



30
Years



Doing
it right

MTN Group Limited

Transparency Report for the year ended
31 December 2024

Leading digital solutions for Africa's progress



Welcome to our 2024 Transparency Report

Our purpose is to enable the benefits of a modern connected life for everyone



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Our reporting suite

Our Transparency Report is supplemented by a number of reports that provide a comprehensive view of MTN's performance and prospects covering financial, risk management and environmental, social and governance (ESG) aspects. These reports go beyond traditional financial reporting by integrating sustainability and non-financial information.

Integrated Report

Our primary communication to investors and other stakeholders is designed to enable them to make well-informed evaluations of our performance and prospects, strategic direction and the value we create, preserve or erode through our activities. It offers a forward looking view of MTN's financial and non-financial performance, covering strategy, risks and opportunities, targets and governance.

IR



Materiality lens:
Financial and impact

Sustainability Reporting

The following suite of reports provides information on MTN's strategy and performance related to sustainability issues with the potential to impact our organisation, society and the environment. The reports detail MTN's performance data on a wide range of ESG metrics and targets informed by various standards (see alongside). The reports detail MTN's policies, governance strategies, risks and opportunities relating to sustainability considerations.

SR



Sustainability Report

CR



Climate Report

TR



Transparency Report

ESG



ESG Data Booklet

Materiality lens: Impact

Regulatory and reporting frameworks used[†]:

SUSTAINABLE
DEVELOPMENT
GOALSEQUATOR
PRINCIPLES

IFRS

SASB
STANDARDS

KING IV

B-BBEE
ActCompanies
ActESG Matrix
for MobileAmended
Financial
Sector Code
(IFSC)IFRS –
S1 and S2UN Guiding
Principles
on Business
and Human
Rights

IABS



[†] For more details see page 147 of our [IR](#).

Information for shareholders

AGM



Notice of AGM

The Notice of AGM and form of proxy give information to shareholders who want to participate in the Group's Annual General Meeting (AGM).

KIV

King IV Assessment
Report

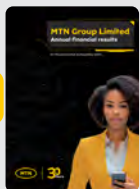
This provides a summary of the application of the King IV™ principles by MTN Group Limited and Mobile Telephone Networks Holdings Limited.

Materiality lens: Financial

Financial Reporting

Our comprehensive financial reports provide detailed insights into our company's performance, which includes an analysis of the Group's financial results, a five-year review and our tax approach. These reports not only highlight our financial health and operational efficiency but also offer a clear view of our strategic direction and prospects.

AFR

Annual Financial
Results

AFS

Annual Financial
Statements

TTR

Tax Transparency
Report

5-YR

Five-year
Review

Materiality lens: Financial

Navigating this report

The following icons serve as reference points to illustrate interconnected themes throughout our reporting suite.

Material information

We unpack our material information in our **SR**

MM
1

Macro

MM
2

Geopolitics

MM
3

Regulatory/tax

MM
4

Finance

MM
5

Platforms

MM
6

Competition

MM
7

Emerging tech

MM
8

Skills

MM
9

Governance

MM
10

DigiFin inclusion

MM
11

Cybersecurity



www.mtn.com

For more detail on our strategic priorities see our Sustainability Report.

ESG remains **at the core** of our strategy. This aligns with our work to advance the United Nations **Sustainable Development Goals (SDGs)** through our business activities and our support of governments, communities and customers. The SDGs target a sustainable society with a plan to end poverty, protect the planet and ensure equality for all by 2030. We are committed to bridging the digital divide, furthering financial inclusion to advance the attainment of the goals.



Our primary SDG contribution areas for shared value creation:



Key indirect opportunities exist in the following SDGs:



About this report

This report provides an overview of MTN's strategy and implementation regarding digital human rights (DHR).

MTN is committed to safeguarding and respecting human rights, particularly digital human rights. Through our networks, products and services, we aim to facilitate digital communication, positively impact society and uphold privacy and security principles. We ensure compliance with human rights safeguards and promote transparency in our actions and disclosures by publishing our annual Transparency Report.

Basis for preparation

Effective operational oversight is crucial, given our expansive operational reach across 19 markets on two continents. This report covers our 13 markets on the African continent. The data presented in this report is obtained through two primary methods. Firstly, a questionnaire was distributed to our operating markets, prompting them to share information about the countries in which they operate. This information was derived from internal records, regulatory documents and government sources. Comprehensive details about market-specific laws, regulators and requests were provided by MTN markets and verified by legal counsel, both within each country and at the Group level. While reasonable efforts have been made to guarantee the accuracy and completeness of the data, it has been compiled based on the best endeavours of our teams using the information provided by our markets.

The second method involved qualitative interviews with senior staff members, the transcription of these interviews and a thematic analysis of the data and policies related to digital human rights. This report provides the following disclosures:

- ▶ Human rights due diligence.
- ▶ Governance of digital human rights in general, and privacy and freedom of expression in particular.
- ▶ Commitments, policies and processes we follow when responding to requests from competent authorities.
- ▶ The legal context that provides authorities in each of our markets with the legal basis to make these kinds of requests.
- ▶ Salient digital human rights issues in our operating context, and associated trade-offs.
- ▶ Number of requests received.
- ▶ Number of requests we rejected.
- ▶ Case studies.

Nothing in this report is intended to be legally binding or amount to a definitive statement of fact for the purposes of any dispute. This report is provided for informational purposes only and should be viewed in a general manner as part of a Group-wide assessment within the MTN Group.

Reporting standards and guidelines

The following standards and guidelines have been applied to this report:

The Global System for Mobile Communications Association (GSMA) Human Rights Guidance for the Mobile Industry

GSMA

Ranking Digital Rights (RDR) Index disclosure criteria

RANKING DIGITAL RIGHTS

United Nations Global Compact (UNGC) transparency standard



The Global Network Initiative (GNI)



United Nations Guiding Principles on Business and Human Rights



Timeframe

This report encompasses the reporting period from 1 January to 31 December 2024. Where feasible, data for the previous two financial years has been included.

Markets covered

The report includes information on our operating markets in 13 countries, namely Benin, Cameroon, Congo-Brazzaville, Côte d'Ivoire, Eswatini, Ghana, Liberia, Nigeria, Rwanda, South Africa, South Sudan, Uganda and Zambia. Guinea-Bissau and Guinea-Conakry have been excluded because of our exit from these markets in 2024. Irancell and Mascom are excluded due to indirect minority shareholding without management control.

Please note, recorded numbers do not include MTN Sudan. This is due to the ongoing conflict and instability within the country, which has made it difficult for us to obtain complete and accurate data from our staff. However, MTN continues to use its reasonable efforts to assess and monitor the situation as circumstances allow.

Feedback

We encourage feedback on this report as part of our commitment to engaging with stakeholders on sustainability and human rights issues. All feedback can be directed to Group Sustainability at humanrights@mtn.com.

Who we are

Our purpose is to enable the benefits of a modern connected life for everyone

MTN is a Pan-African digital operator providing a range of critical data, voice, digital, fintech, wholesale, enterprise and infrastructure services to 290.9 million customers in 16 markets. Our purpose is embodied in our belief statement that *everyone deserves the benefits of a modern connected life*. Our strategic intent is *leading digital solutions for Africa's progress*.

MTN Group Limited is a publicly owned and listed entity whose shares are traded on the Johannesburg Stock Exchange (JSE). At the end of 2024, our market capitalisation was approximately R170.2 billion (US\$9.0 billion). Subsidiaries MTN Nigeria, MTN Ghana, MTN Uganda and MTN Rwanda are listed on the Nigerian Exchange Ltd, the Ghana Stock Exchange, the Uganda Securities Exchange and the Rwanda Stock Exchange, respectively.

Ambition 2025: Leading digital solutions for Africa's progress



Build the largest and most valuable platforms



Drive industry-leading connectivity operations



Create shared value



Portfolio optimisation

Enabled by our values:



Lead with Care



Collaborate with Agility



Act with Inclusion



Can-do with Integrity



Serve with Respect

Creating value for all

We create value for our stakeholders by living our purpose and progressing our strategic intent

MTN achieved a
46.2%

reduction in Scope 1 and 2 emissions (tCO₂e), exceeding our 2024 reduction target of 12.5%

Connected
290.9m

(2023: 284.7m) subscribers

Provided broadband coverage to
93%

(2023: 89.2%) of the population

Enabled internet access to

157.8m

(2023: 146.5m) active data users

Facilitated financial inclusion to

63.1m

(2023: 62.6m) active MoMo users

Improved female representation to

43%

(2023: 40%)

Added economic value of

~R155bn

across our markets

Empowered

14 461

MTNers

Women in leadership

32%

in 2024, against 2025 target of 30%

Achieved a reputation score of

78.5%

Message from our Group President and CEO



Ralph Mupita
Group President and CEO

At MTN, we believe digital connectivity is a force for good, with a responsibility to protect human rights. Amid rapid political and technological change, we affirm that our networks, policies and innovations empower people, safeguard freedoms and promote responsible digital progress. Whether supporting fair elections, advancing AI ethics or strengthening human rights due diligence, we remain committed to a connected world where everyone can thrive.

Our **Ambition 2025** strategy is built on the belief that everyone deserves the benefits of a modern, connected life. Integral to upholding this belief is our commitment to upholding human rights.

In 2024, we continued to face many complex and novel challenges as the world evolves rapidly, both politically and in technological advancements. MTN has continued its focus and commitment to promoting and upholding human rights within the digital landscape. Our Digital Human Rights Policy and our commitments to the United Nations Guiding Principles on Business and Human Rights and UNGC guide our efforts.

The year 2024 was coined as 'the year of elections' with over 60 countries globally concluding their elections. In 2024, we applied our digital human rights due diligence procedures to our markets with elections. At MTN, we understand our role as a telecommunications company as we provide essential services to promote free and fair elections. We further understand that during elections, the risk posed by potential human rights infringements is increased and that we, as a responsible telecommunications company, must go beyond what is necessary to ensure digital human rights are protected during elections.

Accordingly, our robust human rights due diligence procedures that form part of our comprehensive election readiness plans were tested and put into place to maintain that our services ran smoothly and used to enhance the exercise of human civil and political rights during elections.

Our digital human rights due diligence process was once again applied and tested in our exit from Guinea-Bissau where we concluded a digital human rights impact assessment to ensure a responsible exit from the market with no disruption to services or any impacts on human rights.

In embracing technological advancement and contributing towards accelerating Africa's digital future, our policies and approach at MTN continue to advance to maintain guardrails when using such technology as artificial intelligence (AI).

We took this as an opportunity to develop an industry-leading Responsible AI Policy to guide MTN in the responsible use and application of AI. This is as a consequence of MTN recognising and embracing the use of AI and recognising the potential harms. Our Responsible AI Policy is the foundation to ensure that human rights are protected and respected from an AI perspective, and we will continue to develop our policy to align with international best practice and the high internal standards we set at MTN on digital human rights.

At MTN, our commitment to human rights is illustrated through our robust human rights due diligence process. In 2024, as a member of the Global Network Initiative (GNI), MTN underwent its first independent GNI assessment, which assessed and tested our human rights due diligence processes, incident records, initiatives and good faith efforts at MTN in protecting human rights, particularly freedom of expression and privacy rights.

As we are cognisant of the evolving market and socioeconomic and political landscape – marked by rising political and social polarisation, and the increasing threat and spread of misinformation and disinformation – we reaffirm that at MTN, we remain committed to upholding and protecting human rights through our adherence to the United Nations Guiding Principles on Business and Human Rights, and our memberships to the United Nations Global Compact, the GNI and the Internet Watch Foundation.

Our operating context

MTN operates in a vibrant and expanding sector leveraging an increased number of mobile users and emerging technological advancements. With the expansion and economic growth of the market, we need to remain vigilant about current and emerging threats to digital human rights and integrate appropriate mitigation measures.

MTN remains vigilant for the manifestation of current and emerging threats to digital human rights. We constantly aim to improve our processes to promote and uphold digital human rights and maintain a secure and inclusive digital environment across all markets.

As MTN operates in three regions, namely Southern and East Africa (SEA), West and Central Africa (WECA) and Middle East and North Africa (MENA), we are sensitive to the unique regulatory requirements and political and socioeconomic pressures in each jurisdiction. We need to maintain this granular approach to address challenges, such as regional conflicts and government policies, which play a critical role in shaping our digital human rights efforts. Challenges are also presented from an economic perspective, as economic factors such as currency fluctuations and overall stability directly impact our ability to invest in digital infrastructure and safeguard user rights. Requests from authorities across jurisdictions highlight the need for a flexible and adaptive approach to regulatory compliance.

MTN is embracing technological advances. We have implemented Group-wide data protection policies, guidelines and training, regardless of where we operate or deficiencies in domestic legislation. Africa also does not have any regional regulatory framework for AI. In embracing this technology, we have decided to use global best practices and our understanding of our operating markets to inform our Responsible AI Policy. While we welcome the use of AI, we recognise the responsibility that comes with using AI and its potential impact on human rights. This understanding led to the development of our Responsible AI Policy, which ensures that our Group-wide policy is guided by a human rights lens.

We continue to navigate our evolving operating context with a steadfast commitment to digital human rights. Collaborations with organisations, such as the Internet Watch Foundation (IWF), remain vital and underpin our continued commitment in protecting vulnerable users from threats. Our efforts on digital human rights were manifested in the year under review as MTN tested its robust human rights due diligence process in our markets following the national elections. Additionally, we remain committed to child online safety and in doing so, we enhanced our child safety initiatives by concluding research on child safety online in three of our markets. These trends highlight the dynamic nature of our operating context and significantly influence our approach to digital human rights and reporting.



Digital human rights in our operating markets

Promoting and upholding digital human rights throughout our diverse markets is vital. We strive to adapt our approach to each market's unique environment and telecommunications landscape. Through our practices, we ensure the protection and promotion of fundamental digital human rights.

Our commitment to enhancing connectivity is also supplemented with a key focus on online safety, privacy, freedom of expression and the responsible implementation of AI. We are dedicated to promoting inclusivity and equality, with our platform and diverse products fostering financial inclusion. This aligns with our broader mission to harness connectivity for socioeconomic development and protect and advance digital human rights.

Engagement with stakeholders – including regulators, civil society, suppliers and subject-matter experts – helps shape a digital landscape that prioritises privacy and online safety while supporting the responsible use of AI. Through continuous investment in emerging technologies and talent acquisition, we remain at the forefront of evolving security measures, strengthening our commitment to digital human rights across all operations.

MTN remains committed to ensuring that digital human rights are respected, online spaces are secure and innovative technologies are implemented with the correct balance of caution, responsibility and accountability.

MTN acknowledges that merely adhering to compliance requirements is not enough to protect and uphold our customers' digital human rights. Instead, we recognise that safeguarding digital human rights is fundamental to our business operations and our commitment goes beyond regulatory obligations, ensuring that respect for digital human rights is an integral part in our decision-making processes. This approach considers compliance with legislation, regulation and international best practices as well as focusing on respecting and promoting digital human rights to achieve a positive effect and influence on our users and customers when they engage with any of our platforms, products or services.

Overview of Digital Human Rights Issues

Overview of digital human rights issues



Key Digital Human Rights issues

- Access to internet.
- Children's rights and online protection.
- Data privacy and customer protection.
- Uninterrupted network coverage and reliability.
- Incident response and disclosures procedures.
- Geopolitical factors: conflict, elections and government requests.
- Use of AI and the impact on human rights.



Influenced by

- Customer needs and concerns.
- State stability.
- Local legislation.
- Technological advancements.
- Global standards and best practice.



Mitigated by

- Global human rights framework.
- **Ambition 2025** business strategy.
- Zero-harm approach.
- Training.
- Contribution to policy development.
- Sound governance practices.



Challenges

- Conflicting legislation.
- Myriad new guidelines and standards.
- Asymmetry of information.
- Lack of uniform standards and metrics.
- Fragmented legal framework.

Digital human rights in our operating markets continued

Salient digital human rights issues

MTN's approach to human rights focuses on respect for human rights on an individual basis. Our focus is to ensure that digital human rights are not negatively impacted by our business activities and relationships.

Compliance with local and international regulations is a fundamental aspect of our operations. We uphold data protection laws, protect consumer rights and work diligently to meet all applicable legislation and guidelines. We endeavour to incorporate industry best practices into the development of our policies and business operations. Our commitment to human rights is robust and adaptable, addressing challenges such as the use of our services in conflict zones, threats to free and fair internet access and ethical issues concerning the use and implementation of AI.

1



Digital rights

MTN respects and protects customers' digital rights. This involves establishing policies, transparent processes and mechanisms to ensure freedom of expression while addressing privacy concerns.

2



Online safety

MTN is committed to protecting children from online threats like cyberbullying and inappropriate content. By collaborating with partners such as the IWF, working with law enforcement, raising awareness and educating parents, caregivers and children, we strive to ensure safer online experiences for children.

3



Privacy, security and protection

Privacy, security and protection are priorities across MTN's services and operations. These involve identifying risks related to the collection, retention and use of personal information as well as sensitive personal data. MTN adopts privacy-by-design and security-by-design principles; it has robust cybersecurity systems, conducts impact and risk assessments, and employs safeguards appropriate to the sensitivity of the user information held.

4



Freedom of expression

MTN recognises freedom of expression as a fundamental human right. We contribute to freedom of expression by empowering users to connect, share and express themselves.



Read more

Derived from Material Sustainability Issues for the Mobile Sector – 2023 update

Digital human rights in our operating markets continued

Digital human rights trends in 2024

1

Elections



2024 was a remarkable year for elections as voters in more than 60 countries went to the polls. It also became a challenging year for incumbents and traditional political parties. Rattled by rising prices, divided over cultural issues and dissatisfaction at the political status quo, voters in many countries sent a message of frustration.

Inflation was a significant issue in this year's elections, although economic concerns were prevalent in many countries before the post-pandemic wave of global price increases. The past two decades have seen financial crises, the COVID-19 economic downturn, inflation and ongoing economic inequality, all of which may have shaped the mood in nations around the globe.

Another issue that caused discontent is the broader frustration with the functioning of representative democracy. Across 31 nations surveyed in 2024, a median of 54% of adults were dissatisfied with the way democracy is working in their country.

Surveys by the Pew Research Centre have shown that many people feel disconnected from political leaders and institutions. The vast majority in many countries believe elected officials do not care about what people like them think. Many say there is no political party that represents their views well. Many people believe they have little or no influence on politics in their country.

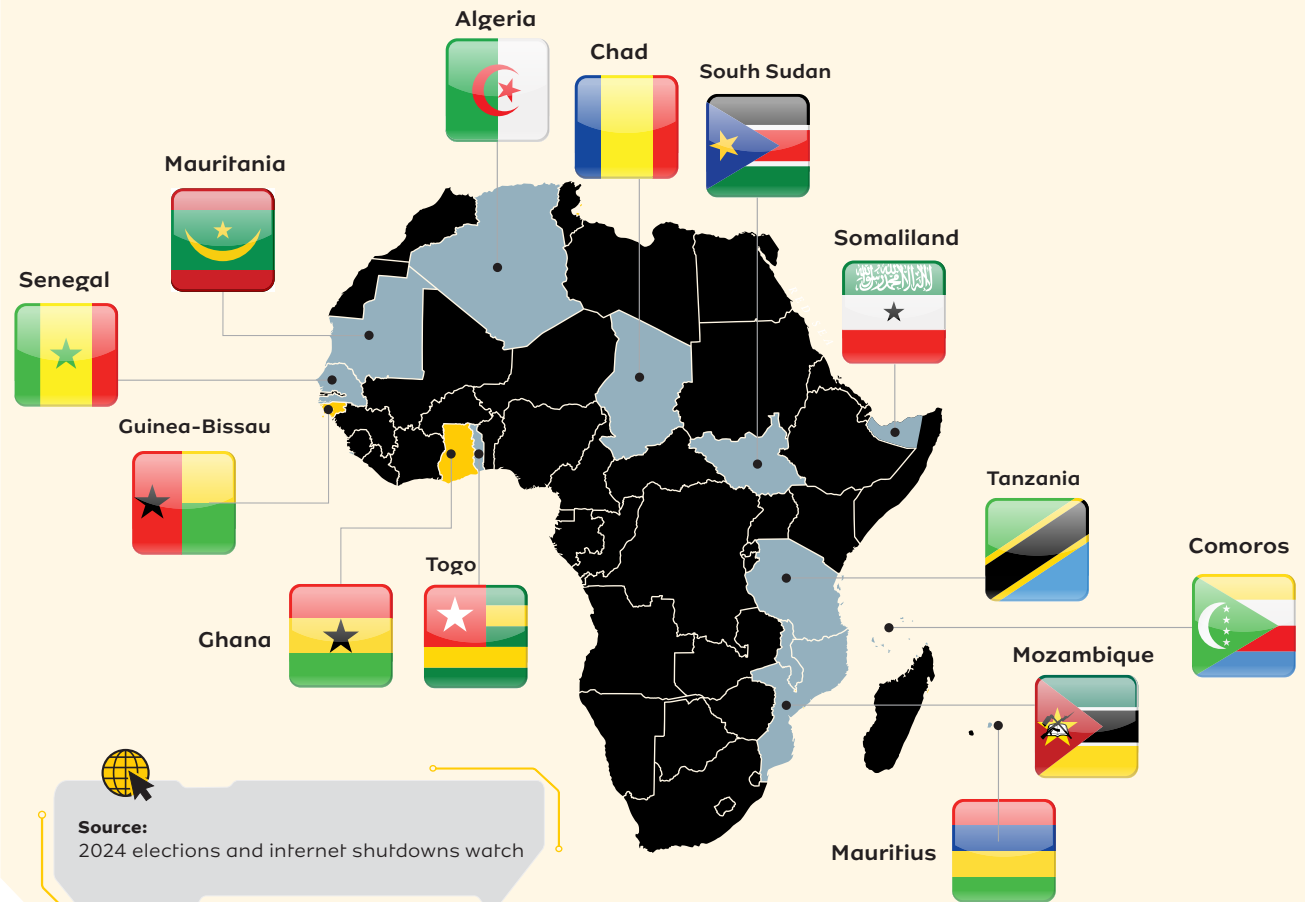
Frustrations with the political class have created opportunities for right-wing populists and other challengers to traditional parties and the political status quo. Several elections this year in Europe highlighted this trend.



Source:

Representative Democracy Remains a Popular Ideal, but People Around the World Are Critical of How It's Working

African election countries placed on the Access Now watch list in 2024



Digital human rights in our operating markets continued

2

Shutdowns



Geopolitical factors: Government service restriction orders and internet shutdowns

Geopolitical factors – including government requests, service restriction orders and internet shutdowns, conflicts and election-related issues – pose significant considerations for telecommunication companies, operating in diverse markets. MTN emphasises ethical operations, prioritising the respect for human rights and steering clear of involvement in activities that could fuel unrest or rights violations. This commitment involves proactive risk assessments conducted even before a crisis occurs, and a responsive approach entailing the formulation of specific policies, services and operational actions aimed at upholding human rights.

The global cost of internet shutdowns

Internet shutdowns bear significant financial consequences. In 2024, government-imposed internet shutdowns cost a staggering US\$7.69 billion, of which sub-Saharan Africa made up US\$1.5 billion. The financial implications for developing economies are significant.

Internet shutdowns and elections

Elections were a significant topic in 2024 as a total of 60 elections took place globally. While elections can drive change and bring positive outcomes, they are coupled with many challenges such as the spread of misinformation and disinformation. During election periods, telecommunications companies like MTN can play a crucial role in protecting human rights. At MTN, our human rights due diligence process, which is an integral part of our election readiness measures, is used to prevent and mitigate internet shutdowns and human rights harms during election periods.

A total of 17 African countries held elections in 2024, with 13 of these elections being identified on the Access Now watch list for being a high risk of imposing internet shutdowns during elections. Three of these elections took place in markets in which we operate, namely Ghana, Guinea-Bissau and South Sudan (of which South Sudan was postponed to 2026). In these countries, MTN ensured heightened human rights due diligence measures to contribute to free, fair and democratic elections.

Cost of global internet shutdowns

Region	Total cost US\$	Duration (hours)	Internet users affected
Europe	16.6 million	84	24.2 million
Asia	4.64 billion	48 807	331.3 million
Sub-Saharan Africa	1.56 billion	32 938	111.2 million
MENA	350.5 million	3 135	160.2 million
South America	1.12 billion	3 480	17.9 million
North America	1 million	343	3.5 million



Digital human rights in our operating markets continued

3

Rise of misinformation/ disinformation



In 2024, the World Economic Forum (WEF) highlighted the risk posed by misinformation and disinformation worldwide, listing it as the top global risk for the immediate term and up to the next two years.¹

The WEF highlighted that the concerns of the rising cost of living, combined with the risks of AI-driven misinformation and disinformation and societal polarisation, were a dominant risk outlook for 2024.¹ The WEF further noted that the nexus between falsified information and societal unrest are linked and took centre stage amid elections in several major economies.¹

According to the Africa Centre for Strategic Studies, disinformation campaigns have targeted every region of the continent. At least 39 African countries have been the target of a specific disinformation campaign.

Disinformation tends to be concentrated. Half of the countries subjected to disinformation have been targeted three or more times. Countries confronting disinformation typically face multiple disinformation actors. At times, these actors amplify one another's misleading narratives, while at others, they clash or stay in separate lanes.

African countries experiencing conflict are subject to much greater levels of disinformation highlighting the connection between instability and disinformation.

4

AI regulation



The interest in AI and, in particular, Generative AI (GenAI) has grown exponentially after the launch of ChatGPT in November 2022. Since then, many AI models and powerful platforms have been released, promising unprecedented technological advancements and transformative societal impacts. The significant development of AI impacts all industries, from healthcare and finance to transportation, entertainment/media and telecommunications.

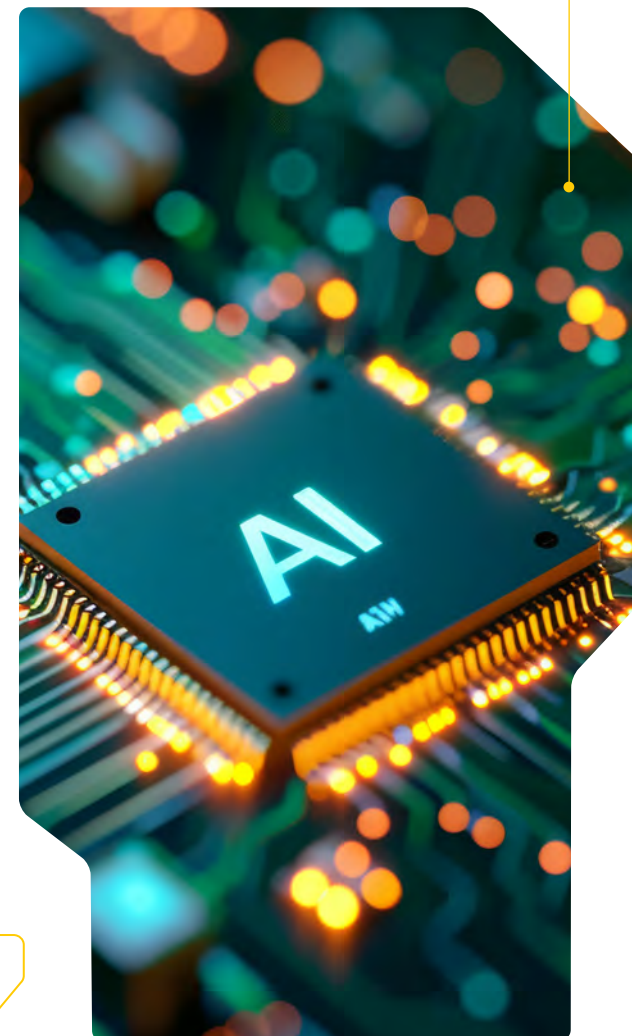
The ethical questions surrounding AI have evolved in parallel with AI technology and advancement in computing power and data security. In the early days, AI ethics was primarily concerned with the theoretical implications of machine intelligence, but with the advent of Machine Learning (ML) and Large Language Models (LLMs), the initial hypotheses have become much closer to reality.

As AI systems gain increasing autonomy and influence over critical domains (e.g. defence/cyber war and human health), the need for a robust, ethical framework to govern their development, deployment and operation becomes of critical importance.

For Africa, AI is a strategic asset pivotal to achieving the aspirations of Agenda 2063 and the SDGs. It promises to ignite new industries, fuel innovation and create high-value jobs while preserving and advancing African culture and integration.

In a landmark decision, the African Union Executive Council endorsed the Continental AI Strategy during its 45th Ordinary Session in Accra, Ghana, which was held from 18 to 19 July 2024. This strategy underscores Africa's commitment to an Africa-centric, development-focused approach to AI, promoting ethical, responsible and equitable practices.

Africa's AI and data privacy landscape is still maturing, with Ghana, South Africa and Rwanda releasing AI policies within MTN's footprint.



¹ Global Risks 2024: Disinformation Tops Global Risks 2024 as Environmental Threats Intensify > Press releases/World Economic Forum Mapping a Surge of Disinformation in Africa – Africa Centre.

Digital human rights in our operating markets continued

Trade-offs

Digital human rights is a complex topic that requires the acknowledgement and understanding of the challenges, risks and opportunities that influence our approach. The table below, therefore, explores the trade-offs that MTN encounters in our commitment to upholding digital human rights. In addition to the trade-offs, we also explore potential gains and mitigation measures to address the issues identified in the trade-offs. Through this, we reflect MTN's commitment to being a responsible corporate citizen. As MTN navigates these trade-offs, our commitment remains steadfast in upholding digital human rights, fostering responsible corporate citizenship and contributing to a secure and inclusive digital environment.

	Gains 	Trade-offs 	Mitigations 
Balancing privacy and security	Striking the right balance between ensuring user privacy and maintaining robust security measures.	Navigating the tension between user privacy and the necessity for stringent security measures.	Continuous refinement of encryption techniques, adherence to legal requirements and transparent communication about security measures.
AI and human rights	AI is a tool with great potential that can improve online protection of human rights.	AI can also be exploited by malicious parties, therefore it is associated with some risks that could lead to human rights infringements.	We have developed our robust Responsible AI Policy designed to guide us in the use and application of AI in our business operations.
Content moderation versus freedom of expression	Ensuring platforms are free from content that may cause harm, such as hate speech or misinformation.	Striking a balance between removing harmful content on our network in line with MTN policies and best practices, and respecting users' rights to freely express themselves.	Implementing robust content moderation policies, AI-driven tools and mechanisms for users to appeal content decisions.
Data retention periods	Recognising the operational necessity of retaining user data for various legitimate purposes, including service improvement and security.	Finding the optimal balance between the operational requirements of retaining data, respecting users' rights to privacy and complying with applicable laws.	In line with MTN's Data Privacy and Protection Policy, MTN may retain customers personal information for as long as required to provide customers with products and services or as otherwise permitted under applicable law. When we dispose of our customers personal information, we erase it or render it unreadable/anonymised.
Access to user information for law enforcement	Acknowledging the importance of providing necessary information to law enforcement agencies for criminal investigations and ensuring public safety.	Striking a delicate balance between fulfilling lawful requests from law enforcement and safeguarding the privacy rights of users.	Establishing clear protocols for lawful requests, minimising overreach and notifying users where there is a data breach.
Network neutrality versus traffic management	Upholding network neutrality principles ensures all online services are treated equally, preventing discriminatory practices that may favour certain content or service providers.	Addressing network congestion and ensure optimal service quality. This may require prioritising certain services or data traffic, potentially deviating from strict net neutrality principles.	Prioritising critical services such as emergency calls, and essential communication, to ensure they receive the necessary bandwidth and are not adversely affected by network congestion while avoiding discriminatory practices and ensuring fair access for all users.
User consent and data collection	Enhancing user experience by using embedded processes for seeking consent, enabling us to deliver services and provide tailored solutions that meet individual needs.	Ensuring user consent is informed, voluntary and transparent while minimising the collection of unnecessary data. This trade-off involves the tension between providing personalised services and safeguarding user privacy.	Clearly explaining data collection practices, providing opt-in/opt-out choices and minimising data collection to essential information.
Localisation versus global standards	Operating in diverse markets with varied legal frameworks requires MTN to comply with local laws, fostering smoother operations and better relationships with local authorities.	Developing policies that align with local legal requirements and cultural nuances, which may differ across jurisdictions. Striking this balance can be intricate and may involve compromises.	Developing policies that respect cultural and legal differences and actively participating in global conversations on human rights standards.
Collaboration with governments versus user advocacy	Advocating for user rights showcases a commitment to protecting user interests, privacy and freedom. It allows MTN to be a vocal advocate for principles aligned with human rights, even if they might differ from certain government perspectives. This approach allows MTN to have a seat at the table when policies are being shaped. It provides an opportunity to contribute industry expertise, align regulatory frameworks with business goals and proactively address potential challenges.	Engaging with governments often involves compromise and this trade-off is about navigating the delicate balance between aligning with regulatory requirements and advocating for user rights. There can be tension between adhering to governmental regulations and championing the rights of users, requiring careful negotiation.	Maintaining transparent dialogue with regulators, supporting user education and empowering users to understand and protect their rights.

Governance

MTN prioritises strong corporate governance, transparency and accountability as a commitment to long-term sustainable growth and creating value for our stakeholders. Good corporate governance is essential to our sustainability strategy through its ability to identify, assess and manage risks and opportunities related to digital human rights. By fostering a culture of transparency and accountability, we can build trust with our stakeholders and enhance our reputation.

Our digital human rights governance

Board oversight

Several of MTN's Board committees are responsible for ensuring digital human rights are carefully integrated into the Group's strategy and operations.

Executive Committee function

The Executive Committee is accountable for the execution of MTN's digital human rights strategy.



Our governance structure

We are committed to long-term sustainable growth and value creation for our stakeholders. Our governance framework provides the structure and guidance necessary to set objectives, monitor performance, manage risks and ensure ethical behaviour across our organisation. Good corporate governance is essential to our sustainability strategy through its ability to identify, assess and manage sustainability-related risks and opportunities. By fostering a culture of transparency and accountability, we can build trust with our stakeholders and enhance our reputation.

Our governance structure

Board

MTN Group Social, Ethics and Sustainability Committee (SESCO)

Reviews and approves

MTN Group Executive Committee
Meeting frequency: Monthly

Directs and recommends

Sustainability Steering Committee
Meeting frequency: Biannually

Integrates and escalates

Exco

Group Functional Sustainability Working Group

Management Committee

Advises and informs

Opco Sustainability Working Group
Meeting frequency: Monthly

Opco/platform

The Board is crucial in overseeing our strategy to ensure its effective execution. It aligns our operations with the SDGs while considering the unique needs of each stakeholder. By managing our sustainability efforts, the Board assists in mitigating risks, seizes opportunities and builds strong relationships with our stakeholders. This includes addressing risks and opportunities related to human rights. The Board is updated quarterly on management's efforts to reduce risk and deliver on our sustainability framework.

The composition of the Board is essential for guiding our strategy and setting the trajectory of key initiatives and goals. The Board operates through its committees that are responsible for monitoring specific areas as outlined in their terms of reference, allowing them to effectively carry out their mandates. Through these committees, various areas of MTN's operations and long-term objectives receive specialised, concentrated attention. They assess the business' operations to ensure the Board fulfils its oversight responsibilities with diligence and foresight.

The Social, Ethics and Sustainability Committee (SESCO) specifically oversees strategy, targets and progress relating to sustainability matters. Our committees are structured to promote collaboration across markets and functions, which is essential for ensuring that sustainability and human rights are embedded throughout the organisation.

Strategy

We monitor actual and potential impacts of risks and opportunities related to digital human rights on the organisation's business and strategy. We adjust and supplement our strategy accordingly to ensure its continued relevance and to achieve our strategic objectives.

Our approach to risks and opportunities related to digital human rights

➤ Digital human rights due diligence framework and policy

We have developed our strategy on human rights to reverberate our commitment to human rights and to ensure that we enhance the human rights of employees, customers, stakeholders and users in a positive way. Our policy aims to safeguard the rights of customers and stakeholders across our operational footprint.

➤ Responsible AI

The policy supplements our overarching approach to digital human rights and is targeted to ensure that MTN meets compliance and responsibility standards while embracing the advantages that AI brings to our operations.

➤ Data privacy and protection

Our policies and practices go beyond compliance and reflect MTN's commitment to safeguarding and promoting digital human rights to achieve a positive influence on our users and customers.

➤ Responsible mobile advertising and sales

Our approach highlights the importance of transparency and customer protection, while adhering to relevant laws and regulations.

Our strategy

As one of the leading telecommunications operators in Africa, MTN operates within a unique and dynamic environment shaped by a range of socioeconomic and environmental factors. Due to our geographic presence, we are challenged with specific regional ESG-related risks and opportunities, such as human rights violations, climate change impact and political instability. Our industry's diverse nature requires us to ensure our strategy remains resilient, robust and agile, enabling us to adapt to current and emerging ESG-related trends.

Our strategy is underpinned by four pillars: *doing for planet, doing for people, doing it right, and doing for growth*. This framework drives our business and fosters sustainable growth. These pillars are tailored to our operating context and business model to enable the opportunity to respond to current and emerging risks. Our strategic pillars steer our organisation through clear action plans and focus areas, engrained throughout our Group and Opcos. Our extensive experience in the ICT industry, coupled with our proactive stakeholder engagement, allows us to drive our strategy efficiently and effectively. Each sustainability pillar contains clearly defined focus areas informed by local and global ambitions.

Our sustainability efforts are supported by comprehensive policies and procedures that guide our markets with frequent benchmarking of international best practice to ensure we are aligned with evolving regulatory landscapes, geopolitical changes, and stakeholder expectations.

Our commitments

Metrics and actions

SDGs

Strategic intent

Ambition 2025:
Leading digital solutions for Africa's progress

Belief statement

Everybody deserves the benefits of a modern connected life



We are committed to protecting our planet and achieving Net Zero emissions by 2040



We are committed to driving digital and financial inclusion and a diverse society



We are committed to partners and stakeholders to create and protect value



We are committed to boosting inclusive economic growth on the continent

- **Project Zero:** Reduce GHG emissions.
- **Energy footprint:** Improve energy efficiency within our networks and deploy renewables.
- **Waste management:** Develop a circular economy and manage our waste.
- **Water management:** Reduce our impact through water conservation measures.
- Increase access and reduce cost to communicate.
- Increase financial inclusion.
- **Generational equality:** Increase women representation.
- **Contribution through ICT:** Digital education, skills and jobs.

- **Responsible policies and practices:** Business ethics and enterprise-wide risk management.
- Enhance reputation and trust with stakeholders.
- Promote digital human rights.
- Responsible procurement and supply chain practices.

- **Tax contributions across markets.**
- **Network infrastructure investment.**
- **Empower local governments and enterprises.**



Our strategy continued

Salient digital human rights issues

Human rights are fundamental rights. They are the foundation of a just and equitable society. To uphold the human rights of our customers, stakeholders, users and all those affected by our business activities, the protection of human rights is woven into the fabric of our organisation. Our strategy centres on human rights in the digital environment where the potential for human rights infringements is most prevalent. We have developed a robust policy structure to protect and promote the human rights of those who engage on our platforms, networks and services.

Overview of the digital human rights strategy

Vision

As we drive inclusion, we remain committed to protecting and promoting the rights of our customers and stakeholders across our footprint

Governance



- Standard operating procedure
- Scenarios playbook
- Decision matrix

Strategy



- Digital Human Rights Policy
- Responsible AI Policy
- Data Privacy and Protection Policy

Risk management



- Impact assessments
- Advocacy opportunities
- Capacity building of stakeholders
- Strategic memberships

Targets and metrics



- Transparency reporting
- Independent external assessments

Protect, Respect and Remedy through effective and meaningful human rights due diligence

Our digital human rights framework

MTN's digital human rights framework is a key strategic framework based on the guiding principles that are also embedded in our Digital Human Rights Policy, namely protect, respect and remedy. By focusing on rights and incident management, impact management, responsible advocacy and disclosure and performance management, our framework has a clear and structured approach, highlighting our steadfast commitment to protecting human rights. The framework is further strategically aligned with our **Ambition 2025** strategy, which ensures key focus areas, such as human rights, are integrated into our business strategy.

The framework emphasises that protecting human rights is a collective responsibility at MTN as a Group-wide approach that relies on the entire business and utilises its collective strengths. The digital human rights strategy further includes governance mechanisms such as standard operating procedures, scenario playbooks, decision matrices, advocacy opportunities, capacity building for stakeholders, strategic memberships, impact assessments, risk management, transparency reporting, rankings of digital rights, disclosures, and performance management.

The sustainability governance and reporting structure – encompassing the Group Social, Ethics and Sustainability Committee, the Group Executive Committee, the Group President and CEO and the Group Chief Sustainability and Corporate Affairs Officer – is confirmation of MTN's commitment to regular reporting and oversight, promoting transparency. This commitment extends to the MTN Digital Human Rights Policy, which aims to protect the rights of customers and stakeholders across our operational footprint.

Our strategy continued

MTN Digital Human Rights Policy

Our Digital Human Rights Policy is fundamental as it safeguards the rights of our customers and stakeholders, while promoting positive impacts for them. These impacts include promoting freedom of expression, enhanced data and user privacy and uncompromised rights protections. These positive effects allow us to build trust and confidence with our customers and stakeholders.

The Digital Human Rights Policy strives to protect and uphold the fundamental rights of internet access, freedom of expression, privacy and information security. This is paramount for MTN, as we aim to enable users to exercise their fundamental rights in an inclusive and safe digital environment. Our Digital Human Rights Policy applies to our directors, officers, employees and representatives whether they are permanent, temporary or on contract. The policy is further applied to external parties, including suppliers, agents, business partners and intermediaries. By using our policy across an expansive set of stakeholders, we have ensured a concentrated effort to mitigate risks associated with the human rights infringements.

Our policy is rooted in the foundation of protecting human rights in the face of growing risks in the digital space. We want to emphasise through our policy that protecting human rights should be a positive experience leading to positive outcomes for our customers and users through which they can enjoy their fundamental human rights, such as the right to freedom of expression and privacy. To achieve this, the policy contains essential digital human rights principles such as respecting the rights of all, the right for all people to use digital communication services freely, accessing information, and building and fostering a trusting relationship between MTN and its customers.

Through a strong policy foundation and frequent efforts, we aim to ensure the policy and its application remain updated and relevant. Our approach to dealing with challenges posed in the digital human rights landscape remains agile. In this regard, we have developed specialised policies dealing with responsible AI and data privacy and protection, which serve as tailored extensions of our digital human rights strategy on specific topics. We realise the importance of having an overarching approach to digital human rights that is supplemented by a targeted approach in dealing with specific developments and how they may impact human rights.

United Nations Guiding Principles on Business and Human Rights

Protect

States have a duty to protect against human rights abuses by third parties, including businesses.

Enforcement measure

Implement effective national laws and regulations to prevent human rights abuses.

Respect

The business has a responsibility to respect human rights through their operations.

Enforcement measure

Conduct human rights due diligence to identify, prevent, mitigate and account for potential impacts.

Remedy

Access to effective remedies for those affected by business-related human rights abuses.

Enforcement measure

Promote access to justice and effective remedies for victims.

Digital human rights due diligence framework

Complying with legislative requirements:

Regulatory compliance is the utmost priority for MTN as non-compliance with regulatory frameworks may lead to fines, sanctions and even licence revocation, posing significant risks to our continued business operations. MTN therefore conducts its business within the confines of the applicable local legal and regulatory frameworks in accordance with the different jurisdictions in which we operate. In addition to strict adherence to local laws and regulations, we also focus on protecting the right to privacy and freedom of expression of our customers as infringements of these rights pose further risks to our business and reputation. Accordingly, we conduct business with the following objectives in mind:

- Protecting our customers' rights to access information and express themselves online.
- Ensuring good data governance.
- Providing secure communication services in the jurisdictions of our markets.

Requests received from authorities, such as data requests and network suspension or shutdown requests, can pose human rights risks if they are either denied or approved. Therefore, MTN meticulously evaluates each request and considers legal validity, necessity and proportionality in line with international and local human rights laws. These requests can be for user data and information related to network and service interruptions.



Compliance considerations:

- Adherence to a lawful request by an authorised public body, in accordance with governing legislation.
- Support for regulatory proceedings conducted by a competent authority.
- Compliance with lawful purposes related to licence and regulatory obligations.

MTN recognises the inherent risks to our operations when implementing or adhering to instructions of this nature from competent authorities. These risks include potential human rights violations and security threats to our personnel, facilities and infrastructure. Additionally, we are exposed to risks related to legal challenges, damage to our reputation and public criticism. We are committed to taking proactive steps to mitigate these risks, protecting our values and preserving our standing as a responsible corporate entity.



Digital human rights due diligence framework continued

Our digital human rights due diligence process approach

Management process

Description

Mitigating actions

1 Before Proactive management

- **Evaluating risks and impact:** Quarterly reviews are conducted on digital human rights risks and mitigation plans.
- **Risk categorisation:** Risks are categorised according to severity, the seriousness or effect of the impact on the victim(s), the remediability of the impact and the likelihood of occurrence.
- **Annual assessments:** Detailed digital human rights assessments are conducted annually.
- **Investments/acquisitions/partnerships:** Digital human rights impact assessments are used for all strategic and high-risk investments, acquisitions and partnerships, either at the planning or contract stage.

- **Engaging stakeholders:** Ongoing engagements with stakeholder on digital human rights and related matters.

2 During Proactive management

- **Managing requests or incidents:** MTN adopts a considered approach in determining its response to requests from authorities and non-governmental entities. This includes:
 - > Evaluating requests that may impact freedom of expression, access to information or customer privacy, assessing the regulatory authorisation of the requesting entities and ensuring compliance with prevailing regulatory processes.
 - > Engaging with relevant stakeholders for guidance before responding to requests, seeking clarification, requesting amendments or urging the dismissal of requests where possible. Requests are reviewed in accordance with the laws and regulatory requirements of the countries of operation, considering international laws as well.
 - > Assessing potential risks to employee safety and operational continuity before deciding to reject, or partially or fully comply with the request. The decision is based on due diligence, regulatory and risk management principles and the laws of the relevant country.

- **Mitigating the impact of disruptions:** MTN communicates with affected parties based on applicable law to safeguard employees, customers and partners. We also ensure the integrity of our infrastructure is maintained during disruptions.

3 After Post-incident management

- **Reflections:** An understanding of the incident and lessons learnt, to be better prepared for or mitigate the impact of future incidents.

- **Situational stakeholder engagement:** MTN actively engages with various stakeholders to gather perspectives, identify potential mitigations and manage situations effectively. Grievances can be reported through in-country customer complaints lines or via email to humanrights@mtn.com.



Responsible AI

Our targeted approach: Responsible AI

AI is a rapidly evolving field of technology that affects the business landscape and society in a number of ways. AI has the potential to impact the fundamental human rights of our customers, such as their right to privacy and freedom of expression. MTN is also aware of AI's advantages for businesses, our users and our customers. MTN's ambition is not to automate the entire business, but rather for its employees to be skilled in the use of AI to extract its advantages. The goal for MTN is not to replace humans with AI, but rather for AI to supplement and support humans. We have developed a Responsible AI Policy to ensure the ethical use and application of AI that respects the rights and freedoms of our customers, employees and all parties with whom we engage with. The policy allows MTN to continue using innovative technology in its business, in a responsible manner that ensures our employees and customers have a positive experience. The policy will be rolled out through training initiatives, awareness and communication campaigns, and socialisation plans.

The MTN Responsible AI Policy is not a standalone policy but is part of a holistic suite of policies, articulating the fundamental principles and pillars for adopting AI. The policy is based on the BRAIN (balance, responsibility, awareness, integrity, nurturing) principles, with the purpose of ensuring safe, reliable and ethical AI tools and mechanisms aligned with global best practices and standards. The BRAIN principles were developed by gathering comprehensive internal and external input and can be interpreted according to the specific functions of each department.

The BRAIN model is the functional arm of the Responsible AI Policy and seeks to address three themes, namely rolling out AI responsibly, using AI responsibly and ensuring a positive impact for internal and external customers when engaging with AI products and services.

MTN's Responsible AI Policy in its current form is meant to act as our foundation for the application of AI in our business in future. As AI continues to develop, our policy will evolve along with the latest AI advances to ensure that it remains operationally and strategically relevant.

Principles for Responsible AI

(B)alance: Promotes a balanced approach between innovation and safety in the development and use of AI.

(R)esponsibility: Ensures accountability for AI decisions and actions, emphasising responsible development and deployment.

(A)wareness: Increases awareness of AI capabilities and limitations among stakeholders to foster informed usage and expectations.

(I)ntegrity: Maintains high ethical standards and integrity in all AI operations, ensuring that AI systems operate transparently and fairly.

(N)urturing: Supports a culture of continuous learning and improvement in AI safety and ethics, nurturing a positive relationship between AI and society.

The responsible use of AI requires the consideration of ethics, which demands that MTN meets compliance and responsibility standards while also building trust, safeguarding its reputation and driving sustainable growth. By incorporating ethics into our Responsible AI approach, we protect stakeholders, uphold our core values and continue to build a fair, inclusive and responsible future. The BRAIN framework, together with our AI playbook — which was developed based on all of MTN's policies, values and practices — guide us in what is considered ethical within the AI realm.



Data privacy and protection

Our targeted approach: Data privacy and protection

Data privacy and protection are fundamental to MTN's operations. At MTN, data privacy is not merely a matter of compliance; it is ingrained in how we do business. This commitment is central to safeguarding the right to privacy for all our stakeholders. By embedding these principles, we build trust and confidence among customers and stakeholders, cementing our position as a responsible service provider with robust measures to protect personal information. This trust also serves as a competitive advantage, elevating MTN as a champion for responsible data management.

Our journey began with recognising the need to overhaul and strengthen MTN's data privacy policies, processes and practices. This realisation paved the way for **Project Guardian**, a transformative initiative that laid the foundation for a data privacy and protection programme underpinned by 12 key data privacy components. Rooted in international best practices, the programme covers critical topics such as accountability, transparency, data minimisation, security, integrity and data subject rights. The revised policy applies across all operations and demands compliance with high standards, even where there is no

local legislation. Tools and frameworks are in place to hold partners accountable and safeguard customer data, ensuring alignment with MTN's high standards.

The transition from project to business-as-usual has been marked by significant milestones:

Comprehensive programme rollout: Following the enhancement of the policy, it was implemented across all operating markets. This implementation included 45 data privacy framework touchpoints, 19 procedure chapters and several template controls to ensure an end-to-end spectrum of data privacy management.

Training and socialisation: Data privacy awareness was integrated into our culture through 54 initial socialisation sessions covering 14 topics and 28 follow-up sessions. The policy was further supported by e-learning, training comprising five different modules, with management accountability for course completion.

Governance and accountability: In each operating market, a data privacy officer has been appointed to drive the implementation of the data privacy programme.

Where applicable, these individuals have been registered with the relevant local authority. To ensure embedment, data privacy champions have been appointed across all departments. These champions support the local data privacy offices to embed data privacy principles and controls into business operations. Our governance is strengthened by regular top-down and bottom-up engagement, including quarterly senior management meetings to address escalations, challenges and opportunities.

This transition into a day-to-day data privacy and protection programme reflects MTN's ongoing commitment to data privacy management as a continuous journey rather than a destination. By embedding adaptability into our programme, we ensure resilience in the face of evolving technology, legislation and customer expectations. Our focus remains on maintaining alignment with international best practices and exceeding stakeholder expectations to safeguard privacy rights.



Nigerian national identification law compliance

CASE STUDY

Overview

The Federal Government of Nigeria issued a directive requiring all active mobile subscribers to link their lines to verified National Identification Numbers (NINs). This policy was introduced due to the rise in insurgency, kidnappings and national security issues, as such the Federal Government of Nigeria has mandated that every Nigerian subscriber must obtain a NIN and link it to their Mobile Station International Subscriber Directory Number (MSISDN) — a unique number used to identify a mobile phone number in a network and the identity of the owner of the line — or be barred from accessing the telecommunications networks. In compliance with the Nigerian Communications Commission's (NCC) directive, mobile subscribers without a valid NIN currently have their services restricted until they comply with the requirement.



MTN Nigeria is committed to upholding human rights while ensuring compliance with local laws and regulations.

MTN's response

In response to the NCC's directive, MTN has:

- Complied with the policy directive and worked with the NCC to ensure a smooth implementation of the NIN requirement.
- Deployed sensitisation material across various media platforms to encourage subscribers to register and link their NIN to restore suspended services and access new ones.
- Maintained reliable services for customers while aligning with regulatory requirements.

Outlook

MTN will continue to support customers in meeting the NIN requirements by facilitating the registration process in line with regulatory expectations and engaging with regulators to ensure a balanced approach between compliance, security and service delivery.



Responsible mobile advertising and sales

Responsible mobile advertising and sales

At MTN, we uphold responsible mobile advertising practices to create a positive and meaningful experience for our customers. We recognise the vital role of mobile advertising in engaging with audiences while maintaining a firm commitment to respecting human rights and data privacy. Our approach is rooted in transparency, customer protection and adherence to local laws and regulations across our markets.

MTN ensures that the advertising content delivered on its platforms is responsible, relevant and respectful. We are committed to the following:

Customer privacy protection: Adhering to data protection regulations, we ensure that customer data is handled ethically and legally.

Content standards and regulatory compliance: All advertising content undergoes an approval process to ensure compliance with national and international advertising laws. This process protects against harmful or inappropriate content, particularly for children and

vulnerable groups, and aligns with prevailing advertising codes of conduct.

Protection from discrimination: MTN's advertising framework prohibits content that promotes discrimination based on race, ethnicity, religion, gender, or political affiliation. Our approach ensures that all advertising aligns with local cultural sensitivities and legal standards.

MTN remains strictly neutral and apolitical in all its operations. While we provide telecommunications services to both public and private sector entities, including political organisations, our role is solely to facilitate lawful communication services.

We do not engage in or support any political messaging nor do we allow political advertising on our platforms. Our strict policies ensure that our services are used responsibly and in compliance with all applicable laws.

As a responsible corporate citizen, MTN adheres to all relevant content regulations and advertising standards in each of our operating markets. Our mobile advertising practices are

governed by clear frameworks that ensure compliance with national communications laws, ethical obligations and data privacy standards. We remain committed to transparency and accountability in all aspects of our mobile advertising operations.

In line with these commitments, we work closely with regulatory authorities to ensure that our advertising services meet the highest ethical and legal standards. If any concerns arise, we are prepared to co-operate fully with relevant authorities to uphold our responsibilities and protect our customers.

Through these guiding principles, we continue to offer a secure, transparent, and responsible mobile advertising experience that respects user rights while enabling brands and enterprises to engage effectively with their audiences.



Stakeholders and policies

Policies and positions	Customers	Employees	Procurement	Government/ Regulators
Data privacy and protection The Data Privacy and Protection Policy clearly articulates our commitment to data privacy and protecting our stakeholders. We comply with applicable data protection laws when collecting, processing, storing and disclosing personal information. This commitment is part of a comprehensive privacy and data protection initiative at MTN, aligning with internationally recognised standards on corporate governance. To support internal compliance monitoring, an information officer and a deputy information officer have been appointed to guide data privacy and protection and to establish clear procedures for reporting breaches of personal information.	✓	✓	✓	
Zero rating MTN's approach to zero rating content demonstrates our support for balancing business considerations with the core principles of inclusivity and accessibility.	✓			✓
Information security MTN is dedicated to enhancing information security across all our operations. We achieve this through strict adherence to the MTN Group Information Security Policy. This policy outlines the necessary measures for safeguarding MTN's information, systems and personnel, drawing guidance from industry-leading practices like the NIST Cybersecurity Framework and ISO/IEC 27001:2013.	✓	✓	✓	
Responsible use of AI and algorithms Our use of AI and algorithms is guided by our Responsible AI Policy. This ensures the necessary guardrails are in place and that the use and application of these technologies are responsible and ethical. Through our policy, we are guided to ensure that we have positive impacts on our customers and users and that their digital human rights are protected.	✓	✓		
Treating customers fairly MTN delivers an exceptional customer experience by prioritising and fulfilling customer needs and expectations. This extends to protecting customers and ensuring fairness during interactions with our products and services. To uphold these principles, we have established a comprehensive policy and framework designed to ensure equitable treatment for our customers, promoting transparency and empowering them.	✓			
Responsible marketing and advertising MTN has established a Responsible Marketing Policy. This policy serves as a guiding framework to ensure our marketing efforts are accurate, appropriate and inclusive. In compliance with global standards and legal requirements in each of our markets, we strive for ethical marketing practices across various media platforms, promoting transparency and avoiding content that may incite violence, discrimination or harmful stereotypes. Our policy extends to interactions with third parties and the handling of personal data. This policy is communicated comprehensively to employees and partners, reinforcing a culture of responsible marketing within the Group.	✓			
Responsible mobile advertising and sales Our Responsible Advertising Sales Policy has been tailored to protect MTN users and customers while safeguarding the reputation of the MTN brand. This is achieved by preventing unsolicited targeted advertising that may offend minorities or be deemed defamatory or obscene, and we ensure alignment with local customs and cultural relevance. Additionally, we ensure that our platform for targeted advertising is in compliance with local and international laws and regulations, including the responsible access and use of first-party customer data.	✓			
Responsible supply chain The Supplier Code of Conduct sets out our approach to driving sustainable business practices and aims for the highest ethical conduct. It outlines our commitment to respect and promote human rights and fair labour practices, including equal opportunities, an environmentally sustainable business and zero tolerance for bribery and corruption.			✓	
Whistle-blowing Policy MTN has a zero-tolerance approach to fraud, bribery, corruption, theft and illegal activities. The Group has established procedures for safe and anonymous reporting of any fraudulent or illicit behaviour by employees and other stakeholders. Whistle-blowing is viewed as a positive practice that aids in promptly identifying misconduct, thereby enabling MTN to mitigate financial and reputational risks. We encourage employees to report fraud, bribery, corruption or misappropriation through established reporting mechanisms, assuring protection from retaliation for those reporting incidents in good faith and without malice.		✓	✓	

Stakeholders and policies continued

Policies and positions	Customers	Employees	Procurement	Government/ Regulators
Code of Conduct MTN's Code of Conduct sets the tone regarding the company and its employees' ethical conduct. Our values lead to success and underpin our relationships and trust with employees, customers, business partners, shareholders, communities and society. Our Code of Conduct emphasises our commitment to ethical operations. It demonstrates the standards of conduct to be met by individuals employed by MTN or entities engaged in business with MTN. We have set out these core business principles to ensure that we understand what is expected from our employees and partners.		✓		
Fair labour practices We are committed to responsible labour practices across our footprint. Our approach is consistent with internationally recognised principles, while ensuring that MTN remains compliant with the terms of our various jurisdictional obligations and licence conditions.		✓	✓	
Occupational health and safety MTN is committed to achieving world-class occupational health and safety standards that support the company's practices and business objectives. We are committed to creating a safe working environment, as far as reasonably practicable, for all employees, customers and stakeholders. Our OHS Framework and policy are developed based on ISO 45001, International Labour Organization (ILO) standards and South African legislation and standards.		✓	✓	
Political contributions MTN is dedicated to transparent and responsible engagement in political party funding, supporting stable democracies and digital human rights across our markets. This commitment is outlined in the Group's Political Contributions Policy, which prioritises transparency, accountability and responsible engagement. The policy establishes explicit guidelines to mitigate potential risks, emphasising adherence to international standards while committing to operate within legal and ethical boundaries. The policy recognises key risks, such as reputational damage, legal consequences and erosion of trust. It serves as a safeguard by providing a principled framework for political engagement. This approach aligns with our broader commitment to fostering stable democracies and preserving digital human rights throughout our markets.				✓



In-kind contributions to political parties in South Africa

CASE STUDY

Overview

The 2024 general elections in South Africa were a pivotal moment for the country's democratic process, highlighting the importance of free, fair and transparent elections. The Political Party Funding Act 6 of 2018, which came into operation in April 2021, mandates political parties to disclose donations exceeding R100 000 to the Independent Electoral Commission (IEC) to ensure transparency in political funding.

Ahead of the 2024 elections, we made in-kind donations to the African National Congress (ANC) and the Economic Freedom Fighters (EFF). These donations, valued at R515 313, included SIM cards, WiFi routers, data, minutes and bulk SMS services, designed to support election-related communication and activities. Such contributions play a key role in enabling political parties to effectively engage with voters and ensure the smooth functioning of the election process.



As part of our commitment to transparency, MTN publicly disclosed these donations to the IEC in compliance with the law.

MTN's response

MTN, a South African company founded at the beginning of democracy, is committed to maintaining the highest standards of corporate governance and transparency in all our operations. We believe that it is crucial to support multiparty political systems and the stability of democracies in the countries where we operate. We also understand that political parties need resources to fulfil their important democratic purpose.

Guided by local legislation in each of our markets and by our Group Political Contributions Policy, we do not make cash donations to political parties. Instead, as a company, we make in-kind donations in the form of goods and services in the ordinary course of business. Donations are made to political parties that submit formal written requests to the company. In the case of South Africa's recent general elections, MTN received two formal written requests from the ANC and the EFF. Our in-kind donations

to these two political parties included SIM cards, WiFi routers for stadium VVIP, VIP and media lounges, as well as data, minutes and bulk SMSs.

These donations were aimed at ensuring that political parties had the necessary tools to engage with the electorate and facilitate the democratic process. As part of our commitment to transparency, MTN publicly disclosed these donations to the IEC in compliance with the law.

Outlook

Moving forward, we will continue to ensure compliance with the laws of the countries we operate in and consistently implement our Group Political Contributions Policy. Our approach to political contributions will remain transparent and neutral, focused on supporting the democratic process. We will continue to provide essential resources, such as communication tools, to assist with election activities while adhering to the legal frameworks governing political donations.



Child online protection

MTN's commitment to child online protection

Continuous technological advances mean children are becoming more connected and engaged online at increasingly younger ages, which heightens their vulnerability and susceptibility to exploitation and harm. Due to the growing exposure to online threats, it is paramount to make maximum efforts to protect children ensuring they have a safe online environment. Our comprehensive child online protection programme works seamlessly across all levels of the business, down to the operations level, helping create a safer online space for children.

The following are objectives of the programme:

- **Empowerment:**
To empower young people, including children, to become online safety champions and ambassadors.
- **Awareness:**
To raise awareness of child online safety and the reporting processes to encourage the use of reporting portals.
- **Knowledge:**
To build knowledge and awareness based on evidence-based research to support the development of online safety awareness across the continent.
- **Capacity:**
To develop the capacity of caregivers, educators and law enforcement through training and positively impact policy through advocacy roundtables.
- **Blocking child sexual abuse material (CSAM) content:**
To raise awareness about our MTN-IWF* portal to flag and block all content related to child sexual abuse material.

Demonstrating impact through IWF

Child online protection requires a holistic focus on multiple facets to provide optimal safety for children. MTN recognises this and implements a robust and comprehensive approach to child online protection. We have been a top-level member of IWF since 2019, which exemplifies our commitment to child online protection. Our strategic partnership with IWF provides us with advantages, as IWF offers services such as the CSAM URL blocking list, which we have implemented across our operational footprint.

MTN and AdaptiveMobile partnership

URLs deemed potentially harmful and inappropriate to users are identified through our adaptive system which blocks the identified URLs. This robust system analyses the unique characteristics of each market, making it a reliable and efficient mechanism to identify and remove harmful content, acting as an effective filter. At the core

of the filtering mechanism is the IWF feed that updates our system daily with a list of URLs. This list catalogues information about websites known to host CSAM and other illicit content. Through our strategic collaboration with AdaptiveMobile, we can block these URLs, thereby proactively protecting our users from potentially harmful content.

MTN notes that the data published for the IWF* mobile blocking activities has been limited in the 2024 iteration of the Transparency Report. This is due to the modernisation of the Bayobab network equipment, which has been our partner in collecting this specific data. Furthermore, as a result of the increased capacity to meet the market demand, Bayobab's network hardware in Europe and the UK have been replaced over the past year.

However, as the operations capabilities currently only store data for up to one month, the only statistics available are for those from the

first quarter of 2024, which were collected prior to the changes. We are currently in the process of ensuring that the statistics captured by our operations are accessible for future publication purposes.

MTN and AdaptiveMobile's blocking activities	Q1 2024	2023	2022	2023
Number of URLs inspected (million)	129	656	145	174
Number of URLs blocked (million)	0.87	1	0.7	0.3
Blocking rate (%)	0.67	0.17	0.46	0.15
Number of URLs blocked per day	9 600	3 000	1 800	700



* About IWF

The IWF is a non-profit organisation dedicated to protecting children online. With a history spanning more than 27 years, the organisation provides a secure way for people to report child sexual abuse imagery anonymously – available in more than 50 countries. The community includes more than 190 global technology companies committed to this cause. Highly trained analysts within the organisation assess public reports and take proactive steps to make the internet safer for everyone.

Help Children be Children research

CASE STUDY

Overview

Currently, there is limited understanding of how children engage with digital technology in countries across the globe and especially on the African continent. Furthermore, there is little evidence on what forms of online abuse children experience, which groups of children are more vulnerable, who the common offenders are, and whether children know how to recognise and report online abuse.

You strip away their childhood when you watch child sexual abuse imagery online.

Help children be children.
Report online child sexual abuse imagery, anonymously, at [mtn.com/child-online-protection/](https://www.mtn.com/child-online-protection/)

MTN

Ipsos

In maintaining our efforts adequately address the issue of child safety online, everything we do needs to be data driven, as we cannot comprehensively address the problem without the data indicating where our resources should be focused.

MTN's response

The Help Children Be Children report is a comprehensive analysis that highlights the challenges and risks children face online, including cyberbullying, exposure to inappropriate content, and privacy concerns. The report draws on extensive research conducted in collaboration with child safety experts, educators and parents across Nigeria and presents vital insights into children's online behaviours and their perceptions of safety in the digital space.

The report reveals alarming statistics about children's internet usage in Nigeria, indicating that more than 70% of children aged 6 to 12 have access to the internet. This access creates opportunities for learning and social interaction but also exposes them to potential risks such as cyberbullying, inappropriate content, and online predators.

Another key finding of the report is that a significant number of children are unaware of basic online safety practices. This lack of awareness can make them vulnerable to various forms of online exploitation. To combat this issue, the report recommends the importance of education and awareness campaigns tailored specifically for children, parents, and educators.

This has triggered initiatives within the Nigerian operating market advocating for stronger regulatory frameworks that protect children from online threats. We will continue to engage with communities through outreach programmes designed to raise awareness about online safety issues.

For more on the reports commissioned by us, please see <https://www.mtn.com/child-online-protection/>

We deemed it prudent to contribute to the growing work on online safety by conducting research that explores the prevalence of online child abuse and exploitation, the modalities, and the possible gaps that may be hindering child online safety. Accordingly, we commissioned research that was concluded by Ipsos on child online behaviour in Nigeria, Zambia and South Sudan.

Outlook

The data received from these commissioned reports informs MTN's continued efforts to keep children safe online.

We are dedicated to educating children, parents, teachers, and caregivers on responsible digital technology use to ensure children's online safety.



Risk management

Integrating risks related to human rights into our risk management framework ensures a comprehensive and market-specific approach to risk management and is part of our overall enterprise risk management (ERM) system.

Our management approach

➤ Digital human rights impact assessments

We conduct continuous assessments of our human rights impacts using our digital human rights impact assessment and toolkit to ensure we keep an eye on emerging developments and report on these in a transparent manner.

➤ Collaborating with partners and stakeholders

MTN is a member of various bodies that allow us to gain insight to further our efforts to uphold our focus on digital human rights. Our engagements with stakeholders showcase our commitment to strengthening our relationships and learning from our peers.

➤ Transparency and ranking digital rights

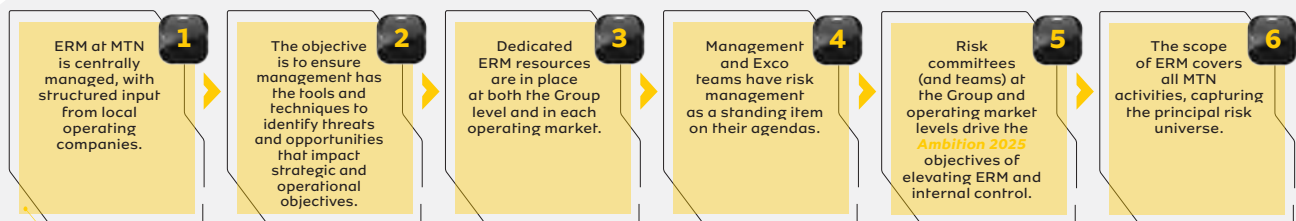
MTN is a member of the Global Network Initiative, which enables us to gain insights and recommendations for protecting the freedom of expression and privacy rights of our customers.

Risk management

ERM

Risk management is a structured process involving management and the Board. It supports MTN's objectives by identifying and mitigating risks with potential impacts. MTN relies upon its Group-level risk management framework, which is applied through a human rights lens to identify, prioritise and manage human rights risks to the business. This encompasses risks concerning MTN's impact on human rights, digital human rights strategy and application, and the development of emerging risks. Human rights risks are centred on the probability of our business infringing on the human rights of people, thereby causing harm. We apply a three-pronged approach consisting of protect, respect and remedy, which places the obligation on us as a business to firstly protect human rights and then respect rights. Lastly, in instances where human rights have been infringed upon as a result of our business activities, we aim to remedy that infringement. Where we have identified human rights risks, these risks are included in our digital human rights risk register, which documents mitigation and remedy measures, as well as the accountable party within our business responsible for managing the risk.

The ERM process is one facet of our wider risk approach to managing and mitigating risks related to digital human rights, which is further strengthened by our human rights due diligence framework.

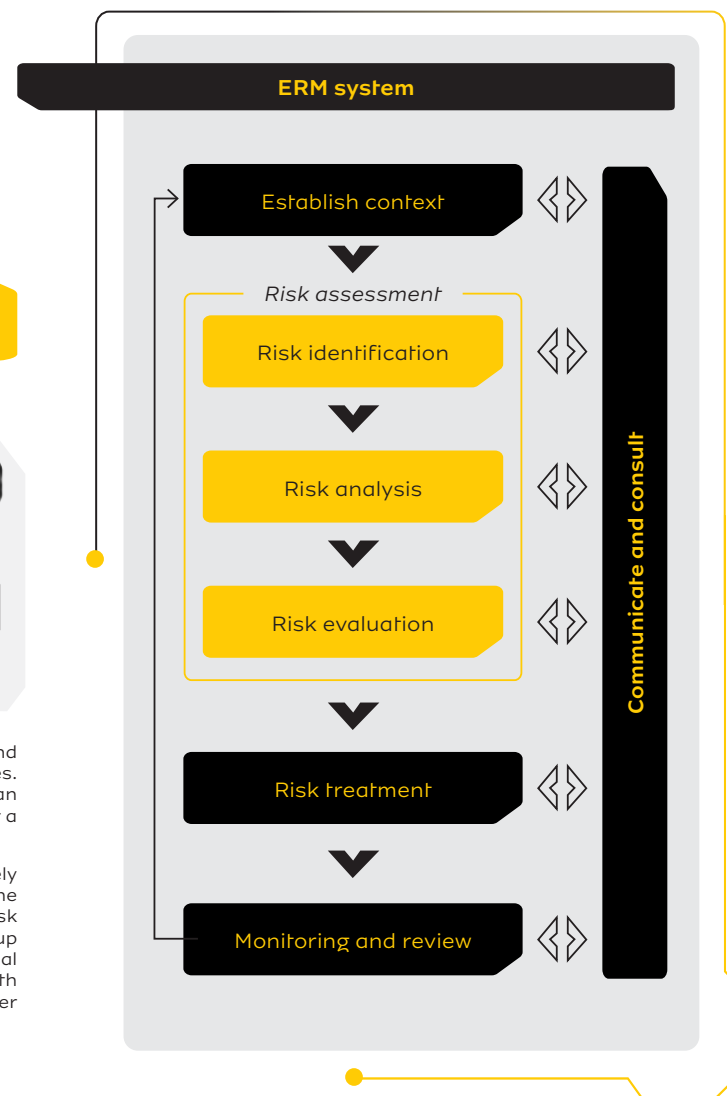


ERM process

Integrating risks related to human rights within our ERM framework ensures a comprehensive and market-specific approach to risk management. Our ERM process encompasses four main phases:

- 1. Establishing the context:** We begin by understanding the activities and context of the business, considering internal and external environments that impact MTN's ability to achieve its objectives.
- 2. Risk assessment:** This phase involves identifying risks that could impact our objectives, analysing their probability and impact, and updating the risk register accordingly. It also includes evaluating the aggregated impact of risks against predetermined criteria to prioritise treatment actions, with key risk indicators acting as early warning measures. Risk tolerance levels, established by Exco and approved by the Group Board, guide decision making. Operating markets can implement tailored risk tolerance limits in consultation with the Risk and Compliance department or management.

- 3. Risk treatment:** This phase involves developing responses and specific action plans for identified risks and opportunities. A risk response strategy is formulated for each risk, which can be achieved through implementing preventative measures, or a combination of detective and corrective measures.
- 4. Monitoring and review:** This ensures that risks are appropriately tracked, escalated in a timely manner and reported to the appropriate levels within our governance structure. The risk level reflects the magnitude of the residual risk in a group context. Risk levels are determined by assessing the residual risk rating and the size of the operating market. Risks with regional and group-wide impact are being escalated to higher management.



Risk assessment in South Africa

CASE STUDY

Overview

A key component of our human rights due diligence process is the mitigation of identified risks. For instance, MTN South Africa conducted human rights risk assessments on a quarterly basis, thereby meticulously applying the Group's human rights due diligence framework. These assessments identified various risks prevalent in the South African market. As the nature and potential impacts of these risks required further action, MTN South Africa notified MTN Group, leading to a collaborative effort that resulted in implementation of the following mitigation measures:



MTN's response

Identified risk

1. Because of their vulnerability, children face risks relating to violations of their privacy, discrimination, harassment and sexual abuse.
2. Excessive system access rights were provided to third-party call centre agents.
3. Government and law enforcement agencies may demand access to user data collected and stored by MTN through a court order, informal (immediate) request, or direct access to the network.
4. Data collected, held and processed by MTN and its employees can reveal personal information about individuals that, if accessed by government agencies or bad actors, can lead to security or financial vulnerabilities.

Mitigation

MTN South Africa blocks any access to prohibited sites. In addition, and in line with various pieces of legislation, MTN South Africa provides a report to the South African Police Service of all violations.

MTN contacted the third party to institute disciplinary action against agents involved and restrict system access.

MTN South Africa acts in line with our Digital Human Rights Policy and Data Privacy and Protection Policy, the Protection of Personal Information Act (POPIA) and all national legislations and legal frameworks pertaining to data privacy. MTN South Africa also remains compliant with national laws and is also cognisant that this represents direct access, with MTN having no influence over the accessibility of data by authorities. Lastly, MTN South Africa conducts routine checks and awareness sessions to ensure compliance.

MTN South Africa ensures that it acts in line with our Digital Human Rights Policy and Data Privacy and Protection Policy, POPIA and all national legislations and legal frameworks pertaining to data privacy. MTN South Africa also adheres to all other legislations related to data privacy and information security. Finally, MTN South Africa conducts routine checks and awareness sessions to ensure compliance.

Outlook

This human rights due diligence risk assessment has aided MTN South Africa's efforts in mitigating the impact on the human rights of South Africans within their market.



Digital human rights impact assessment and toolkit

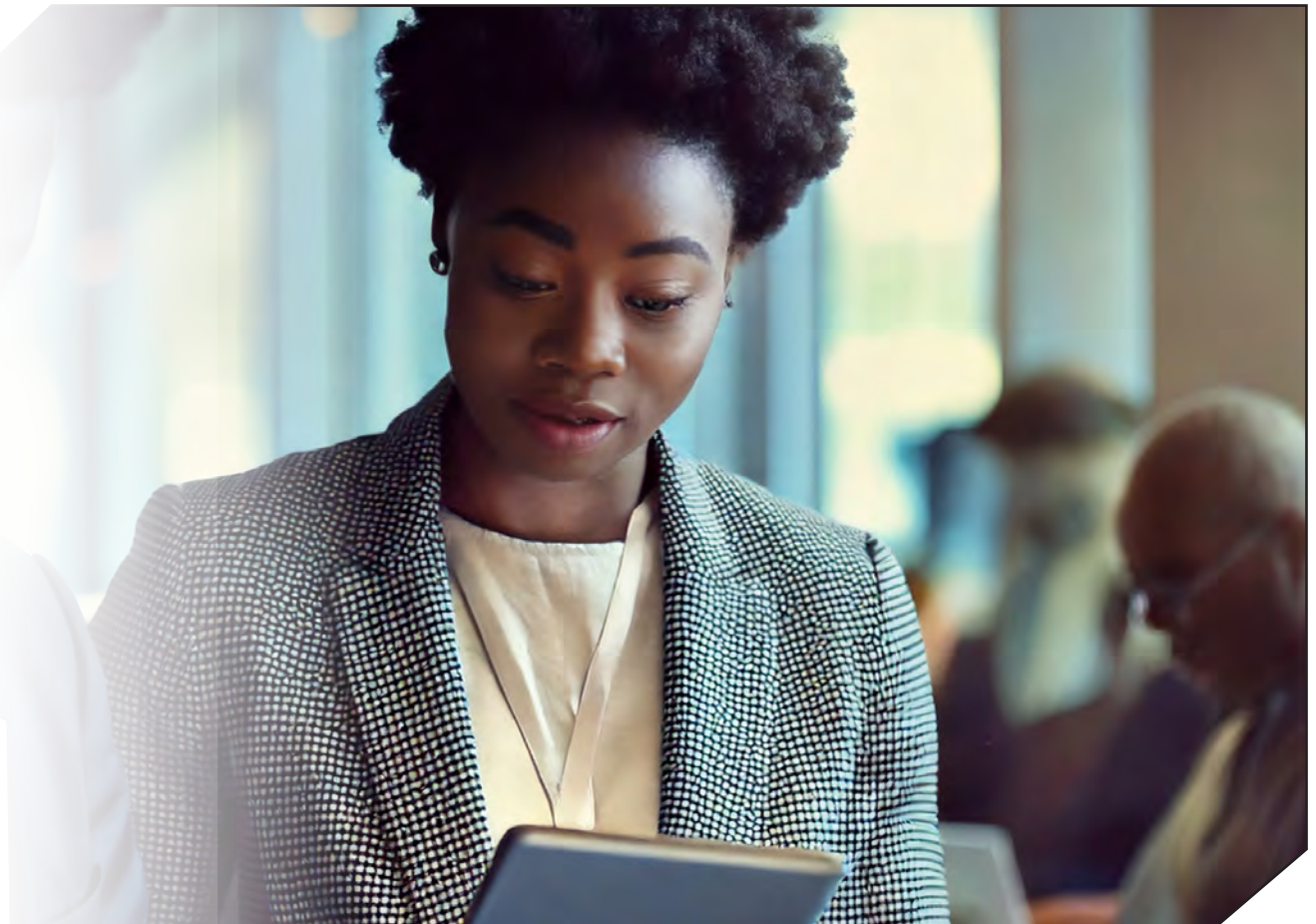
As a responsible business cognisant of our direct and indirect impact and influence on the human rights of our users, we follow a comprehensive impact management process to identify, prevent, mitigate and address any potential and actual risks and impacts on human rights. For our digital human rights impact assessments, we partner with experts in the field of human rights to determine how our activities, business relationships and services impact human rights. This approach allows us to identify salient human rights issues that have a significant bearing on our business activities. To enhance the digital human rights impact assessments, MTN conducts further risk assessments across all our operating markets to gain an understanding of risk factors unique to each jurisdiction in which we operate.

The foundation of MTN's approach to human rights and its promotion is based on our human rights framework, which has the following strategic objectives:

- Provide MTN with a common vision for how it will respect and promote human rights going forward, guided by our core beliefs.
- Enable MTN to continually improve its human rights approach, policies and systems.
- Allow for integration of MTN's digital human rights strategic responses.
- Enable MTN to operationalise human rights consistently across the business.
- Systematically entrench digital human rights into the organisation through a programmatic approach.

To achieve our strategic objectives, MTN offers comprehensive training programmes to raise awareness and understanding of human rights principles among our employees, business partners, suppliers and agents.

We conduct continuous assessments of our human rights impacts to stay informed about emerging developments and report on these in a transparent manner. Finally, we provide a secure and confidential whistle-blowing hotline that allows individuals to anonymously report any human rights complaints.



Heightened human rights approach during conflicts

CASE STUDY

Overview

Since 15 April 2023, Sudan has been engulfed in conflict, forcing millions from their homes and deepening an already dire humanitarian crisis. Essential services, including telecommunications, have been severely disrupted, cutting people off from critical information, aid, and loved ones. In this moment of urgent need, MTN remains unwavering in its commitment to keeping Sudanese communities connected.



MTN remains neutral in the conflict while continuing efforts to support peace and connectivity.

MTN's response

As a responsible business, MTN prioritises digital rights, resilience, and humanitarian considerations in our decisions. Our heightened digital human rights impact framework ensures that even in the most complex environments, we work to safeguard access to communication. Our approach includes:

- **Human rights risk assessments:** Identifying and addressing threats to connectivity, ensuring that the Sudanese people can stay informed and connected.
- **Risk mitigation strategies:** Implementing measures to reduce the impact of network disruptions while adhering to global best practices in digital rights. Where disruptions arise from factors beyond MTN's control – such as power outages, infrastructure damage, or legally mandated restrictions – we work to restore services as swiftly as possible.
- **Transparency and stakeholder engagement:** Engaging with regulators, civil society, and affected communities to navigate the crisis responsibly.
- **Restoration and continuity efforts:** Restoring services, wherever feasible, despite immense operational challenges.

Navigating service disruptions responsibly

The ongoing conflict has led to power outages and severe disruptions across Sudan, including a three-month network shutdown in early 2024. Where parts of the network have been restored, we continue working to expand access.

In 2024, MTN received requests to restrict or shut down services in certain instances. In each case, we have complied with these directives while undertaking all possible steps to minimise harm, fulfil our legal obligations and advocate for the least intrusive measures necessary to maintain public safety. Our decisions are guided by international human rights principles, and we remain firm in our commitment to digital access as a fundamental right.

Outlook

In times of crisis, telecommunications is more than just infrastructure, it is a lifeline for communities in distress, a tool for humanitarian response, and a means for people to stay informed and connected.

MTN stands with the people of Sudan. We will continue to assess risks, engage stakeholders, and explore innovative solutions to uphold digital human rights while ensuring operational resilience. As the situation evolves, we remain hopeful for a peaceful resolution. Until then, we will do everything in our power to keep Sudanese citizens connected because in times of crisis, every connection counts.



Digital human rights impact assessment and toolkit continued

Digital human rights impact assessment and toolkit

This toolkit is designed for continuous human rights due diligence across all markets. The toolkit includes specialised tools for product evaluation, operating market assessment, responsible entry and exit and mergers and acquisitions.

Digital human rights training

MTN concluded digital human rights training for all of our Opcos in August and September 2024. The purpose of the training was to capacitate Opco employees with a clear understanding of MTN's obligations under the United Nations Guiding Principles on Business and Human Rights. It focused on how to assess, mitigate and prevent digital human rights violations, particularly in cases where they may receive government-ordered requests to suspend services, throttle websites, or provide personal data about users. Opco employees were also trained on how to complete their digital human rights impact assessments.



Identifying the actions required for the business to migrate negative impacts

Scope

How many individuals could be impacted by the adverse effect?



Scale

How severe would the victim's adverse effects be?



Remediality

Will the remedy return the victim to the same or comparable position as before the harm?

Managing risks across our operational footprint

As a consequence of the size of our operations, it is important for MTN to communicate key developments and risk management related to human rights issues experienced across our operational footprint to our stakeholders. Through this communication, we promote transparency regarding our business challenges by sharing our stance on sensitive issues as well as challenges and other issues that we faced throughout the reporting period.

Digital human rights impact assessment and toolkit continued

Digital human rights impact assessments

In line with MTN's internal Digital Human Rights Policy and playbook, annual digital human rights impact assessments were conducted across our markets. As MTN operates in markets with unique and varying sociopolitical and economic circumstances, many of these markets have viewed the rise in social conflict and an increased cost of living as brewing issues. Consequently, they have identified government service order restrictions under the country's national security laws as a salient human rights issue. This would impact freedom of expression, access to information, education and economic rights.

In August 2024, the Group completed the sale of its Guinea-Bissau subsidiary to Telecel, marking its exit from the market. Given the potential human rights implications of the transition, MTN undertook an in-depth human rights impact assessment in July 2024, using the United Nations Guiding Principles on Business and Human Rights as a framework. The assessment aimed to identify and mitigate risks associated with Telecel's acquisition of MTN Guinea-Bissau, particularly concerning data protection, privacy rights and digital freedoms.

MTN's responsible exit strategy from Guinea-Bissau underscores our commitment to human rights and proactively addressing the potential risks and impacts associated with the transition. By prioritising transparency and stakeholder engagement, MTN ensures that its legacy in Guinea-Bissau contributes to sustainable and positive human rights impacts in the telecommunications sector.

Issue	Description	2024 achievements
Capacity building	Provide human rights training, guidance and resources, such as rehearsals, scenario planning and opportunities to participate in GNI events and dialogue.	Concluded training in August and September 2024.
Stakeholder engagement	Take a strategic approach to establishing stakeholder relationships that facilitate the early identification of human rights risks and a proactive approach to addressing these.	MTN became a member of the UNICEF South Africa Child Online Safety roundtable, which is a coalition of tech companies, telecommunication companies, civil society, the South African Police Service and academics exploring solutions on child online safety in South Africa.
Product and business model development	Work to continuously ensure product and business model development remove bias in data analytics, monetising data or facilitating hate speech and disinformation.	AI rollout: Assisted MTN Group Technology is involved in the development of the Responsible AI Policy as we explore using AI internally and in the delivery of efficient services. This helped to mitigate bias, ethical and human rights concerns. MTN Mobile Advertising and Sales: We are developing a Responsible Mobile Advertising and Sales Policy and rolling out of MTN ads to ensure that privacy rights, freedom of expression, and the rights of vulnerable groups are protected.
Business model due diligence	Anticipate, prevent and mitigate potential human rights risks posed by the Ambition 2025 strategy.	Completed exit risk assessments from our operations in Guinea-Bissau and Guinea Conakry.
Elections and heightened due diligence during social conflict	Anticipate, prevent and mitigate potential human rights risks posed by markets that are experiencing conflict and/or elections.	Concluded digital human rights impact assessments and election readiness plans for our markets that held elections in 2024 (i.e. South Africa, Ghana and Rwanda). We conducted a human rights risk assessment and adopted a heightened due diligence approach for Sudan, which is currently experiencing a humanitarian conflict.



Collaborating with partners and stakeholders

Human rights are every person's most critical and fundamental rights. It upholds a person's dignity and makes sure that they have the protection of basic human rights such as the right to freedom of expression, the right to life and the right to equality. To uphold the human rights of our employees, customers, stakeholders, users and all those affected by our business activities, the protection of human rights is woven into the fabric of our organisation. We have developed our strategy on human rights to emphasise our commitment to human rights, with a specific focus on freedom of expression and the right to privacy.

Our industry partners offer us with various opportunities to enhance our approach to digital human rights and improve our risk management practices. MTN collaborates with the GSMA on initiatives such as the GSMA Mobile Alliance to Combat Digital Child Sexual Exploitation, which is a working group of industry partners that shares learnings and advocacy approaches aimed at combating child sexual exploitation. MTN has also partnered with the IWF to host the only Africa-wide portal for the reporting of child sexual abuse material (CSAM). In addition, MTN is a member of the UNICEF South Africa Child Online Safety roundtable. This coalition includes tech companies, telecommunication companies, civil society organisations, the South African Police Service and academics exploring solutions for child online safety in South Africa. These solutions are geared towards proposed measures for implementation in telcos and tech companies, as well as partnerships and advocacy solutions, and regulatory reform.

In enhancing our approach to digital human rights, we are a member of the GNI, the leading multi-stakeholder forum for accountability, shared learning and collective advocacy on government and company policies and practices and the intersection of technology and human rights. GNI sets a global standard for responsible company decision making to promote and advance freedom of expression and privacy rights across the technology ecosystem. These opportunities allow MTN to engage in international exchanges, providing valuable insights to develop our digital human rights approach by considering peer influence and emerging policy trends. The Group's strategic memberships and active participation in industry initiatives emphasise MTN's commitment to ethical practices, human rights and global standards in telecommunications.

MTN is a member of the following bodies

- Signatory of the United Nations Global Compact.
- Data Protection and Privacy Working Group.
- GSMA Mobile Alliance Against Child Sexual Abuse Content (CSAM) and the GSMA Sustainability Network that addresses human rights.
- Center for Internet Security.
- Information Security Forum.
- Global Network Initiative (GNI).
- Joint Audit Co-operation (JAC).
- Global Enabling Sustainability Initiative (GeSI).

MTN is guided by the following international standards and guidelines

- The United Nations Universal Declaration on Human Rights.
- The United Nations "Protect, Respect and Remedy" Framework, implemented through the Guiding Principles on Business and Human Rights.
- African Union Convention on Cybersecurity and Personal Data Protection.
- ECOWAS Supplementary Act on Personal Data Protection (2010).
- SADC Model Law on Data Protection.
- The Organisation for Economic Co-operation and Development (OECD).
- The International Labour Organization (ILO).



Collaborating with partners and stakeholders continued

	Meeting group	Key outcomes	Frequency
Memberships	• GNI. • IWF. • UN Global Compact. • GSMA Mobile Alliance Against Child Sexual Abuse Content.	These memberships enable us to remain abreast with trends in the digital human rights space and contribute to policy development.	• Monthly. • Monthly. • Monthly. • Monthly.
Working groups	• Joint Audit Co-operation Human Rights Stream. • GNI Policy Committee. • GSMA Sustainability Network Meeting. • GSMA ESG Metrics for Mobile.	Participation in working groups enables us to engage with industry peers and contribute to policy development.	• Monthly. • Monthly. • Monthly. • Monthly.



Multi-stakeholder advocacy

CASE STUDY

Overview

We launched the Digital Human Rights Café to raise awareness about key human rights issues. The strategic business value of this initiative aimed to enhance our employees' awareness through a better understanding of digital human rights, strengthen our relationships with civil society organisations, and establish MTN's active and influential role in public policy debates on digital human rights in Cameroon.



Our Digital Human Rights Café was initiated to raise awareness about key human rights issues.

MTN's response

The initiative expanded to raise awareness among children at the Minpostel ICT Holiday Camps about the responsible use of the internet. This raised their understanding of the dangers associated with the internet, thereby contributing to child online protection. A key focus was to promote the online portal for reporting child abuse, providing children with a safe and reliable mechanism to seek help in cases of abuse.

In November 2024, the initiative was further expanded with an engagement session held for students at the Government Comprehensive High School. The session focused on educating teachers and students on topics such as cyberbullying, online harassment, responsible social media use and promoting inclusive online conduct.

Outlook

The Digital Human Rights Café equipped and informed our employees on human rights. It further underscores MTN Cameroon's commitment and willingness to engage with civil society, and to enhance digital safety and human rights. This sets a precedent for similar initiatives in the future.



Transparency and ranking digital rights

Global Network Initiative Assessment:

Since MTN joined the GNI¹ in 2022, our work has been continuously strengthened by the insights and recommendations gained from GNI's diverse voices, views and ample shared learnings, key to respecting and protecting our customers' freedom of expression and privacy rights.

GNI is a multi-stakeholder initiative comprising ICT companies, civil society organisations, academics and investors. For a company, joining the GNI means committing to the GNI Principles on Freedom of Expression and Privacy (Principles) and their accompanying Implementation Guidelines, which are based on international human rights law, and informed by the UN Guiding Principles on Business and Human Rights² (UN Guiding Principles). The measures taken by GNI companies to implement the principles must be assessed by independent³ accredited assessors – in MTN's case, Deloitte – and ultimately, the GNI's multi-stakeholder Accountability Committee and Board. They will determine whether the company has made a good faith effort to implement the GNI Principles and has shown improvement over time. This assessment work is one way for GNI members, such as MTN, to receive feedback on their work and exchange insights with a multi-stakeholder network of experts, sharing experiences, challenges and learnings.

Our societies are experiencing some real challenges. These examples show that the issues are often global rather than local. Both opportunities and risks are difficult to solve single-handedly. Within GNI we jointly address areas such as the relationship between laws and orders restricting communications and freedom of expression, government use of subscriber data, laws on data retention for surveillance, laws on state direct access to operator networks, restrictions on transparent reporting, and more.

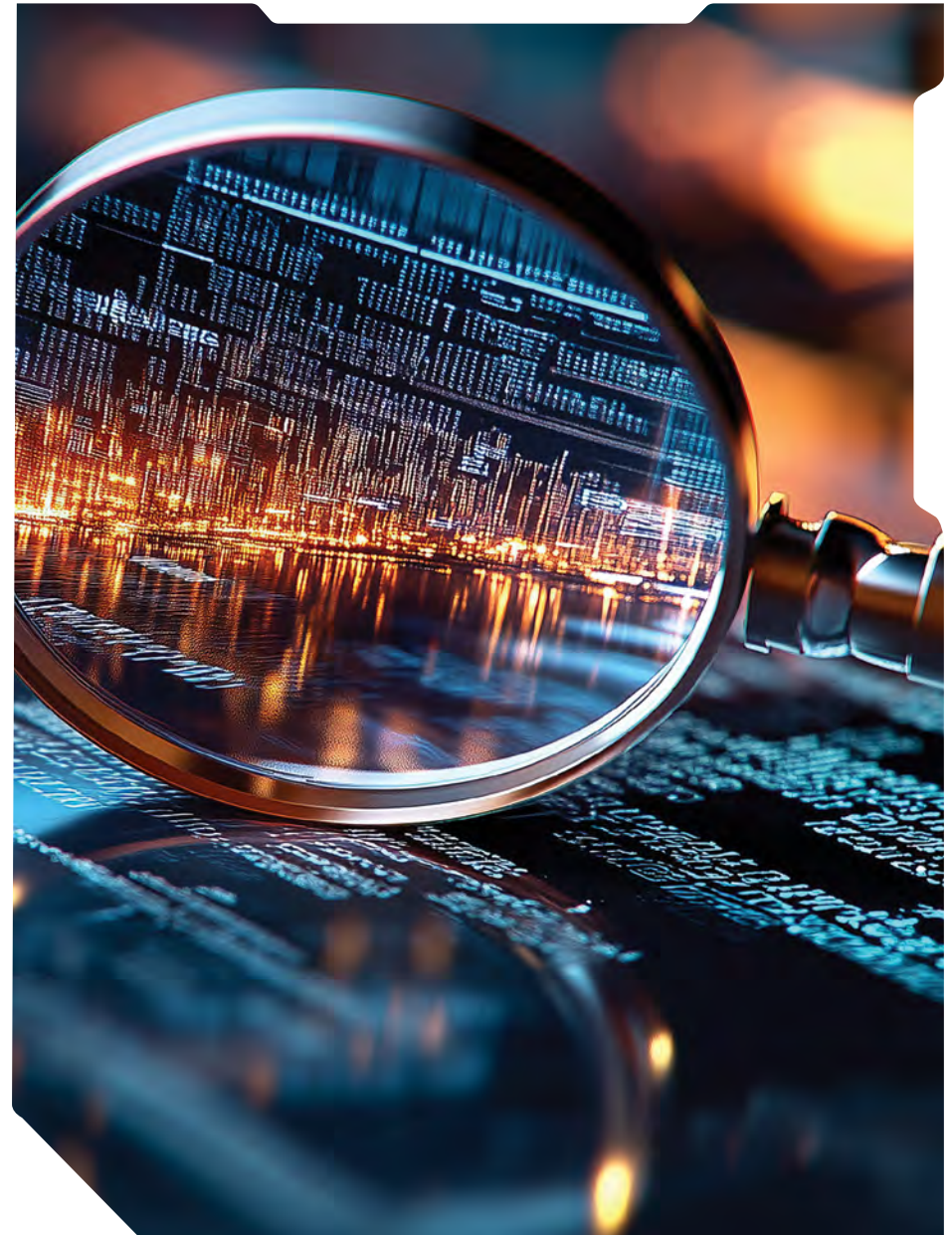
MTN undertook its first GNI assessment in 2024. Implementation of the GNI Principles is an evolving process designed to promote meaningful accountability while providing a framework to support collaborative learning and improvement. As such, the GNI assessment process recognises that companies have to grapple with new and evolving challenges related to freedom of expression and privacy. It seeks to identify good practices, points of learning and opportunities for improvement in the fast-changing world of digitalisation.

MTN sees great benefits in its GNI membership, including the assessment process, as part of an experience of both company-specific and shared learnings. We welcome additional companies to take a seat at the table and tackle complex issues, which no company can fully address by working on its own. Our work to respect and promote the rights of users continues and we look forward to the next round of GNI assessments.

¹ <https://globalnetworkinitiative.org/>

² https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

³ <https://globalnetworkinitiative.org/what-we-do/foster-accountability/independent-assessors/>



Transparency and ranking digital rights continued

Trends in transparency reporting

Transparency reporting is a cornerstone of MTN's commitment to accountability, ethical business practices and respect for human rights. We believe in providing our stakeholders with clear and comprehensive insight into our operations, policies and the impact of our activities on human rights. Our transparency reporting is a testament to our dedication to open communication and responsible corporate citizenship.

We enhance the transparency of our operations by sharing relevant information on various aspects, including data privacy, security measures and responses to government requests. As part of our commitment to staying at the forefront of industry best practices, we closely monitor trends in transparency reporting. We recognise the dynamic nature of the digital landscape, regulatory environment, and societal expectations. Consequently, our transparency reports evolve to address emerging issues, changing regulatory requirements and global trends in corporate accountability.

Recent trends in transparency reporting have highlighted the increasing importance of companies addressing issues such as data governance, digital rights and the impact of business activities on society. As we navigate the landscape of emerging technologies, MTN welcomes the potential of AI as an enabler of human rights and innovation. However, it acknowledges the potential harms to human rights from AI use, such as bias and the spread of misinformation and disinformation.

Progress in ranking digital rights

MTN participates in and supports initiatives that assess and rank digital rights practices. We recognise the significance of external evaluations to benchmark our performance, identify areas for improvement and showcase our dedication to human rights standards. Progress in ranking digital rights reflects our commitment to transparency and demonstrates our responsiveness to the evolving expectations of stakeholders. The Group gains valuable insight into global best practices and industry benchmarks by engaging with external assessments and rankings, such as those provided by organisations like Ranking Digital Rights (RDR). We use these assessments to refine our policies, strengthen our human rights commitments and foster continuous improvement in our operations.

In 2022, MTN participated in RDR's inaugural Telco Giants Scorecard, which ranked 12 of the world's leading telecommunications companies on their commitments to protect users' freedom of expression and privacy rights. MTN ranked sixth, outperforming all telecommunications companies outside the USA and Europe.

RDR has been unable to conduct scoring for 2024, citing internal capacity constraints. Nevertheless, MTN has made substantial internal improvements, and the positive impact of these changes is anticipated to be comprehensively reflected in the upcoming 2025 assessment.



Metrics and targets

In this section, we report on data from various operating markets that reflect the requests from authorities and non-governmental organisations for data. We also address several regulatory trends and provide an overview of the regulatory frameworks relevant to our operations.

Our markets report section provides

▶ **Regulatory trends**

We provide insight into developments in regulations across our markets.

▶ **Legislative requirements**

We provide an overview of the legislative requirements and authorities we report to in all of our markets.

▶ **Requests received from authorities**

We include data regarding the categories and number of requests that we have received from authorities.

▶ **Looking forward**

We reaffirm our commitment to upholding digital human rights and provide an overview of our focus in the coming year on the areas of technological advances and their impact on human rights, geopolitical shifts and their government-ordered service restrictions.



Markets report

MTN operates within diverse markets, each characterised by unique socioeconomic and political contexts, presenting a mix of challenges and opportunities. The Group recognises the nuanced differences in each country are essential for tailored and effective service provision. This section of the report provides a brief overview of the human rights landscape in all our operating markets, underscoring the understanding that operating uniformly may not be feasible.

Our portfolio at 31 December 2024

	MTN Group effective shareholding	Subscribers
 MTN South Africa	100.0%	39.8m
 MTN Nigeria ▲	76.3%	80.9m

SEA

 MTN Uganda ▲	76.0%	22.0m
 MTN Rwanda	80.0%	7.6m
 MTN Zambia	89.8%	6.4m
 MTN South Sudan	100.0%	3.3m
 Mascom Botswana ^Δ	53.1%	1.7m
 MTN Eswatini ^Δ	30%	1.0m

WECA*

 MTN Ghana ▲ [#]	73.9%	28.5m
 MTN Cameroon	80.0%	11.9m
 MTN Côte d'Ivoire	66.8%	16.3m
 MTN Benin	75.0%	7.2m
 MTN Congo-Brazzaville	100.0%	3.8m
 LonestarCell (MTN Liberia)	60.0%	2.2m

MENA*

 MTN Sudan	85.0%	2.5m
MTN IranCell ^{Δ*}	85.0%	55.6m

Associates, joint ventures (JVs) and other investments

aYo	50.0%
IHS Group	25.7%
Snapp Group	29.5%
Middle East Tech Ventures Holding ^Δ	50.0%

▲ Localisations.

■ Completed disposal in early 2024.

^Δ Equity accounted.

^Δ Not under MTN operational control.

[#] Legal ownership is 77.3%.

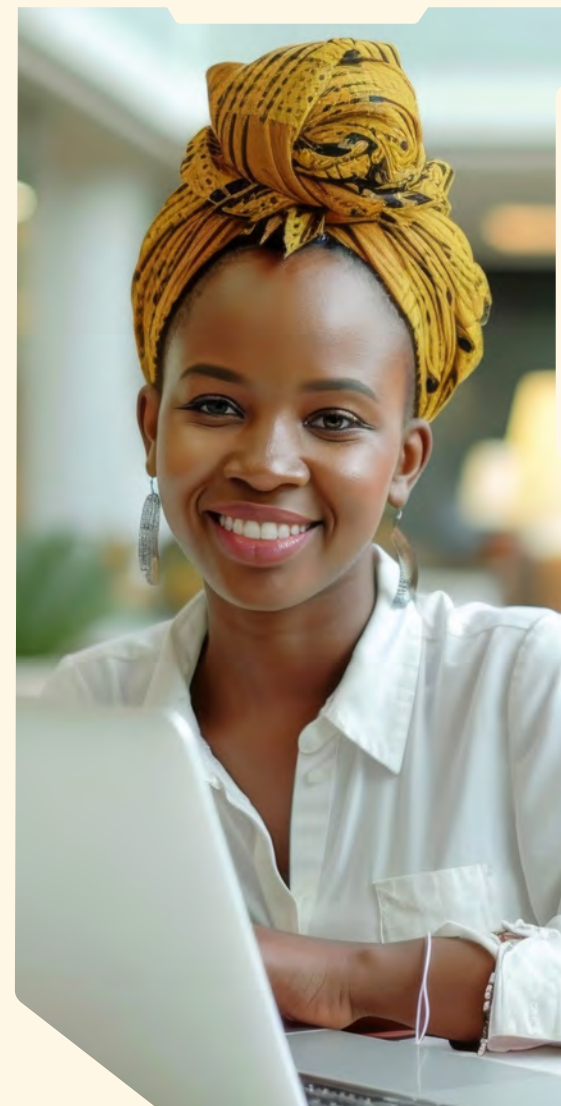
* In 2024, we exited Afghanistan, Guinea-Bissau and Guinea-Conakry, in line with our portfolio optimisation priority.

Markets report continued

Regulatory Trends across our markets

- **Development in digital human rights regulation:** In 2024, various jurisdictions across Africa made significant developments in digital human rights regulation. Countries such as Cameroon, Nigeria, Eswatini, Rwanda, Uganda and Zambia have enacted laws and regulations that strengthen their already established data protection and privacy laws. Notably, Cameroon's Law No. 2010/021 on Cybersecurity and Personal Data Protection, Nigeria Data Protection Act 2023, Eswatini's Data Protection Act of 2018, Rwanda's Law No. 58/2021 on Personal Data Protection, Uganda's Data Protection and Privacy Act (2019), and Zambia's Data Protection Act No. 3 of 2021 underscore these efforts to bolster data privacy and protection frameworks across Africa.
- **Cybersecurity and cybercrime regulations** have also been strengthened through legal updates that address digital fraud and cyber threats, as seen in the following:
 - > Benin's ratification of the African Union Convention on Cybersecurity and Personal Data Protection through Law 2024-05 and Decree 2024-772.
 - > Congo-Brazzaville's continued enforcement of its Cybersecurity Law (2020) and the Law on Fighting Cybercrime (2020).
 - > Comprehensive cybersecurity and cybercrime laws that regulate online offences and digital security practices, as seen in South Africa, Ghana, Eswatini, and Cameroon.
- **Digital and online content:** We have also noted the trend in growing regulation of digital and online content through consumer protection laws, anti-misinformation regulations, and child safety initiatives as seen in South Africa's Direct Marketing Guidance Note in terms of the Protection of Personal Information, 2024; Rwanda's child online protection instructions (MINICT/2024); Zambia's Children's Code Act of 2022; and the continued enforcement through Uganda's Communications Act, Cap. 103, Data Protection and Privacy Act, Cap. 97, Computer Misuse Act, Cap. 96, Communications (Consumer Protection) Regulations, 2019, and Communications (Content) Regulations, 2019.

- **Surveillance:** There is an increasing trend of governments continuing to enforce or broaden their surveillance powers in the name of national security. South Africa's Regulation of Interception of Communications Act (RICA), Uganda's Regulation of Interception of Communications Act, and Zambia's ICT Telecommunication Traffic Monitoring Regulations grant authorities the power to intercept digital communications. Additionally, financial security and digital transactions are also being strengthened through stringent anti-money laundering (AML) laws and financial consumer protection regulations. South Sudan's Electronic Money Regulation of 2017, Rwanda's Financial Service Consumer Protection Law (No. 017/2021), and Uganda's National Payment Systems Act underscore efforts to regulate fintech, mobile money, and financial transactions.
- **Access to information:** As a trend, many jurisdictions are reinforcing citizens' rights to access information, particularly in digital spaces. South Sudan's Right of Access to Information Act, 2013, Rwanda's Law Relating to Access to Information, 2013 and Zambia's Access to Information Act, 2023 have all enacted laws that promote transparency and government accountability. Furthermore, several countries have made significant strides to harmonise their regional laws with international legal standards. For example, Benin, Côte d'Ivoire, and Liberia have adopted Economic Community of West African States (ECOWAS) regulations on digital governance, while Congo-Brazzaville has ratified the African Union Convention on Cybersecurity and Personal Data Protection. Additionally, Côte d'Ivoire has incorporated the Union Économique et Monétaire Ouest Africaine (UEMOA) directive on Telecommunications Regulation into its national legal framework.



Markets report continued

Categories of requests from authorities

Operating markets have supplied data pertaining to requests received from both authorities and non-governmental entities. Given the diverse array of laws and regulations applicable to our markets, we have classified the requests from authorities into the relevant categories.

Data request type (authorities)	Data request description
 Requests pursuant to criminal investigations	Requests by authorities submitted pursuant to the terms of applicable laws or by virtue of a court order for information of subscribers in the context of criminal investigations, such as subscriber identification, call and SMS information, billing statement and historical location data. These requests do not include requests by authorities for the content of the underlying communications or requests related to MTN.
 Requests for location disclosures	Requests made by authorities that are permitted under applicable laws or by court order for the current location of a subscriber.
 Requests for lawful interceptions	Requests made by authorities that are permitted under applicable laws or by court order for the lawful interception of a subscriber's communication.
 Requests pursuant to governmental or regulatory oversight	Requests made by authorities for information required to perform their designated governmental or regulatory functions, including their oversight of telecommunication service providers.
 Requests pursuant to suspension of Mobile Station International Subscriber Directory Numbers (MSISDNs), and Subscriber Identification Module (SIM) cards	Requests made by authorities that are legally permitted under applicable laws or by court order obliging mobile network operators to suspend or deactivate SIM cards or MSISDNs numbers of subscribers.
 Service restriction orders and internet shutdowns	Requests by authorities that are legally permitted under applicable laws or by court order obliging mobile network operators to block or restrict a service or to shut down the internet or social media services.
Data request type (non-governmental entities)	Data request description
 Requests pursuant to civil litigation	These requests generally consist of requests made by non-governmental entities engaged in civil litigation with or on behalf of subscribers and subscriber requests for their own data.
 Requests for personal and private use	Subscribers may request access to their own data for several reasons, including to comply with a requirement from an embassy or a visa requirement.

To some extent, there may be an overlap between the above mentioned categories of requests, as certain requests received by an operating market may be broader than others.



Markets report continued

Overview of total requests received

The digital human rights landscape in our markets remained dynamic in 2024, as reflected by the quantitative data. These shifts indicate the impact of technology, regulatory amendments and growing concerns in the digital human rights space.

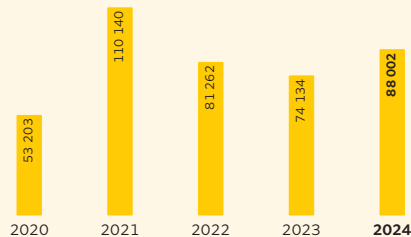
It is not possible to definitively determine the exact reasons behind individual requests at this time, and therefore an analysis of the increase or decrease in the data would be speculative. However, we have observed certain trends across the markets that may provide insight into the potential factors influencing these changes. Please note that this is not a conclusive assessment but rather an informed observation based on current patterns. In our estimation, these shifts may have occurred due to: (i) shifts in law enforcement strategies;

(ii) increased social conflict and protests in various regions; (iii) geopolitical shifts; and (iv) legislative changes (including those pertaining to national identity systems and SIM card registration processes).

- Criminal investigation requests:
Increased from 74 134 in 2023 to 125 971 in 2024.
- Government and regulatory oversight requests:
Increased from 295 in 2023 to 743 in 2024.
- Lawful interception requests:
Decreased from 1 476 in 2023 to 242 in 2024.
- Location disclosure requests:
Decreased from 90 816 in 2023 to 40 371 in 2024.
- MSISDNs and subscriber identification requests:
Decreased from 130 480 in 2023 to 61 145 in 2024.

- Services restriction orders and internet shutdown requests:
Decreased from 196 in 2023 to 97 being reported in 2024. This significant reduction could be attributed to the challenges in accessing and retrieving information in our markets that are undergoing conflict.
- Requests for personal and private use:
Increased from 1 231 in 2023 to 25 269 in 2024. This increase may be attributed to the rise of laws that have strengthened data protection and access within our markets.
- Civil litigation requests:
Increased from 341 in 2023 to 1 152 in 2024.

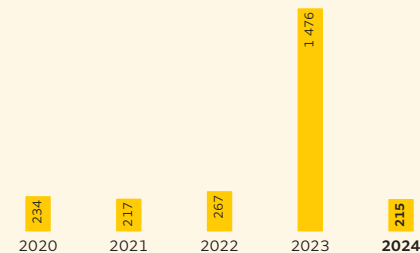
Criminal investigation requests



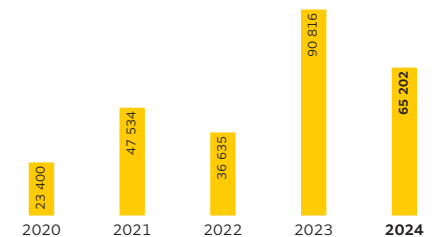
Governmental and regulatory oversight requests



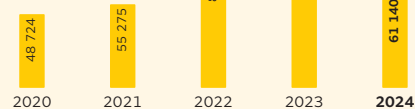
Lawful interception requests



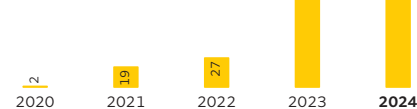
Location disclosure requests



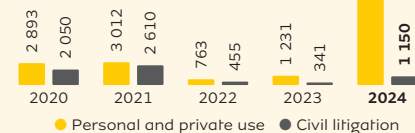
MSISDNs and subscriber identification requests



Services restriction orders and internet shutdown requests



Requests for personal and private use, and civil litigation



Markets report continued

Benin



MTN has been present in Benin since 2006 and has approximately 7.2 million subscribers. In 2024, MTN's revenue in Benin was R7.3 billion.

Regulatory framework

- Decision No. 2022-0248 establishing the boundaries, security measures and the camouflage rules of radio sites in the Republic of Benin.
- Decision No. 2022-082 establishing the conditions for the termination of SIM cards by operators of electronic communications networks and services in the Republic of Benin.
- Decision No. 2022-049 outlining the framework for the rates of electronic communications services provided by mobile operators in the Republic of Benin.
- Decision No. 2022-025 for guidelines for national roaming on mobile electronic communications networks in the Republic of Benin.
- Decision No. 2021 – 197 on rules for managing the top-level internet domain name ".bj" in the Republic of Benin.
- Decision No. 2021 – 237 approving the standard specifications for the establishment and operation of an internet access supply network in the Republic of Benin.
- Decision No. 2021 – 075 approving the standard specifications for the establishment and operation of virtual mobile networks (MVNO and MVNE) in the Republic of Benin.
- Bilateral Memorandum of Understanding signed on 18 October 2023 between ARCEP Benin and ARCEP Togo to implement the ECOWAS regulation on community roaming and communications facilities.
- Bilateral Memorandum of Understanding concluded on 9 December 2023 between ARCEP Benin and AMRTP Mali to implement the ECOWAS regulation on community roaming and communications facilities.
- Decision No. 2023-113/ARCEP/PT/SE/GU of May 2023 for guidelines on national roaming on mobile electronic communications networks in the Republic of Benin.
- Article 23 of the Constitution of Benin (Law 2019-40 of 7 November 2019 amending the Constitution of 11 December 1990).
- Decree No. 2023-060 of 22 February 2023 approving the Protection Policy Rules of the Critical Information Infrastructures in the Republic of Benin.
- Bilateral Memorandum of Understanding signed on 27 March 2024 between ARCEP Benin and National Communication Authority of Ghana to implement the ECOWAS regulation on community roaming and communications facilities.
- ARCEP Decision No. 2024-150/ARCEP/PT/SE/DJPC/GU on the organisation of the process for identifying users of electronic communication services in the Republic of Benin.
- Law No. 2024-22 of 26 July 2024 on the Beninese Commission for Human Rights.
- Law No. 2024-12 of 29 March 2024 authorising the ratification of the African Union Constitution and the Convention on Telecommunications adopted in Cape Town (South Africa) on 7 December 1999 and in Harare (Zimbabwe) on 10 July 2014.
- Decree 2024-861 of 29 March 2024 ratifying the African Union Constitution and the Convention on Telecommunications adopted in Cape Town (South Africa) on 7 December 1999 and in Harare (Zimbabwe) on 10 July 2014.
- Law 2024-05 of 1 February 2024 authorising the ratification of the African Union Convention on Cybersecurity and Personal Data Protection adopted in Malabo (Equatorial Guinea) on 27 June 2024.
- Decree 2024-772 of 1 February 2024 ratifying the African Union Convention on Cybersecurity and Personal Data Protection adopted in Malabo (Equatorial Guinea) on 27 June 2014.
- Law 2024-06 of 1 February 2024 authorising accession to the Convention on Cybercrime adopted in Budapest (Hungary) on 23 November 2001, to the Additional Protocol to the Convention on Cybercrime concerning the criminalisation of acts of a racist and xenophobic nature committed through computer systems adopted in Strasbourg (France) on 28 January 2003, and the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence adopted in Strasbourg (France) on 12 May 2022.
- Decree 2024-773 of 1 February 2024 authorising accession to the Convention on Cybercrime adopted in Budapest (Hungary) on 23 November 2001, to the Additional Protocol to the Convention on Cybercrime concerning the criminalisation of acts of a racist and xenophobic nature committed through computer systems adopted in Strasbourg (France) on 28 January 2003, and the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence adopted in Strasbourg (France) on 12 May 2022.

Markets report continued

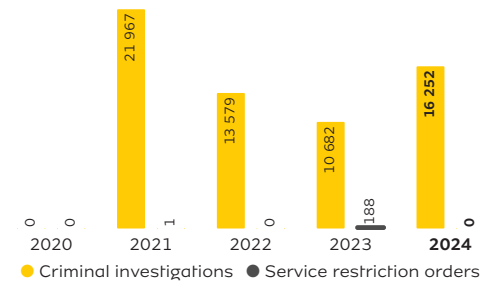
Benin



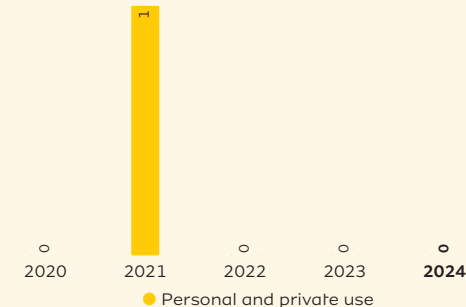
Authorities

- Information Systems and Digital Agency (ASIN).
- Personal Data Protection Authority.
- National Financial Information Processing Unit.
- Republican Police: General Directorate of the Republican Police.
- National Personal Identification Agency.
- Ministry of Justice.
- Ministry of Economy and Finance.
- Ministry of Interior and Public Security.
- Ministry of National Defence.
- The Constitutional Court.
- Courts and Tribunals in Benin.
- Ministry of Digital and Digitalisation.
- Economic Crimes and Terrorism Court.
- Authority of Post and Electronic Communications (ARCEP Benin).
- Regulatory Authority.
- Central Office for the Repression of Cybercrime.
- National Centre for Digital Investigation.
- Ministry of Foreign Affairs.

Requests from authorities



Requests from non-governmental entities



Markets report continued

Cameroon



MTN has been present in Cameroon since 2000 and has approximately 28.5 million subscribers. In 2024, MTN's revenue in Cameroon was R2.7 billion.

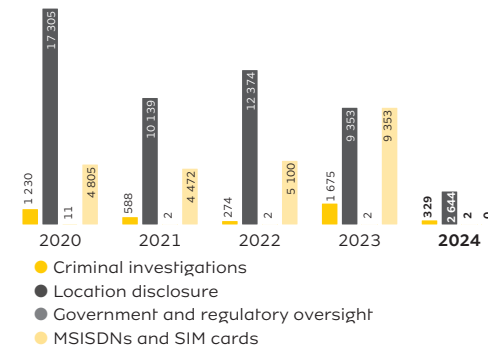
Regulatory framework

- The Preamble of Cameroon's Constitution.
- Law No. 2010/013 of 21 December 2010 regulating electronic communications in Cameroon as modified and completed by Law No. 2015/006 of 20 April 2015.
- Law No. 2010/012 of 21 December 2010 relating to cybersecurity and cybercriminality.
- Law No. 2010/021 of 21 December 2010 relating to electronic commerce in Cameroon.
- Decree No. 2013/0399/PM of 27 February 2013 establishing the modalities for the protection of consumers of electronic communications services.
- Decree No. 2015/3759 of 3 September 2015 laying down conditions for the identification of subscribers and terminal equipment of electronic communications networks.
- Law No. 2016/007 on 12 July 2016 relating to the Penal Code in Cameroon.
- Decree No. 2017/2580/PM of 6 April 2017 establishes the conditions for the establishment and exploitation of electronic communications networks that are subject to the authorisation regime in Cameroon.
- Law No. 2015/007 of 20 April 2015 governing audio-visual activities in Cameroon.
- Law No. 2023/009 of 25 July 2023 to institute the charter on child online protection in Cameroon.
- Law No. 2024/017 of 23 December 2024 relating to personal data protection in Cameroon.

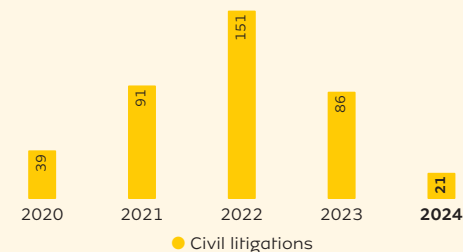
Authorities

- Ministry of Posts and Telecommunications.
- Telecommunications Regulatory Board.
- National Agency for Information and Communication Technologies.
- The Personal Data Protection Authority.

Requests from authorities



Requests from non-governmental entities



Markets report continued

Congo-Brazzaville



MTN has been present in Congo-Brazzaville since 2005 and has approximately 3.7 million subscribers. In 2024, MTN's revenue in Congo-Brazzaville was R4.7 billion.

Regulatory framework

- Law No. 8-2001 of 12 November 2001 on freedom of information and communication.
- Law No. 9-2009 of 25 November 2009 on the regulation of electronic communications.
- Law No. 11-2019 of 25 November 2009 on the creation of the regulatory agency for posts and electronic communications.
- Law No. 29-2019 of 10 October 2019 on the protection of personal data.
- Law No. 30-2019 of October 2019 on the creation of the national agency of information system security.
- Law No. 26-2020 of 5 June 2020 on cybersecurity.
- Law No. 27-2020 of 5 June 2020 on fighting cybercrime.
- Law 43-2020 of 20 August 2020 authorising the ratification of the convention of the African Union on cybersecurity and the protection of personal data.
- Article 18-20 of Law No. 073/84 of 17 October 1984 on Family Code.
- Article 26 of the Constitution of the Republic of the Congo of 6 November 2015.
- Law No. 36-2024 dated 11 October 2024 on consumer protection.

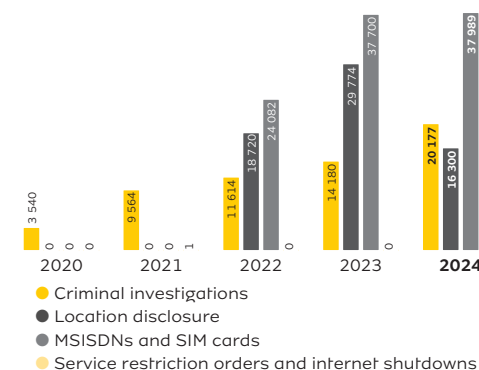
The Republic of Congo is one of six member countries of the Central African Economic and Monetary Community (CEMAC). As such, at a regional level, digital human rights are regulated by the CEMAC through:

- Directive No. 06/08-UEAC-133-CM-18 defining the regime of universal service in the electronic communications sector among CEMAC state members.
- Directive No. 07/08-UEAC-133-CM-18 defining the legal framework for the protection of users of electronic communications services and networks in the CEMAC.
- Directive No. 08/08-UEAC-133-CM-18 on interconnection and access to network and electronic communications services in CEMAC state members.
- Directive No. 09/08-UEAC-133-CM-18 harmonising the legal framework of electronic communication activities in CEMAC state members.
- Directive No. 10/08-UEAC-133-CM-18 harmonising the rules of establishing and controlling tariffs for electronic communication services in the CEMAC.
- Directive No. 21/08-UEAC-133-CM-18 harmonising the rules and regulations of electronic communication in the CEMAC.
- Law no. 38-2024 of 11 October 2024 on the creation of a register for the identification of beneficiaries of legal persons.
- Law no. 36-2024 of 11 October 2024 on consumer protection.

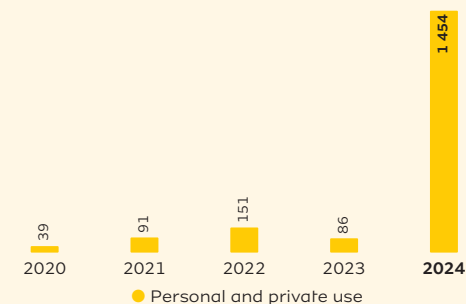
Authorities

- ARPCE is the Congolese Authority for the control, monitoring and regulation of the post and electronic communications sectors.
- The national agency of information system security (ANSSI).
- The Directorate General of Post and Telecommunications (DGPT).
- The Digital Economy Development Agency.
- The National Commission for Personal Data Protection.
- The National Competition Authority.

Requests from authorities



Requests from non-governmental entities



Markets report continued

Côte d'Ivoire



MTN has been present in Côte d'Ivoire since 2005 and has approximately 16.3 million subscribers. In 2024, MTN's revenue in Côte d'Ivoire was an estimated R9.4 billion.

Regulatory framework (at national level)

- Law No. 2016-886 of 8 November 2016, establishing the constitution of the Republic of Côte d'Ivoire, as amended by constitutional law no. 2020-348 of 19 March 2020.
- Law of 2024-352 of 6 June 2024 relating to electronic communications (repeals Order no. 2012-293 of 21 March 2012 on Telecommunications and Information and Communication Technologies except for articles 51, 71 and 157, respectively, creating the Agence ivoirienne de Gestion des Fréquences, the Autorité de Régulation des Télécommunications/TIC de Côte d'Ivoire and the Agence nationale du Service universel des Télécommunications/TIC).
- Law No. 2013-450 of 19 June 2013 on the protection of personal data.
- Law No. 2013-451 of 19 June 2013 on the fight against cybercrime.
- Law No. 2013-546 of 30 July 2013 on electronic transactions.
- Law No. 2017-802 of 7 December 2017 on the orientation of the information society in Côte d'Ivoire (sets the general, legal and institutional principles of the information society in Côte d'Ivoire).
- Ordinance No. 2024-368 of 12 June 2024 on the Organisation of Civil Society.
- The Penal code.
- Decree No. 2012-934 of 19 September 2012 on the organisation and operation of the Autorité de Régulation des Télécommunications/ICT de Côte d'Ivoire (ARTCI).
- Decree No. 2013-301 of 2 May 2013 on the approval of terminal and radio equipment and the approval of installers.
- Decree No. 2013-439 of 13 June 2013 setting the conditions and procedures for reserving, allocating and withdrawing numbering resources, as well as the amounts and procedures for payment of fees for the use of numbering resources.
- Decree No. 2015-812 of 18 December 2015 approving the specifications attached to each individual licence in category C 1 A, for the establishment of networks and the provision of telecommunications/ICT services.
- Decree No. 2017-193 of 22 March 2017 on the identification of subscribers to telecommunications/ICT services open to the public and users of cyber cafés.
- Decree No. 2018-875 of 22 November 2018 establishing the powers, composition, organisation and functioning of the National Commission for the Development of the Information Society (CNDSI).
- Article 19 of the Constitution of the Republic of Côte d'Ivoire dated 8 November 2016.
- Article 15 of Law No. 2015-493 dated 7 July 2015 combating terrorism.
- Decree 2021-245 of 26 May 2021 fixing the fees for the use of radio frequencies.

- Decree No. 2021-917 of 22 December 2021 defining the audit, control and certification procedures for information systems.
- Decree No. 2021-916 of 22 December 2021 adopting the general information systems security framework and the critical infrastructure protection plan.
- Decree No. 2021-915 of 22 December 2021 adopting the information systems security policy of the public administration.

Regulatory framework (at community level)

- Directive No. 02/2006/CM/UEMOA on the harmonisation of legal regimes applicable to telecommunication network operators and service providers. It is specified that the transposition of this Directive into national law does not affect the specific regulations adopted by the member states in particular on the basis of compliance with essential requirements and other requirements in the public interest.
- Additional Act A/SA. 3/01/07 ECOWAS of 19 January 2007 on the legal regime applicable to operators and service providers aims to harmonise the ECOWAS legal regimes applicable to the activity of telecommunications network operators and service providers and to specify the procedures for granting licences, authorisations and declarations and the conditions applicable to these different regimes. Its transposition into domestic law does not affect the specific regulations adopted at national level.

Markets report continued

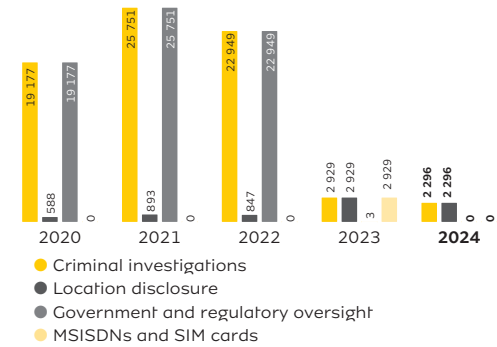
Côte d'Ivoire



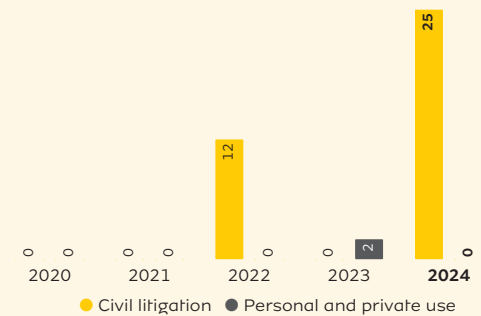
Authorities

- Autorité de Régulation des Télécommunications/TIC de Côte d'Ivoire (ARTCI).
- Agence Ivoirienne de Gestion des Fréquences Radioélectriques.
- Agence Nationale du Service Universel des Télécommunications
- Platform for Combating Cybercrime.
- Ministry of the Interior.
- Ministry of Digital Transition and Digitalisation.
- Ministry of Justice and Human Rights.
- Ministry of Security.
- Ministry of Defence.
- Human Rights Commission.
- Police Administrations.

Requests from authorities



Requests from non-governmental entities



Markets report continued



Eswatini



MTN has been present in Eswatini since 1998. The joint venture has approximately 1.03 million subscribers. In 2024, MTN's revenue in Eswatini was R108 million.

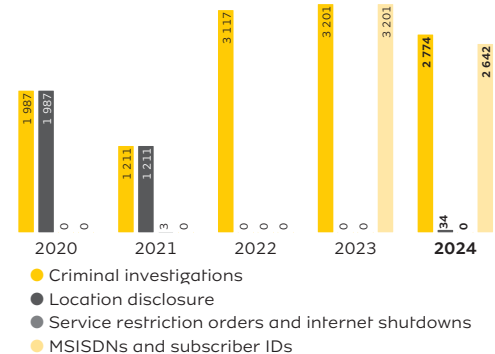
Regulatory framework

- Swaziland Communications Commission Act No. 10/2013.
- The Electronic Communications Act No. 09/2013.
- The Swaziland Communications Commission (Consumer Protection) Regulations, 2016.
- The Swaziland Communications Commission (Subscriber Registration) Regulations, 2016.
- Broadcasting Guidelines 2017.
- Constitution of the Kingdom of Eswatini Act No. 001/2005: Section 18 – Protection from Inhuman or Degrading Treatment. When interpreted by the courts, this includes the right to privacy.
- Sections 24(1) and 24(2) of the Constitution of the Kingdom of Eswatini Act No. 001/2005.
- Data Protection Act 2022.
- Computer Crime and Cybercrime Act 2022.
- Electronic Communications Transactions Act 25 of 2002.
- License Standard Terms and Conditions.
- Sections 212 and 331 of the Companies Bill 2024.

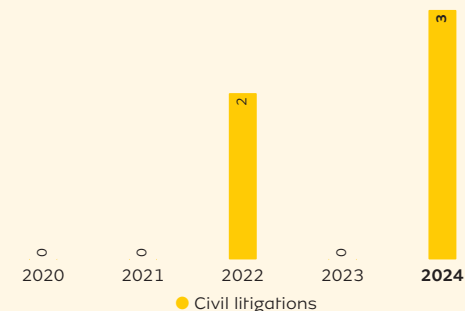
Authorities

- Courts.
- Statutory bodies.
- Government agencies.
- Ministry of Information, Communications and Technology.
- Eswatini Communications Commission.
- Anti-Corruption Commission.
- Eswatini Revenue Authority.
- Royal Eswatini Police Service.

Requests from authorities



Requests from non-governmental entities



Markets report continued



Ghana



MTN has been present in Ghana since 2006 and has approximately 28.5 million subscribers. In 2024, MTN's revenue in Ghana was R22.6 billion.

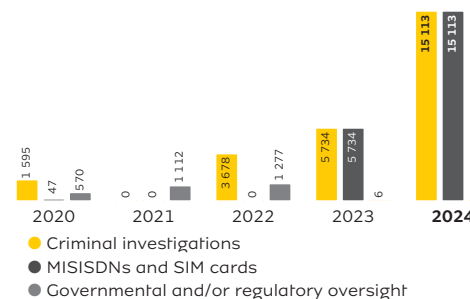
Regulatory framework

- The 1992 Constitution.
- The Cybersecurity Act, 2020 (Act 1038).
- The Electronic Communications Act, 2008 (Act 775) as amended.
- The Electronic Transactions Act, 2008 (Act 772) as amended.
- The Data Protection Act, 2012 (Act 843).
- Electronic Communications Regulations, 2011 (L.I. 1991).
- Directive for the Protection of Critical Information Infrastructure (CII).
- Revenue Administration Act, 2016 (Act 915) as amended.
- Electronic Transfer Levy (E-Levy) Act, 2022 (Act 1075) as amended.
- Electronic Transfer Levy (E-Levy) (Amendment) Act, 2022 (Act 1089).
- Right to Information Act, 2019 (Act 989).
- Anti-Terrorism Act, 2008 (Act 762) as amended.
- Subscriber Identity Module (SIM) Registration Regulations, 2011 (LI 2006).
- Criminal Offences Act, 1960 (Act 29) as amended.
- Establishment of Emergency Communications System Instrument, 2020 (E.I 63).
- Communication Service Tax Act, 2008 (Act 754) as amended.
- Payment Systems and Services Act, 2019 (Act 987).
- Office of the Special Prosecutor Act, 2017 (Act 959).
- Office of the Special Prosecutor (Operations) Regulations, 2018 (L.I. 2374).
- The Mobile Number Portability Regulations, 2011 (LI 1994).

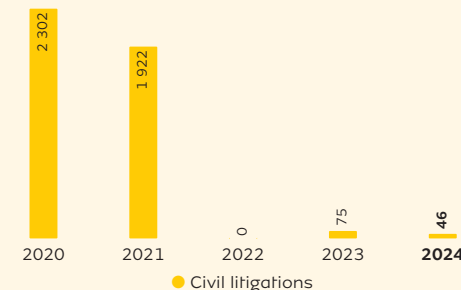
Authorities

- Courts.
- Cybersecurity Authority (CSA).
- National Communications Authority (NCA).
- National Information Technology Authority (NITA).
- Data Protection Commission (DPC).
- Ghana Revenue Authority (GRA).
- Bank of Ghana (BoG).
- Office of the Special Prosecutor.
- Security and intelligence agencies: Ghana Police Service, National Intelligence Bureau, National Signals Bureau.

Requests from authorities



Requests from non-governmental entities



Markets report continued



Liberia



MTN has been present in Liberia since 2005 and has approximately 2.1 million subscribers. In 2024, MTN's revenue in Liberia was R4.8 billion.

Regulatory framework

- Article 15 of the Liberian Constitution (1986).
- Telecommunications Act of 2007.
- Supplementary Act A/As. 1/01/10 on Personal Data Protection within ECOWAS.
- Amended Subscribers Identification Module (SIM) Cards/ Removable User Identity Module (RUI) Registration Regulations.
- Regulations for the Treatment of Confidentiality, Dispute Resolution, Compliance and Enforcement 2009 LTA-REG-0002.
- Regulation C/Reg. 21/12/17 for Roaming on Public Mobile Communications Network in the ECOWAS Region.
- Interconnection Regulations, 2009 LTA-REG-0003.
- LTA Order: 0018-01-15-20 On the Implementation of Free Roaming on Public Mobile Communications Networks in the ECOWAS Region.
- LTA Order: 0018-03-12-20 Implementing the SIM Card Registration Regulations.
- Regulations on International Traffic LTA – REG – 0005.
- Regulation No. LTA-REG-LTA-011 – Regulation on Consumers Protection Regulation.
- Regulation No. LTA-REG-0011- Regulation on wholesale access and value-added services.
- Reg-LTA-REG-0010-Regulation on national numbering resources.

Authorities

- Liberia Telecommunications Authority.
- Ministry of Justice.
- Courts of Liberia.

Requests from authorities



Markets report continued

Nigeria



MTN has been present in Nigeria since 2001 and has approximately 81 million subscribers. In 2024, MTN's revenue in Nigeria was an estimated R35 billion.

Regulatory framework

- Section 37 of the Constitution of the Federal Republic of Nigeria, 1999.
- Section 39 of the Constitution of the Federal Republic of Nigeria, 1999.
- Nigeria Data Protection Act (NDPA), 2023.
- Nigeria Data Protection Regulation (NDPR), 2019.
- NDPR Implementation Framework, 2020.
- Criminal Code Act.
- Defamation Law of the various states.
- Penal Code and penal laws of the various states.
- National Identity Management Commission Act, 2008.
- Child's Rights Act, 2003.
- Child's Rights Law of Lagos State, 2007.
- Federal Competition and Consumer Protection Act, 2018
- Lagos State Consumer Protection Agency Law, 2024.
- Freedom of Information Act, 2011.
- Cybercrime (Prohibition, Prevention, etc.) Act, 2015.
- Cybercrime (Prohibition, Prevention, Etc.) (Amendment) Act, 2024.
- Advertisement Regulatory Council of Nigeria Act, 2022.
- Terrorism (Prevention and Prohibition) Act, 2022.
- Copyrights Act, 2022.
- Violence Against Persons Act, 2015 and Violence Against Persons Laws of various states in Nigeria.
- Lagos State Protection Against Domestic Violence Law, 2009.
- Nigerian Communications Commission (Registration of Communication Subscribers) Regulations, 2022.
- Nigerian Communications Commission Internet Code of Practice, 2019.
- Nigerian Communications Commission Consumer Code of Practice Regulations, 2024.
- NITDA: Guidelines for the Management of Personal Data by Public Institutions in Nigeria, 2020.
- Nigerian Communications Commission: Guidelines on Short Code Operations in Nigeria, 2023.
- Restrictive Agreements and Trade Practices Regulation, 2022.
- The Abuse of Dominance Regulations, 2022.
- Nigerian Code of Advertising, 2023.
- Lagos State Safeguarding and Child Protection Policy 2016.

Licence terms

- Unified Access Service Line.

Regulations, policies and guidelines

- NITDA: Code of Practice for Interactive Computer Service Platforms/ Internet Intermediaries.
- Central Bank of Nigeria: Consumer Protection Regulations 2019.
- Nigerian Communications Commission: Child Online Protection Policy.
- Nigerian Communications Commission: Lawful Interception of Communications Regulations, 2019.
- Nigerian Communication Commission: Licence Framework for Value Added Services.
- Nigerian Communications Commission: Value Added Services and Aggregator Framework, 2018 (amended).

Markets report continued

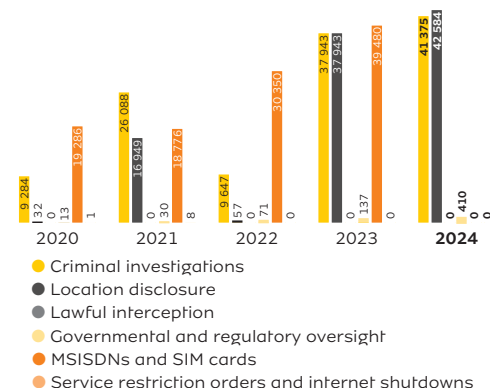
Nigeria



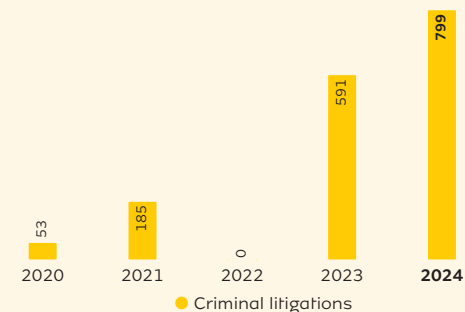
Authorities

- National Information Technology Development Agency.
- Nigeria Data Protection Commission.
- Office of the National Security Adviser.
- Nigerian Communications Commission.
- Courts.
- Relevant authorities defined under section 20 of the Nigerian Communications (Enforcement Process, etc.) Regulations, 2019.
- National Identity Management Commission.
- ECOWAS Court and Institutions.
- Central Bank of Nigeria.
- Federal Competition and Consumer Protection Commission.
- Lagos State Consumer Protection Agency.
- Advertising Regulatory Council of Nigeria.
- Nigerian Copyright Commission.
- National Counter Terrorism Centre.
- Chief Judge of Lagos State.
- Violence Against Persons Prohibition Department.
- Nigerian Police Force National Cybercrime Centre.
- Department of State Services.

Requests from authorities



Requests from non-governmental entities



Markets report continued



Rwanda



MTN has been present in Rwanda since 1998 and has approximately 7.63 million subscribers. In 2024, MTN's revenue in Rwanda was R2.9 billion.

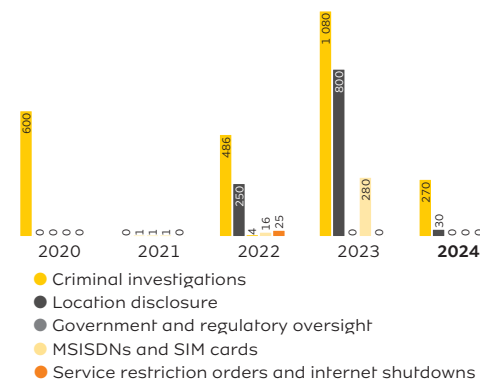
Regulatory framework

- Law relating to the protection of personal data and privacy No. 058_2021 of 13 October 2021.
- Cybersecurity Regulation No. 010/R/CR-CSI/RURA/020 of 29 May 2020.
- Law relating to Access to Information, 2013.
- Prime Minister's Order No. 028/03 of 28 June 2024 determining the regulatory authority for gaming activities.
- Law No. 66/2018 of 30 August 2018 regulating labour in Rwanda.
- Ministerial Order determining the modalities of facilitating persons with disabilities to easily access employment, 2009.
- Ministerial Instructions No. 001/MINICT/2024 of 2024 on child online protection.
- Regulation No. 18/R/SM-ICT/RURA/2024 of 9 August 2024 governing SIM card registration in Rwanda.
- Law No. 017/2021 of 3 March 2021 relating to financial service consumer protection.
- Regulation No. 50 of 2022 on cybersecurity in regulated institutions.

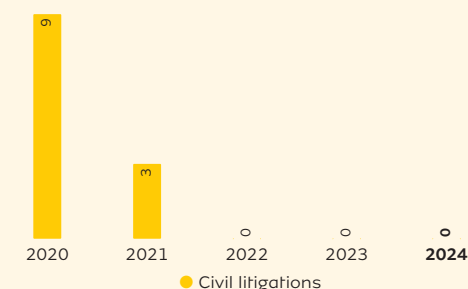
Authorities

- National Cyber Security Authority (NCSA).
- Office of the Ombudsman.
- Rwanda Development Board (RDB).
- Ministry of Public Service and Labour.
- Minister of Culture and Sports.
- Ministry of Information Communication Technology and Innovation (MINICT).
- Rwanda Utilities Regulatory Authority (RURA).
- National Bank of Rwanda.
- Capital Market Authority.

Requests from authorities



Requests from non-governmental entities



Markets report continued



South Africa



MTN has been present in South Africa since 1994 and has approximately 39.8 million subscribers. In 2024, MTN's revenue in South Africa was R92 billion.

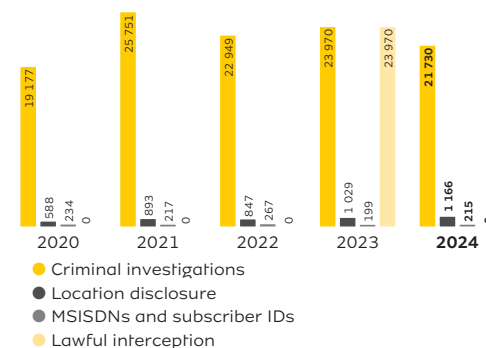
Regulatory framework

- Constitution of the Republic of South Africa, 1996.
- Promotion of Access to Information Act, No 2 of 2000.
- Regulation of Interception of Communications and Provision of Communication-related Information Act, No 70 of 2002.
- Certificate of Exemption in terms of section 46(3) of the Regulation of Interception of Communication and Provisions of Communication-related Information Act, 2002.
- Electronic Communications and Transactions Act, No 25 of 2002.
- Electronic Communications Act, No 36 of 2005.
- Consumer Protection Act, No 68 of 2008.
- Cybercrimes Act, No 19 of 2020.
- Protection of Personal Information Act, No 4 of 2013 (POPIA).
- Guidance Note on Direct Marketing in terms of the Protection of Personal Information, 2024.
- Film and Publication Amendment Act, No 65 of 1996, as amended by the Films and Publications Amendment Act, No 11 of 2019.

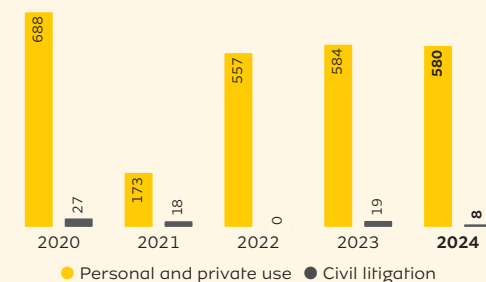
Authorities

- Department of Justice and Constitutional Development.
- South African Human Rights Commission.
- National Prosecuting Authority of South Africa.
- South African Police Services.
- South African National Defence Force.
- Film and Publications Board.
- State Security Agency.
- Information Regulator (South Africa).
- Independent Communications Authority of South Africa.
- South African judiciary or courts.

Requests from authorities



Requests from non-governmental entities



Markets report continued



South Sudan



MTN has been present in South Sudan since 2011 and has approximately 3.3 million subscribers. In 2024, MTN's revenue in South Sudan was R13.3 billion.

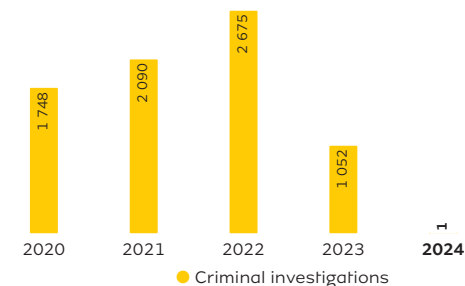
Regulatory framework

- The Transitional Constitution of the Republic of South Sudan, 2011.
- Right of Access to Information Act, 2013.
- National Communication Act, 2012.
- The Penal Code, 2008.
- National Communications Frequency Regulation, 2016.
- National Communications Tariffs Regulation, 2016.
- National Communications Dispute Resolution Regulation, 2016.
- National Communications Standards, Specifications and Type Approval Regulation, 2016.
- National Communications Inspection, Monitoring and Enforcement Regulation, 2016.
- National Communications Numbering Regulation, 2016.
- National Communications Competition Regulation, 2016.
- National Communications Licensing Regulation, 2016.
- National Security Service Act, 2014.
- The Electronic Money Regulation of South Sudan, 2017.
- The Anti- Money Laundering and Counter-Terrorist Financing Act, 2012.
- The Cybercrimes and Computer Misuse Provisional Order, 2021.
- Child Act, 2008.

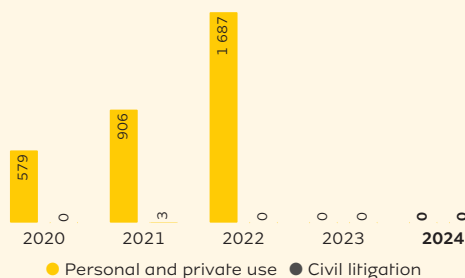
Authorities

- Ministry of Information Communication Technology & Postal Services.
- Information Commission.
- National Communication Authority.
- High Court.
- The Supreme Court.
- The Bank of South Sudan.
- The Financial Intelligence Unit.
- Independent Child Commission.

Requests from authorities



Requests from non-governmental entities



Markets report continued



Uganda



MTN has been present in Uganda since 1998 and has approximately 22 million subscribers. In 2024, MTN's revenue in Uganda was R12.3 billion.

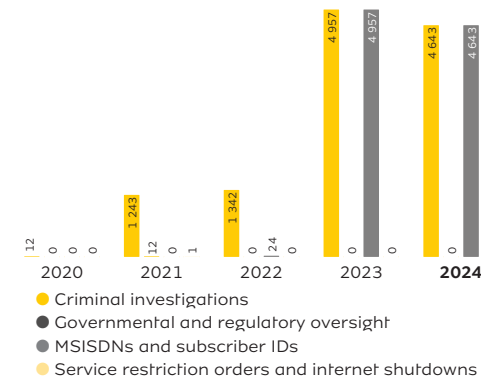
Regulatory framework

- The Constitution of the Republic of Uganda, 1995.
- The Uganda Communications Act, Cap. 103.
- The National Payment Systems Act, Cap.59.
- The Anti-Money Laundering Act, Cap. 118.
- The Regulation of Interception of Communications Act, Cap. 101.
- The Data Protection and Privacy Act, Cap. 97.
- The Computer Misuse Act, Cap. 96.
- The Electronic Transactions Act, Cap. 99.
- The Anti-Pornography Act, Cap. 119.
- The Anti-Terrorism Act, Cap. 120.
- The Electronic Signatures Act, Cap 98.
- The Anti-Homosexuality Act, Cap. 117.
- The Data Protection and Privacy Regulations, 2020.
- The Uganda Communications (Intelligent Network Monitoring System) Regulations, 2019.
- Uganda Communications (Centralised Equipment Identification Register) Regulations 2019.
- The Uganda Communications (Text and Multimedia Messaging) Regulations, 2019.
- The Uganda Communications (Consumer Protection) Regulations, 2019.
- The Uganda Communications (Content) Regulations, 2019.
- The Uganda Communications (Emergency Response Team) Regulations, 2019.
- The Uganda Communications (Computer Emergency Response Team) Regulations, 2019.
- The Regulation of Interception of Communications Regulations, 2023.
- The National Environment (Audit) Regulations, 2020.

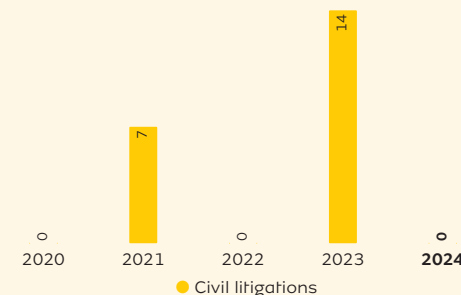
Authorities

- Uganda Police Force.
- Uganda Communications Commission.
- National Information Technology Authority.
- Bank of Uganda.
- Ministry of Internal Affairs.
- Ministry of Information and Communications Technology and National Guidance.
- Courts of Law.
- Ministry of Justice and Constitutional Affairs.
- Financial Intelligence Authority.
- Personal Data Protection Office.
- Uganda People's Defence Forces.
- Internal Security Organisation.
- External Security Organisation.
- National Environment Management Authority.
- Directorate of Public Prosecutions.

Requests from authorities



Requests from non-governmental entities



Markets report continued



Zambia



MTN has been present in Zambia since 1998 and has approximately 6.5 million subscribers. In 2024, MTN's revenue in Zambia was R4.9 billion.

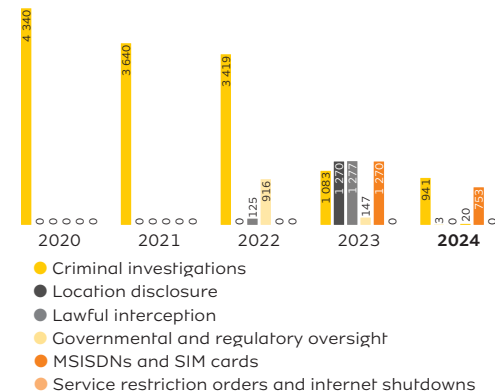
Regulatory framework

- The Constitution of Zambia (Amendment) Act No. 2 of 2016.
- Electronic Communications and Transactions Act No. 4 of 2021.
- The Cybersecurity and Cyber Crimes Act No. 2 of 2021.
- The Data Protection Act No. 3 of 2021.
- The Financial Intelligence Centre Act No. 46 of 2010, as amended by Act No. 4 of 2016 and Act No. 16 of 2020.
- The Zambia Information and Communication Technology Authority Agency Network Licence Standard Terms and Conditions.
- The Children's Code Act No. 12 of 2022.
- The Electronic Communications and Transactions (General) Regulations, Statutory Instrument No. 71 of 2011 issued pursuant to the Electronic Communications and Transactions Act No. 21 of 2009.
- The Access to Information Act No. 24 of 2023.
- The Information and Communication Technologies (Telecommunication Traffic Monitoring) Regulations.
- Statutory Instrument No. 80 of 2015, issued pursuant to the Electronic Communications and Transactions Act No. 21 of 2009.

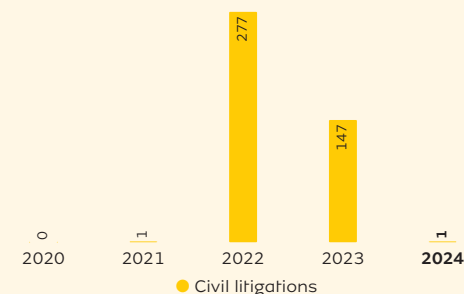
Authorities

- Zambia Information and Communications Technology Agency.
- Zambia Police Service.
- Office of the Public Protector.
- Anti-Corruption Commission.
- Zambia Security Intelligence Service.
- Drug Enforcement Commission.
- Human Rights Commission.
- Financial Intelligence Centre.
- Anti-Money Laundering Investigations Unit.
- Zambia Revenue Authority.
- Department of Child Development.
- Office of the Data Protection Commissioner.

Requests from authorities



Requests from non-governmental entities



Looking forward

As we look ahead to 2025, MTN remains fully committed to respecting digital human rights in a world facing significant and rapid geopolitical shifts, challenges and an evolution of technological advances. We believe that our duty to respect human rights is not just a legal obligation but a moral one too. As a Pan-African company that believes that every African deserves the benefit of a modern, connected life. As a telecommunications company, we believe that the services we provide enable the enjoyment of digital human rights.

To ensure our continued respect for digital human rights, we will continue to implement our digital human rights due diligence process to identify and mitigate digital human rights risks and impacts.

We will develop and amplify our efforts to protect those who are vulnerable online, particularly children, through ongoing enhancements to our Help Children Be Children campaign and our partnership with the Internet Watch Foundation.

In the upcoming year we will be focusing on the following:

• Technological advances and its impact on human rights

We note that technology is advancing and evolving and our efforts at MTN will ensure that Africans are on the technological journey with the rest of the world.

In particular, the rise of digital technologies and advancements brings about concerns surrounding data privacy and surveillance. Additionally, the use of AI in surveillance and decision making, as well as its potential for bias and discrimination, is a human rights concern. MTN will be taking extra precautions to monitor these human rights risks in 2025.

We will ensure that sufficient guardrails are in place to protect human rights with the use of this technology. MTN will also take the lead in spearheading AI regulation and adoption on the African continent.

• The potential impacts of geopolitical shifts in 2025

Shifts are occurring politically around the world, leading to the emergence of new or different global powers, which highlights the increasing importance of respecting human rights. We see this as a major issue in 2025. At MTN, we will monitor the impact of geopolitical shifts and ensure that we adjust our strategy to ensure that human rights are respected throughout the course of our business operations.

• Government ordered service restrictions

We noted that there was a rise in social conflict in 2024 as a result of many social issues, such as the rising cost of living and political shifts. This risk will continue to be an issue that we will be monitoring in 2025. The rise in social conflicts, as well as geopolitical shifts and instability, increases the risk of government order requests to suspend services or throttle websites, which impedes human rights, such as freedom of expression.

At MTN, we will continue to monitor this risk and will stringently apply our Digital Human Rights Policy and due diligence process to prevent shutdowns and/or mitigate the impacts on human rights that emanate from this risk.

International frameworks, such as the United Nations Guiding Principles on Business and Human Rights, will continue to guide us, while we remain committed to complying with domestic laws and navigating the complexities of the telecommunications market in a rapidly changing world.



Glossary

AI	Artificial intelligence
CEO	Chief Executive Officer
CRO	Chief Risk Officer
ERM	Enterprise risk management
ESG	Environmental, Social and Governance
GNI	Global Network Initiative
GSMA	Global System for Mobile Communications Association
ICT	Information and Communication Technology
IWF	Internet Watch Foundation
MENA	Middle East and North Africa
MSISDN	Mobile Station International Subscriber Directory Number
SEA	Southern and East Africa
SDGs	Sustainable Development Goals
SESCO	Social, Ethics and Sustainability Committee
SIM	Subscriber Identification Module
UNGC	United Nations Global Compact
WECA	West and Central Africa



Administration

MTN Group Limited

Incorporated in the Republic of South Africa

Company registration number:

1994/009584/06

ISIN: ZAE000042164

Share code: MTN

Board of Directors

MH Jonas

KDK Mokhele

RT Mupita¹

TBL Molefe¹

NP Gosa

S Gwala (appointed 1 January 2025)

S Kheradpir² (retired 31 March 2025)

SN Mabaso-Koyana

SP Miller³

CWN Molope

N Newton-King

T Pennington⁴

VM Rague⁵

SLA Sanusi⁵

NL Sowazi

¹ Executive

² American

³ Belgian

⁴ British

⁵ Nigerian

⁶ Kenyan

Group Company Secretary

PT Sishuba-Bonoyi

Private Bag X9955, Cresta, 2118

Registered office

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Fairland

Gauteng, 2195

American depository receipt (ADR) programme

A sponsored ADR facility is in place

Cusip No. 62474M108

ADR to ordinary share 1:1

Depository:

The Bank of New York Mellon

101 Barclay Street, New York NY, 10286, USA

MTN Group sharecare line

Toll free: 0800 202 360 or +27 11 870 8206

if phoning from outside South Africa

Transfer secretaries

Computershare Investor Services

Proprietary Limited

Registration number 2004/003647/07

Rosebank Towers, 15 Biermann Avenue

Rosebank, 2196

PO Box 61051, Marshalltown, 2107

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Ernst & Young Inc.

102 Rivonia Road, Sandton, Johannesburg,

South Africa, 2196

Lead sponsor

J.P. Morgan Equities (SA) Proprietary Limited

1 Fricker Road, cnr Hurlingham Road,

Illovo, 2196

Joint sponsor

Tamela Holdings Proprietary Limited

First Floor, Golden Oak House,

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Website: <http://www.mtn.com>

Date of release: 29 April 2025

Forward looking information

Any forward looking financial information disclosed in this report has not been reviewed or audited or otherwise reported on by our external auditor. Opinions and forward looking statements expressed in this report represent those of the company at the time. Undue reliance should not be placed on such statements and opinions because by nature, they are subjective to known and unknown risk and uncertainties and can be affected by other factors that could cause actual results and company plans and objectives to differ materially from those expressed or implied in the forward looking statements.

Neither the company nor any of its respective affiliates, advisers or representatives shall have any liability whatsoever (based on negligence or otherwise) for any loss howsoever arising from any use of this report or its contents or otherwise arising in connection with this presentation and do not undertake to publicly update or revise any of its opinions or forward looking statements whether to reflect new information or future events or circumstances otherwise.

Our reporting suite reports with reference to the following standards and frameworks

The Integrated Reporting Framework	IR	AFS				
Companies Act, No 71 of 2008 (as amended)	IR	AFS	SR	KIV		
JSE Listings Requirements	IR	AFS	SR	KIV		
FTSE/JSE Responsible Investment Index	IR	SR	KIV	TR	CDP	
King IV™^ Principles	IR	AFS	SR	KIV	TR	
International Financial Reporting Standards (IFRS)				IR	AFS	
UN GRI				IR	SR	
JSE Sustainability Disclosure Guidance				IR	SR	
Global System for Mobile Communications Association (GSMA) ESG Metrics				SR	TR	
Sustainability Accounting Standards Board (SASB) Telecommunication Services industry				IR	SR	
SDGs				IR	SR	
UN Global Compact (UNGC)				SR	TR	
UN Guiding Principles on Business and Human Rights				SR	TR	
CDP				SR	CDP	
IFRS® Sustainability Disclosure Standards				IR	SR	
IFRS® Climate-related Disclosures				SR	CDP	CR

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