Members.	
Provide any additional information which will be relevant to the Assessment Team in its decision.	

Annexure 6

Pursuant to clause 7.5.3 of the Conflict of Interest Policy, provide a response to the Question below:

In the year 2019 to date, have you used your position to solicit investment by MTN Ghana in a business owned by you, your Close Associates or Family Members?

☐ Yes

☐ No

If YES, complete the following

Question	Answer
State the value of the solicited investment.	
State the name of business owned by you, which solicited the investment.	
Describe the nature of the soliciting business owned by you your Close Associates or Family Members.	
Provide any additional information which will relevant to the Assessment Team in its decision.	

Annexure 7

Pursuant to clause 7.5.4 of the Conflict of Interest Policy, provide a response to the Question below:

In the year 2019 to date have you used or disclosed any information obtained from MTN Ghana, which is not generally available to the public, for personal gain for yourself, your Close Associates or Family Members or for any reason other than for business purposes authorised by MTN Ghana?

☐ Yes

☐ No

If YES, complete the following

Question	Answer
Describe the nature of the commercial activities involved.	
State the value of the sourced or promoted commercial activities.	
State the corporate or business names of the third-parties involved in the commercial activities.	
Describe the details of financial or personal gain for yourself or Close Associates or Family Members from the commercial activities.	
Provide any additional information which will relevant to the Assessment Team in its decision.	

Annexure 8

Pursuant to clause 7.5.5 of the Conflict of Interest Policy, provide a response to the Question below:

In the year 2019 to date have you sourced or promoted any commercial activities for a third-party for financial or personal gain for yourself, your Close Associates or Family Members?

- ☐ Yes
☐ No

If YES, complete the following

Question	Answer
Describe the information that was used or disclosed without proper authorisation.	
State the value or describe nature of personal gain or your Close Associates or Family Members for yourself from using or disclosing this information.	
Describe how the information was used or disclosed.	
Provide any additional information which will relevant to the Assessment Team in its decision.	

Annexure 9

Pursuant to clause 7.5.6 of the Conflict of Interest Policy, provide a response to the Question below:

In the year 2019 to date have you, either for yourself or as the agent of another person, solicited, coerced, interfered with, enticed, or endeavoured to entice any Employee of MTN to become employed in any business, firm, undertaking or company, directly or indirectly, in competition with the business carried on by MTN Ghana?

- ☐ Yes
☐ No

If YES, complete the following

Question	Answer
Provide the name(s) of employee(s) whom you solicited, coerced, interfered with, enticed, or endeavoured to entice into competitive business.	

Question	Answer
State the name of the business, firm, undertaking or company that was, directly or indirectly, in competition with MTN.	
Provide any additional information which will be relevant to the Assessment Team in its decision.	

Annexure 10

Pursuant to clause 7.5.7 of the Conflict of Interest Policy, provide a response to the Question

In the year 2019 to date have you engaged in any conduct that may be construed or identified as constituting a Conflict of Interest or is contrary to the spirit of this Policy?

- ☐ Yes
☐ No

If YES, complete the following

Question	Answer
Provide details of such conduct which may be considered a Conflict of Interest or is contrary to the spirit of this Policy?	
Explain your motivation for pursuing such conduct.	
Provide any additional information which will relevant to the Assessment Team in its decision.	

Annexure 11

Pursuant to clause 8.1 of the Conflict of Interest Policy, provide a response to the Question below

In the year 2019 to date have you or are you aware of any Declarable Interests or any other interests that have the potential to or actually influence your judgement, deliberation or actions as an Applicable Person in your professional capacity, or which might be perceived by stakeholders as such?

- ☐ Yes
☐ No

If YES, complete the following

Question	Answer
Describe the nature of the Declarable Interest.	
Explain how these Declarable Interests have the potential to or actually influence your judgement, deliberation or actions as an Applicable Person in your professional capacity, or which might be perceived by stakeholders as such?	
Provide any additional information which will relevant to the Assessment Team in its decision.	

Annexure 12

Pursuant to clause 8.6 of the Conflict of Interest Policy, provide a response to the Question

In the year 2019 to date, has a Close Associate or Family member of yours been considered for employment, contracting, procurement sponsorships, training, development or business ventures at MTN Ghana?

☐ Yes

☐ No

If YES, complete the following

Question	Answer
Were you part of the decision making process?	
Did you recuse yourself?	
Was the Close Associate or Family member successful in securing employment, contracting, procurement sponsorships, training, development or business ventures with MTN Ghana?	
Provide any additional information which will relevant to the Assessment Team in its decision.	

Annexure 13

Pursuant to clause 8.8 of the Conflict of Interest Policy, provide a response to the Question below:

In the year 2019 to date have you or do you intend to enter into any Business Relationship with Third Parties?

☐ Yes

☐ No

If YES, complete the following

Question	Answer
Describe the nature and details of such business relationship.	
Provide the names of the Third Parties with whom you intend to enter such business relationships.	
Provide any additional information which will relevant to the Assessment Team in its decision making.	

Annexure 14

Pursuant to clause 11.2 of the Conflict of Interest Policy, provide a response to the Question

From the year 2019 to date, have you been or are you uncertain as to whether you are in a conflicted situation, for example - whether an offer made or to be made to you, or whether a particular action or omission amounts to a Conflict of Interest?

☐ Yes

☐ No

If YES, complete the following

Question	Answer
Describe the nature and details of the situation.	
Provide the names of the Third Parties with whom you intend to enter such business relationships.	
Provide any additional information which will relevant to the Assessment Team in its decision making.	

Annexure 15

Pursuant to clause 11.3 of the Conflict of Interest Policy, provide a response to the Question

From the year 2019 to date, have you or are you aware or have you become aware of any actual, perceived or potential Conflicts of Interest arising within your department, division or in the Company?

- ☐ Yes
☐ No

If YES, complete the following

Question	Answer
State the name(s) of the employee(s) involved.	
Describe the nature and all relevant details of such Conflict of Interest.	
Provide any additional information which will relevant to the Assessment Team in its decision making.	

Annexure 16

Pursuant to the Conflict of Interest Policy provide a response to the Question below:

Do you or a family member or close associate own and/or operate a mobile money Agent Business.

- ☐ Yes
☐ No

If YES, complete the following

Question	Answer
For the purpose of the annexure, Mobile Money Agent Business means	
Whereas Mobile Money Merchant Business means	

Question	Answer
How many Mobile Money Agent Business do you operate?	
How many Mobile Money Agent Business do your Family Members or Close Associates operate	
Have you used your position or confidential corporate information to achieve a financial benefit for yourself whiles operating the Mobile Money Agent Business	
Have you used your position or confidential corporate information to achieve a financial benefit for your Family Members or Close Associates whiles they operate the Mobile Money Agent Business	
Provide any additional information which will be relevant to the Assessment Team in its decision making.	

FINAL CONFIRMATION

I, Samuel Hious confirm that all information given by me in respect this Conflict of interest submission is true, complete and accurate to the best of my knowledge.