






# UN Global Reporting Initiative (GRI) 4 report

We prepare our report in accordance with Global Reporting Initiative (GRI) G4 guidelines, selecting core indicators material to our business. In reviewing this report, the following sources (document or web link) must be referenced in order to comprehensively assess our response:

- MTN Group integrated report 2017 (IR) 
- MTN Group sustainability report 2017 (SR) 
- MTN Group Carbon Disclosure Project report 2017 (CDP) 
- MTN Group Global Compact Communication of Progress Report 2017 (UNGC) 
- MTN Group website  ([www.mtn.com](http://www.mtn.com))

Index	Description	Information (document or web link)	Page(s)
<b>STRATEGY AND ANALYSIS</b>			
G4-1	CEO statement	<ul style="list-style-type: none"> <li>• IR: Q&amp;A with Group President and CEO</li> <li>• SR: Group President and CEO's message on sustainability</li> </ul>	30 – 31 5 – 8
G4-2	Impacts, risks and opportunities on stakeholders and financial performance	<ul style="list-style-type: none"> <li>• IR: Top risks to value creation</li> </ul>	20 – 21
<b>ORGANISATIONAL PROFILE</b>			
G4-3	Name of reporting organisation	<ul style="list-style-type: none"> <li>• MTN Group Limited</li> </ul>	
G4-4	Primary brands, products, services	<ul style="list-style-type: none"> <li>• IR: What we offer</li> <li>• <a href="https://www.mtn.com/en/what-we-do/Pages/default.aspx">https://www.mtn.com/en/what-we-do/Pages/default.aspx</a></li> </ul>	3
G4-5	Location of headquarter's operating structure	<ul style="list-style-type: none"> <li>• 216 – 14th Avenue, Fairland, 2195, South Africa</li> </ul>	
G4-6	Geographic scope/ map of operations	<ul style="list-style-type: none"> <li>• IR: Where we operate and how we performed</li> <li>• <a href="https://www.mtn.com/en/mtn-group/about-us/our-story/Pages/where-we-are.aspx">https://www.mtn.com/en/mtn-group/about-us/our-story/Pages/where-we-are.aspx</a></li> </ul>	8 – 9
G4-7	Nature of ownership and legal form	<ul style="list-style-type: none"> <li>• <a href="https://www.mtn.com/en/investors/Pages/default.aspx">https://www.mtn.com/en/investors/Pages/default.aspx</a></li> </ul>	
G4-8	Markets served, sectors served and profile of customers/ beneficiaries, profile of customer base	<ul style="list-style-type: none"> <li>• <a href="https://www.mtn.com/en/what-we-do/Pages/default.aspx">https://www.mtn.com/en/what-we-do/Pages/default.aspx</a></li> </ul>	
G4-9	Scale of the reporting organisation including number of employees and operations	<ul style="list-style-type: none"> <li>• IR: About this report</li> <li>• SR: Scope and boundaries</li> </ul>	Inside front cover Inside front cover
G4-10	Number of employees by employment contract and gender	<ul style="list-style-type: none"> <li>• IR: How we sustain value</li> <li>• SR: Annual sustainability statements</li> </ul>	14 51
G4-11	Percentage of employees covered by collective bargaining agreements	<ul style="list-style-type: none"> <li>• SR: Annual sustainability statements</li> </ul>	51

Index	Description	Information (document or web link)	Page(s)
<b>ORGANISATIONAL PROFILE</b> <small>continued</small>			
G4-12	Describe the organisation's supply chain (types, number of, and locations of suppliers including any sector specific characteristics of the supply chain)	<ul style="list-style-type: none"> <li>The appointment of suppliers and vendors involves a thorough selection and evaluation process, to ensure the most qualified vendors are selected based on fairness, objectivity, transparency and merit. This process is in line with our supply chain policies and procedures manual, applicable to all MTN operations. All suppliers are required to adhere to our policies, standards and procedures</li> <li><a href="https://www.mtn.com/en/mtn-group/supplier">https://www.mtn.com/en/mtn-group/supplier</a></li> </ul>	
G4-13	Changes occurring within the reporting period regarding size, structure or ownership	<ul style="list-style-type: none"> <li>Annual financial statement at <a href="https://www.mtn.com/en/investors/Pages/default.aspx">https://www.mtn.com/en/investors/Pages/default.aspx</a></li> </ul>	
<b>COMMITMENTS TO EXTERNAL INITIATIVES</b>			
G4-14	How the precautionary approach/principle is addressed	<ul style="list-style-type: none"> <li>Environmental management positions at <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> </ul>	
G4-15	External economic, environmental and social charters or principles subscribed to/endorsed	<ul style="list-style-type: none"> <li>SR: Standards and reporting</li> </ul>	1
G4-16	Memberships of associations and national or international advocacy organisations	<ul style="list-style-type: none"> <li>National Business Initiative</li> <li>Groupe Speciale Mobile Association (GSMA)</li> </ul>	
<b>IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES</b>			
G4-17	Organisational structure	<ul style="list-style-type: none"> <li>IR: Where we operate</li> </ul>	8
G4-18	How report content and aspect boundaries are defined and how the organisation has implemented reporting principles	<ul style="list-style-type: none"> <li>IR: About this report</li> <li>SR: About this report</li> </ul>	Inside front cover 1
G4-19	List all material aspects identified in the process for defining report content	<ul style="list-style-type: none"> <li>IR: Material matters impacting value creation</li> <li>SR: Our approach to sustainability</li> </ul>	16 – 17 3 – 4
G4-20	For each material aspect report the aspect boundary within the organisation	<ul style="list-style-type: none"> <li>SR: About this report</li> </ul>	1

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES</b> <small>continued</small>			
G4-21	For each material aspect report the aspect boundary outside of the organisation	<ul style="list-style-type: none"> <li>SR: About this report</li> </ul>	1
G4-22	Effect of any restatements of information in previous reports, and associated reasons	<ul style="list-style-type: none"> <li>Annual financial statement at <a href="https://www.mtn.com/en/investors/Pages/default.aspx">https://www.mtn.com/en/investors/Pages/default.aspx</a></li> <li>SR: Sustainability value add statement</li> </ul>	51 – 53
G4-23	Significant changes to report content/scope (material aspects) from previous reports	N/A	
<b>STAKEHOLDER ENGAGEMENT</b>			
G4-24	List of stakeholder groups engaged by the organisation	<ul style="list-style-type: none"> <li>IR: Relationships on which we rely to create value</li> <li>SR: About this report</li> </ul>	18 – 20 1
G4-25	How are stakeholders identified?	<ul style="list-style-type: none"> <li>IR: Relationships on which we rely to create value</li> <li>SR: About this report</li> </ul>	18 – 20 1
G4-26	Approaches to stakeholder engagement (who, how, and what outcomes)	<ul style="list-style-type: none"> <li>IR: Relationships on which we rely to create value</li> <li>SR: About this report</li> </ul>	18 – 20 1
G4-27	Stakeholder concerns and how the organisation has responded. Report the stakeholder groups that raised each concern	<ul style="list-style-type: none"> <li>IR: Relationships on which we rely to create value</li> <li>SR: About this report</li> </ul>	18 – 20 1
<b>REPORT PROFILE</b>			
G4-28	Reporting period	<ul style="list-style-type: none"> <li>1 January 2017 to 31 December 2017</li> </ul>	
G4-29	Date of most recent report	<ul style="list-style-type: none"> <li>31 December 2016</li> </ul>	
G4-30	Reporting cycle	<ul style="list-style-type: none"> <li>Annual</li> </ul>	
G4-31	Contact point	<ul style="list-style-type: none"> <li><a href="https://www.mtn.com/Pages/Contact-us.aspx">https://www.mtn.com/Pages/Contact-us.aspx</a></li> </ul>	
<b>REPORT PROFILE: GRI CONTENT INDEX</b>			
G4-32	'In accordance' option chosen, GRI context index chosen, external assurance report	<ul style="list-style-type: none"> <li>'In accordance' – Core</li> <li>GRI context index – G4</li> <li>SR: Annual sustainability statements</li> </ul>	55
G4-33	Policy and current practice on independent assurance, and whether the highest governance body is involved in seeking assurance for the sustainability report	<ul style="list-style-type: none"> <li>Assurance statements are available at <a href="https://www.mtn.com/en/investors/Pages/default.aspx">https://www.mtn.com/en/investors/Pages/default.aspx</a></li> </ul>	

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>GOVERNANCE</b>			
G4-34	Governance structure including highest governance committees, and committees responsible for decision making on economic, environment, and social impacts	<ul style="list-style-type: none"> <li>• IR: Governance</li> <li>• SR: Our approach to sustainability</li> </ul>	56 – 75 3
G4-35	Process for delegating authority for sustainability topics from the highest governance body to senior executives and other employees	<ul style="list-style-type: none"> <li>• SR: Our approach to sustainability</li> </ul>	3
G4-36	Executive level position(s) with responsibility for sustainability topics including reporting lines to highest governance body	<ul style="list-style-type: none"> <li>• SR: Our approach to sustainability</li> </ul>	3
G4-37	Process for consultation between stakeholders and the highest governance body on sustainability topics	<ul style="list-style-type: none"> <li>• SR: Our approach to sustainability</li> </ul>	3
G4-38	Composition of the highest governance body (board) and its committees – detailed	<ul style="list-style-type: none"> <li>• IR: Governance</li> </ul>	56 – 75
G4-39	Is Chairman of highest governance body also an executive officer?	<ul style="list-style-type: none"> <li>• Yes</li> </ul>	
G4-40	Nomination and selection process for highest governance body and committees including criteria such as diversity, independence, and expertise for nominations and selections	<ul style="list-style-type: none"> <li>• IR: Governance</li> </ul>	56 – 75
G4-41	Process followed by the board for managing conflicts of interest	<ul style="list-style-type: none"> <li>• IR: Governance</li> </ul>	56 – 75

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>GOVERNANCE</b> <small>continued</small>			
G4-42	Highest governance body's role in development, and approval of organisation's value statements, policies and strategies related to sustainability	<ul style="list-style-type: none"> <li>IR: Governance – Social and Ethics Committee</li> <li>SR: Our approach to sustainability</li> </ul>	62 3
G4-43	Measures taken to develop and enhance board's knowledge of sustainability	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
G4-44	Processes for evaluating board's sustainability performance and actions taken in response to evaluations	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
G4-45	Board's oversight of sustainability	<ul style="list-style-type: none"> <li>IR: Governance – Social and Ethics Committee</li> <li>SR: Our approach to sustainability</li> </ul>	62 3
G4-46	Board's role in reviewing effectiveness of risk management processes	<ul style="list-style-type: none"> <li>IR: Governance – Risk Committee</li> <li>IR: Our approach to risk management</li> </ul>	60 – 61 76 – 78
G4-47	Report the frequency of the board's review of economic, environmental and social impacts, risks and opportunities	<ul style="list-style-type: none"> <li>SR: Our approach to sustainability</li> </ul>	3
G4-48	Highest committee or position that approves sustainability report and ensures all material aspects are covered	<ul style="list-style-type: none"> <li>IR: Governance: Social and Ethics Committee</li> <li>SR: Our approach to sustainability</li> </ul>	62 3
G4-49	Process for communicating critical concerns to the board	<ul style="list-style-type: none"> <li>IR: Our approach to risk management</li> </ul>	60 – 61
G4-50	Nature and number of critical concerns communicated to board, and mechanisms used to resolve	<ul style="list-style-type: none"> <li>On a continuous basis, a red flag report on all compliance risks, issues and incidents being faced by the various operating companies within MTN's footprint is compiled. The report informs senior management about actions taken to address and resolve each matter noted, and supports proactive management of future compliance obligations. Due to the size of the report, each matter is assessed and prioritised, in accordance with a risk assessment methodology, and is then reported to the Group Executive Committee monthly. The full red flag report is continuously updated and is made available to members of the committee on request. The report is also made available to the Group Risk, Compliance and Corporate Governance Committee on a quarterly basis, highlighting priority red flags</li> <li>On a monthly basis, material regulatory matters, and issues of importance affecting the company and its stakeholders, are compiled and presented to the Group Executive Committee by the group regulatory and corporate affairs officer. Reports also include mitigation and resolution mechanisms</li> <li>On a quarterly basis, factors and stakeholder issues that influence MTN's reputation, including customer experiences (quality of service, communication costs, etc.), digital human rights, MTN as an employer, regulatory, governance and ethical matters, and the impact of sites and towers is presented to the Group Social and Ethics Committee. This report also includes engagements planned to resolve issues</li> </ul>	

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>GOVERNANCE</b> <small>continued</small>			
G4-51	Report remuneration policies for highest governance body and senior executives, and describe the link between remuneration and leadership performance	<ul style="list-style-type: none"> <li>Remuneration report</li> </ul>	79 – 83
G4-52	Process for determining remuneration	<ul style="list-style-type: none"> <li>Remuneration report</li> </ul>	79 – 83
G4-53	How are stakeholders' views taken into account regarding remuneration	<ul style="list-style-type: none"> <li>The annual group culture audit (GCA), conducted among employees, takes into account the aspect of remuneration. The GCA indicates the sustainable engagement of employees</li> </ul>	
G4-54	Ratio of total annual compensation for organisation's highest-paid individual in each country to median annual total compensation for all employees (excluding highest paid) in that country	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
G4-55	Ratio of percentage increase in annual total compensation for organisation's highest-paid individual in each country to median percentage increase for all employees (excluding highest paid) in that country	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
<b>ETHICS AND INTEGRITY</b>			
G4-56	Organisation's values, principles, standards, norms of behaviour and codes of conduct/ethics	<ul style="list-style-type: none"> <li>IR: Who we are</li> <li>SR: Who we are  <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a> <ul style="list-style-type: none"> <li>Group social and ethics statement</li> <li>Anti-corruption</li> <li>Conflicts of interest</li> <li>Digital human rights</li> <li>Networks and environment</li> </ul> </li> <li><a href="https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/default.aspx">https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/default.aspx</a></li> </ul>	<p>2</p> <p>2</p>

Index	Description	Information (document or web link)	Page(s)
<b>ETHICS AND INTEGRITY</b> <small>continued</small>			
G4-57	Internal and external mechanisms for seeking advice on ethical and lawful behaviour	<ul style="list-style-type: none"> <li>An internal ethics discussion platform exists on the MTN intranet, 'MTN Connect'</li> <li>A closed group discussion platform exists on the intranet (MTN Connect) specifically for use by ethics champions at group and opco level</li> <li>An ethics advice line (not anonymous) exists: MTNGroupEthics@mtn.com</li> <li>An anonymous fraud reporting line exists (anonymous@tip-offs.net)</li> <li>At organisational level MTN has a strategic partnership with The Ethics Institute with whom the company has organisational membership; this partnership is crucial for ethics advice required at a systemic level</li> <li>Annually a perception-based, anonymous organisation climate/culture survey is conducted across the group of companies, with values and corporate integrity being two of the 16 dimensions probed</li> <li>Ethics task teams at group and operations level consisting of trained ethics champions from various disciplines (e.g. finance, HR, procurement, business risk management, corporate affairs, etc.) who are available to field ethics enquiries</li> <li>The MTN Group has 27 certified ethics officers (registered with the Ethics Institute of South Africa) from across various organisational disciplines, e.g. procurement, business risk management, finance (group tax), legal and HR who provide assistance and advice at both personal level and systemic level to all opcos in terms of ethics management practice</li> <li>Ethics-related priority policies as well as the codes (code of ethics, social and ethics statement and employee conduct pledge) direct behaviour and practice, and contain directives on routes to follow for the reporting of ethical breaches</li> <li>An issue management council exists at head office as well as in most country operations</li> </ul>	
G4-58	Internal and external mechanisms for reporting concerns about unethical or unlawful behaviour, escalations, and whistle blowing	<ul style="list-style-type: none"> <li>All ethics-related policies indicate the appropriate route to follow with regard to the reporting of ethics policy breaches, i.e. line manager/head of function/Group Chief Officer (HR and Corporate Affairs or Group Chief Officer Business Risk Management), or the whistle-blowing line (Tip-offs Anonymous (anonymous@tip-offs.net))</li> <li>An ethics advice line exists on the intranet (MTN Connect) – a social platform where employees may raise issues for purposes of gaining advice</li> <li>A dedicated mailbox (MTNGroupEthics@mtn.com) in use for all staff to raise issues of concern or ask advice privately</li> <li>IR: Governance: Audit Committee</li> <li>IR: Our approach to risk management – fraud risk management</li> <li>SR: Annual sustainability statements (calls to whistle-blower line)</li> </ul>	67 78 52
<b>CATEGORY: Economic</b> <b>ASPECT: Economic performance</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li><a href="https://www.mtn.com/en/investors/Pages/default.aspx">https://www.mtn.com/en/investors/Pages/default.aspx</a></li> </ul>	
G4-EC1	Direct economic value generated and distributed (revenues, operating costs, wages, benefits, loans)	<ul style="list-style-type: none"> <li>IR: Key financial tables</li> <li>Annual financial statements on <a href="https://www.mtn.com/en/investors/Pages/default.aspx">https://www.mtn.com/en/investors/Pages/default.aspx</a></li> </ul>	36 – 38
G4-EC2	Climate change-related financial implications and risks and opportunities	<ul style="list-style-type: none"> <li>SR: Energy and climate risks, mitigation and opportunities</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	34

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Economic</b>			
<b>ASPECT: Economic performance</b> continued			
G4-EC3	Defined benefit plan obligations coverage	<ul style="list-style-type: none"> <li>IR: Remuneration report</li> </ul>	79 – 83
G4-EC4	Financial assistance from government	<ul style="list-style-type: none"> <li>In some countries, standard government rebates to encourage investment in national skills development and training is available to employers. In South Africa, for example, rebates at rates determined by the government are available on payments made in terms of the Skills Development Levies Act (where companies are registered with the South African Revenue Service, have a payroll above a government-determined threshold, and make payments of 1% of monthly payroll costs to the national Skills Development Levy)</li> </ul>	
<b>CATEGORY: Economic</b>			
<b>ASPECT: Market presence</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li><a href="https://www.mtn.com/en/investors/Pages/default.aspx">https://www.mtn.com/en/investors/Pages/default.aspx</a></li> </ul>	
G4-EC5	Ratios of standard entry level wage compared to local minimum wage (by gender)	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
G4-EC6	Proportions of senior management hired from local communities	<ul style="list-style-type: none"> <li>We currently report on the percentage of expatriate employees, but do not indicate this by management level</li> <li>SR: Annual sustainability statements</li> </ul>	51 – 53
<b>CATEGORY: Economic</b>			
<b>ASPECT: Indirect economic impacts</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>IR: How we create value using the six capitals</li> <li>SR: Annual sustainability statements</li> <li><a href="https://www.mtn.com/en/mtn-group/social-investments/Pages/default.aspx">https://www.mtn.com/en/mtn-group/social-investments/Pages/default.aspx</a></li> </ul>	14 – 15 51 – 53
G4-EC7	Extent and impacts of development of significant infrastructure investments and services and whether they are commercial, in kind, or <i>pro bono</i> engagements	<ul style="list-style-type: none"> <li>IR: How we create value using the six capitals</li> <li>SR: Sustainable economic value</li> <li><a href="https://www.mtn.com/en/mtn-group/social-investments/Pages/default.aspx">https://www.mtn.com/en/mtn-group/social-investments/Pages/default.aspx</a></li> </ul>	14 – 15 9 – 27
G4-EC8	Significant indirect economic impacts, including extent of impacts	<ul style="list-style-type: none"> <li>Not available</li> </ul>	



Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Economic</b>			
<b>ASPECT: Procurement practices</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>The group Sourcing Committee is responsible for driving efficient procurement processes at group and in the operations. While operations are encouraged to source products and services centrally to achieve desired savings, local procurement in support of economic development is an important feature for all operations. The group's supplier code of conduct defines minimum standards that our suppliers and their employees and subcontractors must respect and adhere to when conducting business with MTN</li> <li><a href="https://www.mtn.com/en/mtn-group/supplier/Pages/default.aspx">https://www.mtn.com/en/mtn-group/supplier/Pages/default.aspx</a></li> </ul>	
G4-EC9	Policies, practices, and proportion of spending on locally based suppliers	<ul style="list-style-type: none"> <li>SR: Annual sustainability statements (black economic empowerment)</li> <li><a href="https://www.mtn.com/en/mtn-group/supplier/group-scm-overview/Pages/Local-supplier-empowerment.aspx">https://www.mtn.com/en/mtn-group/supplier/group-scm-overview/Pages/Local-supplier-empowerment.aspx</a></li> </ul>	53
<b>CATEGORY: Environmental</b>			
<b>ASPECT: Materials</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>The group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations</li> <li><a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> </ul>	
G4-EN2	Materials used: weight/volume	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – environmental management</li> <li>SR: Annual sustainability statements</li> </ul>	35 – 38 52
<b>CATEGORY: Environmental</b>			
<b>ASPECT: Energy</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>The group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations</li> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52
G4-EN3	Energy consumption within the organisation	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52
G4-EN4	Energy consumption outside the organisation	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52
G4-EN5	Energy intensity	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52
G4-EN6	Reduction of energy consumption (as a result of conservation and efficiency initiatives)	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Environmental</b> <b>ASPECT: Water</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>The group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations</li> <li><a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> <li>Due to the nature of MTN's business and the products and services offered, this indicator is not material. However, as part of the maintaining the ISO 14001 certifications in Cyprus and South Africa, this aspect is addressed. Other operations, while not ISO 14001-certified, maintain safety health and environmental policies, and as part of business plans, all MTN countries of operation are required to identify environmental risks as a focus area in terms of the group's principal risks. A number of MTN operations are currently implementing the group Green Office toolkit, for water saving opportunities at offices and similar premises</li> <li>SR: Eco-responsibility – environmental management</li> </ul>	35 – 38
<b>CATEGORY: Environmental</b> <b>ASPECT: Biodiversity</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>The group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations</li> <li>SR: Eco-responsibility – environmental management</li> <li>Networks and environment – <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> </ul>	35 – 38
<b>CATEGORY: Environmental</b> <b>ASPECT: Emissions</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>The group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations</li> <li>SR: Eco-responsibility – energy and climate</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34
G4-EN15	Direct GHG emissions (scope 1)	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52
G4-EN16	Energy indirect GHG emissions (scope 2)	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52
G4-EN17	Other indirect GHG emissions (scope 3)	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52
G4-EN18	GHG emissions intensity	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Environmental</b>			
<b>ASPECT: Emissions</b> continued			
G4-EN19	Reduction of GHG emissions	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52
G4-EN20	Emissions of ozone depleting substances (ODS)	<ul style="list-style-type: none"> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	
<b>CATEGORY: Environmental</b>			
<b>ASPECT: Effluents and waste</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>The group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations</li> <li><a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> <li>SR: Eco-responsibility – environmental management</li> <li>Due to the nature of MTN's business and the products and services offered, this indicator is not material. However, as part of the maintaining the ISO 14001 certifications in Cyprus and South Africa, this aspect is addressed. Other operations, while not ISO 14001-certified, maintain safety health and environmental policies, and as part of business plans, all MTN countries of operation are required to make environmental risks as focus area in terms of the group's principal risks. A number of MTN operations are currently implementing the group Green Office toolkit, which includes addressing waste outputs and reducing consumption of resources that may lead to waste creation. The group is also working on the recycling of electronic and electrical waste (WEEE or e-waste) in both upstream and downstream processes. Initiatives are at various stages of maturity or have been completed (when in partnership) including in Benin, Cameroon, Cyprus, Iran, Nigeria and South Africa</li> <li>SR: Eco-responsibility – environmental management</li> </ul>	35 – 38
G4-EN23	Total weight of waste by type and disposal method	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – environmental management</li> <li>SR: Sustainability value add statement</li> </ul>	35 – 38 52
G4-EN24	Total number and volume of significant spills	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
G4-EN25	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII and percentage of transported waste shipped internationally	<ul style="list-style-type: none"> <li>The most material waste subject to this convention is electronic and electrical waste (e-waste or WEEE). In South Africa, e-waste is processed locally to the greatest possible extent, by MTN's e-waste handlers. MTN's fractions are ultimately mixed with e-waste from other companies and sources, and we are not aware of the weight of fractions shipped internationally. Short-term public awareness and e-waste collection campaigns resulting in collection and shipping of e-waste from Benin and Ivory Coast to South Africa in the past have been subject to the Convention. Local e-waste management in partnership with recyclers will commence in Ivory Coast in 2018. Supplier take-back agreements are in place in Cameroon, and safe disposal guidelines for batteries have been implemented in Iran. A public private partnership addressing extended producer responsibilities has been developed in Nigeria. For tonnage, see references below</li> <li>SR: Eco-responsibility – environmental management</li> <li>SR: Annual sustainability statements</li> </ul>	35 – 38 52

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Environmental</b>			
<b>ASPECT: Effluents and waste</b> continued			
G4-EN26	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the organisation's discharges of water and runoff	<ul style="list-style-type: none"> <li>Networks and environment: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> </ul>	
<b>CATEGORY: Environmental</b>			
<b>ASPECT: Products and services</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>The Global e-Sustainability Initiative has assessed that ICT-enabled solutions can help the world achieve carbon abatements in the region of 9,6 GtCO<sub>2</sub>e or 16,5% of global outputs by 2020. Although our solutions in this domain are relatively small, opportunities are growing rapidly. See reference links below</li> <li>SR: Sustainable economies – powering communications and IoT</li> <li>See case studies at <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/default.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/default.aspx</a></li> </ul>	14 – 16 and 26 – 27
G4-EN28	Percentage of products sold and their packaging materials that are reclaimed by category	<ul style="list-style-type: none"> <li>SR: Eco-responsibility – environmental management</li> <li>SR: Annual sustainability statements</li> </ul>	35 – 38 52
<b>CATEGORY: Environmental</b>			
<b>ASPECT: Compliance</b>			
	Describe the approach to managing and reporting on compliance (with environmental laws and regulations)	<ul style="list-style-type: none"> <li>The group's legal, regulatory and compliance functions in each country of operation are jointly responsible for oversight and reports on non-compliances and fines issued. Material instances of non-compliance and fines may also be reported via the group's reputational issues and red flag reports, to group management functions and executive structures</li> </ul>	
G4-EN29	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	<ul style="list-style-type: none"> <li>Not available</li> </ul>	

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Environmental</b> <b>ASPECT: Transport</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>Although transportation is not a source of significant environmental impact and is not deemed material, greenhouse gas emissions associated with transport are quantified</li> <li>SR: Eco-responsibility – energy and climate</li> <li>SR: Annual sustainability statements</li> <li>CDP report: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx</a></li> <li>Latest group CDP report: <a href="http://www.cdproject.net">www.cdproject.net</a></li> </ul>	30 – 34 52
<b>CATEGORY: Environmental</b> <b>ASPECT: Overall</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>The group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations</li> <li><a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> <li>IR: Governance – Social and Ethics Committee</li> <li>Networks and environment: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> <li>Mobiles and health: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> </ul>	62
<b>CATEGORY: Social – labour practices and decent work</b> <b>ASPECT: Employment</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>Our employment practices are guided by the international and local labour laws that seek to protect the rights of both the employer and employee in the workplace. Detailed monthly reports of various aspects are submitted to the Group Chief Human Resources Officer. Annual performance is presented in the Group's UN Global Compact Communication of Progress report</li> <li>SR: The workplace</li> </ul>	47 – 49
G4-LA1	Number and rates of employee hires and turnover, by age group, gender, and region	<ul style="list-style-type: none"> <li>Partial information is available, as indicated in the SR: Annual sustainability statements</li> </ul>	53
G4-LA2	Benefits provided to full-time employees that are not provided to temporary/part-time employees, by significant locations of operations	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
G4-LA3	Return to work and retention rates after parental leave, by gender	<ul style="list-style-type: none"> <li>Not available</li> </ul>	

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Social – labour practices and decent work</b> <b>ASPECT: Labour/management relations</b>			
	Describe the approach to management of labour relations and how this is reported on	<ul style="list-style-type: none"> <li>Retrenchments are a result of organisational restructuring. All organisational restructures follow a strict consultation with affected staff, and with reference to local labour regulations. During this process, employees have the opportunity to interrogate the changes and offer suggestions to which management can apply their minds. Should retrenchment still be necessary after thorough consultation, affected employees are informed in person, and the discussion is confirmed in the form of a letter to the employee</li> </ul>	
G4-LA4	Report minimum notice periods regarding significant operational changes as well as whether these are specified in collective agreements	<ul style="list-style-type: none"> <li>Employees are notified as soon as possible of restructuring processes within the organisation if considered. This follows a consultation processes. Once an employee has been confirmed for retrenchment, he/she is given at least one month's notice. This notice period may even be longer than one month, as determined by the various labour laws (which always state the minimum notice period) applicable in the countries in which MTN operates. It is important to note that MTN has a very generous retrenchment policy relative to severance pay</li> </ul>	
	Describe the approach to managing and reporting on occupational health and safety within the organisation	<ul style="list-style-type: none"> <li>SR: Sustainable societies – the workplace</li> </ul>	53
G4-LA5	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programmes	<ul style="list-style-type: none"> <li>SR: Sustainable societies – the workplace</li> </ul>	53
G4-LA6	Type of injury and rates of injury, occupational diseases, lost days, absenteeism, and total number of work-related fatalities by region and gender	<ul style="list-style-type: none"> <li>SR: Sustainable societies – the workplace</li> <li>SR: Annual sustainability statements</li> <li>Occupational diseases are not a feature of our business, given the nature of products and services offered</li> <li>Data on lost days is not available, but is deemed not material due to the low rate of workplace-related accidents/injuries</li> </ul>	47 – 49 53

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Social – labour practices and decent work</b> <b>ASPECT: Training and education</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>Employees are actively encouraged to continuously look for opportunities to improve their capabilities and skills through extensive training available digitally, face to face and from other sources supplied by MTN's Academy, or from external accredited and reputable organisations. On a regular basis, MTN Academy compiles internal reports for management on the nature of training undertaken by employees, amount of time spent on each module, and pass-rates. Certain elements of training are mandatory for all employees. Directors also receive regular and informative updates and training on legislative, regulatory, and any other business-related changes throughout their tenure. They are also encouraged to discuss their development needs with the chairman, and are provided with training where necessary</li> <li>SR: Sustainable societies – the workplace</li> </ul>	
G4-LA9	Average hours of training per employee per year (by gender and employee category)	<ul style="list-style-type: none"> <li>SR: Annual sustainability statement</li> </ul>	51
G4-LA10	Report on the type and scope of programmes implemented for employee skills management and lifelong learning	<ul style="list-style-type: none"> <li>While detailed reports are available internally, this information is not available for external reporting currently</li> <li>We provide talent management learning solutions that ensure that we continue to attract, retain and develop the talents of our employees. Our global talent standards are structured to take into account the technical and behavioural requirements for each position, level of work and functional area in our organisation. We offer training and development solutions for business, organisational behaviour, commercial, technology and leadership capabilities</li> <li>SR: Sustainable societies – the workplace</li> </ul>	47 – 49
G4-LA11	Percentage of employees receiving regular performance and career development reviews, by gender and employee category	<ul style="list-style-type: none"> <li>SR: Annual sustainability statement</li> </ul>	51

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Social – labour practices and decent work</b> <b>ASPECT: Diversity and equal opportunity</b>			
	Describe the approach to managing and reporting on diversity and equal opportunity	<ul style="list-style-type: none"> <li>We aim to ensure that our workforce, across our various operations, is representative of the communities in which we operate. This ensures a diverse workforce, and represents gender diversity across sectors. While MTN's retirement age requirement is taken into account, opportunities are available to all age groups from 18 to 59. Competency-based interviews are conducted to remove any subjectivity in the selection process, ensuring that people are recruited for the skills they offer, and are thus given an equal opportunity. We comply with any local requirement stipulated by the national labour departments in relation to employment equity in the countries in which we operate</li> <li><a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> </ul>	
G4-LA12	Composition of governance bodies and breakdown of employees per employee category according to gender, age, and other indicators of diversity	<ul style="list-style-type: none"> <li>IR: Governance – diversity</li> </ul>	58 – 59
<b>CATEGORY: Social – labour practices and decent work</b> <b>ASPECT: Equal remuneration for men and women</b>			
	Describe the approach to management of equal remuneration for women and men, and how this is reported on	<ul style="list-style-type: none"> <li>MTN appoints employees based on a fair process that is based on human resource policies and procedures. Remuneration decisions are subject to these policies and procedures which are applicable to males and females. Remuneration is determined by position, skills, expenses, qualifications and affordability</li> <li>No reports on equal remuneration for men and women are available</li> </ul>	
G4-LA13	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operations	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
<b>CATEGORY: Social – labour practices and decent work</b> <b>ASPECT: Supplier assessment for labour practices</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>In 2017, the new MTN supplier code of conduct was finalised and distributed. The code identifies the human rights of suppliers' employees and requires them to treat staff with dignity and respect, including with respect to freely chosen employment, the rights of young workers and issues of child labour, non-discrimination and fair treatment, respect and dignity, wages, working hours and benefits. New suppliers are now required to acknowledge the supplier code of conduct on MTN's procurement system, before a working relationship (awarding a contract) can commence. Existing suppliers will be reviewed against the annual supplier 'health check' form, which will trigger the requirement for them to accept the supplier code of conduct</li> </ul>	



# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Social – labour practices and decent work</b>			
<b>ASPECT: Labour practices grievance mechanisms</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>The group has a defined code of conduct related to human resource management and practices. Entrenched in this is a detailed grievance procedure that ensures that employees enjoy the freedom to raise grievances, and ensures that these will be correctly mediated</li> </ul>	
G4-LA16	Number of grievances about labour practices filed, addressed, resolved, through formal grievance mechanisms	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
<b>CATEGORY: Social – human rights</b>			
<b>ASPECT: Investment</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>SR: Sustainable societies – digital human rights</li> <li>Digital Human Rights: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> <li><a href="https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx">https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx</a></li> </ul>	41 – 46
G4-HR1	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that have undergone human rights screening	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
G4-HR2	Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
<b>CATEGORY: Social – human rights</b>			
<b>ASPECT: Non-discrimination</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>Entrenched in the group's code of conduct are noted transgressions that carry serious penalties for any person who offends another based on colour, race, creed, political association or injury to person or their dignity. This ensures that all employees are able to operate freely within the organisation, and focus on their primary roles (which is to provide the services contractually agreed to)</li> <li><a href="https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx">https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx</a></li> </ul>	
G4-HR3	Number of incidents of discrimination and action taken	<ul style="list-style-type: none"> <li>Not available</li> </ul>	

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Social – human rights</b>			
<b>ASPECT: Freedom of association and collective bargaining</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>Employees are free to associate socially, politically, religiously or otherwise, as well as join any bargaining council without fear of victimisation. Our code of conduct enables us to correctly manage situations where an employee may infringe on these rights</li> <li><a href="https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx">https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx</a></li> </ul>	
G4-HR4	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at risk, and details of the measures taken to support these rights	<ul style="list-style-type: none"> <li>Employees are free to associate socially, politically, religiously or otherwise, as well as join any bargaining council without fear of victimisation. Our code of conduct enables us to correctly manage situations where an employee may infringe on these rights</li> <li>Suppliers: Not available</li> </ul>	
<b>CATEGORY: Social – human rights</b>			
<b>ASPECT: Human rights grievance mechanisms</b>			
	Disclosure of management approach	<ul style="list-style-type: none"> <li>Stakeholders engagement with MTN on human rights matters and concerns either on a national level, with MTN country operations, and/or with the group itself, at their prerogative. For national incidents, communicating with customers, local communities and media, and engaging authorities and other industry roleplayers are undertaken by the country management team. At a group level, engagement is undertaken on both a proactive (general information sharing) and reactive (incident-specific) basis, where possible. Stakeholders may also contact each country operation using the general complaint and grievance structure or contact details available on each country operation's website</li> </ul>	
G4-HR12	Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
<b>CATEGORY: Society</b>			
<b>ASPECT: Local communities</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li><a href="https://www.mtn.com/en/mtn-group/social-investments/Pages/default.aspx">https://www.mtn.com/en/mtn-group/social-investments/Pages/default.aspx</a></li> </ul>	
G4-SO1	Operations with significant actual and potential negative impacts on local communities	<ul style="list-style-type: none"> <li>Digital human rights: SR: Sustainable societies – digital human rights</li> <li>Mobiles and health: all operations engage directly, and through local regulatory authorities, with communities with respect to matters related to network installation</li> <li>CSI: all MTN operations engage directly with local communities either through formal MTN Foundations, which are responsible for disbursing financial social investment initiatives in the areas of education, health, economic empowerment and national priorities, and/or through 21 Days of <b>Yello</b> Care, the group's annual staff volunteer programme in support of community upliftment</li> </ul>	41 – 46

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Society</b> <b>ASPECT: Anti-corruption</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>IR: Governance</li> <li>Group positions on anti-corruption and conflicts of interest at <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> </ul>	62 and 66
G4-S03	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified	<ul style="list-style-type: none"> <li>All MTN operations participate in the MTN group-wide ethics risk assessment, which is conducted independently every three years by The Ethics Institute. The next ERA will be conducted in 2019. Annually, a group-wide culture audit is conducted that includes a corporate integrity as well as a values dimension. The results of these two indexes provide insight into the efficacy of ethics risk management efforts. To ensure that high ethics risks are tracked as part of the key risks according to the MTN Group enterprise risk management (ERM) methodology, ethics risk was included in the MTN corporate risk register as from 2017. Mitigation of key ethics risks was reported to the group board's Social and Ethics Committee in every quarter. The impact of ethics risk management interventions is monitored through the analysis of trends in the corporate integrity as well as the values index within MTN's annual group-wide culture audit. Findings indicated a year-on-year improvement in employee perception of corporate integrity and values. This positive year-on-year trend in these two dimensions has been sustained since 2014. The improvement is deemed statistically significant by Willis Towers Watson, who independently conducts the MTN GCA</li> </ul>	
G4-S04	Communication and training on anti-corruption policies and procedures	<ul style="list-style-type: none"> <li>Some of our activities in this respect include an annual Fraud and Ethics Awareness Week, requiring all management and employees to undertake ethics pledges, and digital training and management videos. Our various operations ensure management and business risk management on issues of fraud, corruption and ethics</li> <li>Various opco training initiatives led by management and BRM on fraud, corruption and ethics</li> </ul>	
G4-S05	Confirmed incidents of corruption and actions taken	<ul style="list-style-type: none"> <li>Due disciplinary processes are followed to investigate and resolve matters of ill-discipline including corruption. Sanctions may range from warnings to termination of employment</li> </ul>	

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Society</b> <b>ASPECT: Public policy</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>For us at MTN, the approach to public policy engagement must be agile and fluid. Given the rapid pace at which the industry is changing, it is important that we are ahead of the curve when it comes to changes in the public policy universe. We do this in many ways: <ul style="list-style-type: none"> <li>Via various board committees and working groups in the GSMA: MTN Group is represented both at the GSMA board level and at the chief policy and regulatory officers group (CPROG) by the group president and CEO and the chief regulatory and corporate affairs officer respectively. Each of these bodies provide strategic insights and critical input opportunities for various studies, global research projects and standardisation efforts across the industry</li> <li>In the last year, a function dedicated to public policy and regulatory governance was created within the group regulatory and corporate affairs division. Within this function is the role for research and policy management which is mainly responsible for proactively identifying important policy developments, changes and trends that may affect the business across our various markets</li> <li>We continue to take a rigorous approach to engaging with regulatory and legislative bodies who invite us to provide commentary and engage in public consultations. We also ensure that each of our MTN operations are able to engage directly with their authorities at critical points in the policy cycle to ensure sufficient opportunity for crafting public policy with the relevant stakeholders in a way that can create shared value</li> <li>Finally, the rise of digital services requires a more nuanced approach to public policy and subsequent regulation that emerges from this. For this reason, we are engaging with multiple industry associations, international and regional bodies as well as other stakeholders on policy directions that are mutually beneficial to customers and service providers of digital solutions</li> </ul> </li> <li>Social and ethics statement <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> </ul>	
<b>CATEGORY: Society</b> <b>ASPECT: Anti-competitive behaviour</b>			
G4-S06	Total value of political contributions by country and recipient/beneficiary	<ul style="list-style-type: none"> <li>No political contributions were made</li> </ul>	
	Disclosure on management approach	<ul style="list-style-type: none"> <li>As a company incorporated in South Africa, the group is regulated by the Competition Commission of South Africa and the rules and regulations applicable to all companies listed on the JSE</li> </ul>	
G4-S07	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes	<ul style="list-style-type: none"> <li>We have historically reported on the status and results of the lawsuit by Turkcell against MTN Group Limited and other companies in the group. Please refer to <a href="https://www.mtn.com/en/mtn-group/press-and-insights/press-releases/Pages/default.aspx">https://www.mtn.com/en/mtn-group/press-and-insights/press-releases/Pages/default.aspx</a> for updated information</li> </ul>	

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Society</b> <b>ASPECT: Compliance</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>• <a href="https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx">https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx</a></li> </ul> <p>We do business in full compliance with the laws of each country we operate in, including:</p> <ul style="list-style-type: none"> <li>• International trade laws and regulations, embargoes and sanctions</li> <li>• Competition laws</li> <li>• Fraud, anti-bribery and corruption laws</li> <li>• Anti-money laundering laws</li> <li>• Intellectual property laws</li> <li>• Human rights and equal opportunity obligations</li> </ul>	
G4-S08	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	<ul style="list-style-type: none"> <li>• Not available</li> </ul>	
<b>CATEGORY: Society</b> <b>ASPECT: Grievance mechanisms for impacts on society</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>• One of the group's key mechanisms of encouraging reports of unacceptable behaviours (or allegations of unacceptable behaviour) for investigation is the anonymous whistle-blower line for use by both employees and the public. The line is supported by telephonic and e-mail communication channels, and is managed by Deloitte</li> </ul>	
<b>CATEGORY: Product responsibility</b> <b>ASPECT: Customer health and safety</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>• Group positions on mobiles and health: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> <li>• MTN operations maintain terms, conditions on service and legal content on the local website for the operations. These terms and conditions may also include any additional information useful to subscribers, such as activation agreements, transfer procedures, defective goods and technical fault reporting, personal information management, and more. Some aspects of customer terms and conditions are often also separately detailed for different types of value-add and internet services, phones and devices, etc. Terms and conditions of service for physical products such as mobile handsets and tablets may also be included in the product pack. In some countries, all MTN stores display MTN's commitments to consumer rights and complaints mechanisms including contact details of regulatory authorities. Product and service labelling may also be subject to additional communication, disclosure or other requirements as set out by national consumer protection regulations in each of the countries where we operate. Customer complaint and feedback services are available through walk-in service and other centres, and via voice, e-mail, social media and other digital channels</li> </ul>	

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Product responsibility</b> <b>ASPECT: Customer health and safety</b> continued			
G4-PR1	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	<ul style="list-style-type: none"> <li>Group positions on mobiles and health: <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> <li>Regarding the position paper above, all handsets must be certified for safety before national regulators will allow distribution. The number of network sites assessed for health and safety impacts with respect to safe levels of electromagnetic fields varies for each country of operation, and is subject to requirements set out by the national telecommunications regulator</li> </ul>	
G4-PR2	Number of incidents of regulatory non-compliance concerning health and safety impacts of products and services during their lifecycle, by type of outcome	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
<b>CATEGORY: Product responsibility</b> <b>ASPECT: Product and service labelling</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>MTN operations maintain terms, conditions on service and legal content on the local website for the operations. These terms and conditions may also include any additional information useful to subscribers, such as activation agreements, transfer procedures, defective goods and technical fault reporting, and more, and are often also separately detailed for different types of value-add and internet services, phones and devices, etc. Terms and conditions of service for physical products such as mobile handsets and tablets may also be included in the product pack. Product and service labelling may also be subject to additional communication, disclosure or other requirements as set out by national consumer protection regulations in each of the countries where we operate. Customer complaint and feedback services are available through walk-in service and other centres, and via voice, e-mail, social media and other digital channels</li> </ul>	
G4-PR3	Type of product and service information required by the organisation's procedures for product and service information and labelling, and percentage of significant product and service categories subject to such information requirements	<ul style="list-style-type: none"> <li>The types of products and services offered by each of our operations may vary from country to country, and this information is therefore not available in a consolidated format at the group reporting levels. Some of our operations may maintain this information on their local websites. Please refer to the references as indicated in G4-HR4</li> </ul>	
G4-PR5	Results of surveys measuring customer satisfaction	<ul style="list-style-type: none"> <li>IR: How we sustain value using the six capitals</li> </ul>	14

# UN Global Reporting Initiative (GRI) 4 report continued

Index	Description	Information (document or web link)	Page(s)
<b>CATEGORY: Product responsibility</b> <b>ASPECT: Marketing communications</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>In addition to complying with local laws, standards and codes of practice in each country where we operate, as a regulated organisation subject to oversight by national telecommunication regulatory authorities, we may be required to abide by specific additional requirements regarding marketing communications. For instance, in order for us to market voice or data products in order to grow our subscriber base, our quality of service may be subject to review by regulators before permission may be granted (in circumstances where quality of service may fall below pre-set standards or as agreed in regulatory licences)</li> </ul>	
G4-PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotions, and sponsorship, by type of outcomes	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
<b>CATEGORY: Product responsibility</b> <b>ASPECT: Customer privacy</b>			
	Describe the approach to management and reporting of customer privacy	<ul style="list-style-type: none"> <li>SR: Sustainable societies – digital human rights</li> <li>Group positions on digital human rights <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> </ul>	41 – 66
G4-PR8	Number of substantiated complaints regarding breaches of customer privacy and losses of customer data	<ul style="list-style-type: none"> <li>Not available</li> </ul>	
<b>CATEGORY: Product responsibility</b> <b>ASPECT: Compliance</b>			
	Disclosure on management approach	<ul style="list-style-type: none"> <li>Group social and ethics statement <a href="https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx">https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx</a></li> </ul>	
G4-PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	<ul style="list-style-type: none"> <li>Not available</li> </ul>	