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ANNUAL SUSTAINABILITY STATEMENTS



ANNUAL SUSTAINABILITY STATEMENTS *continued*

UN Global Reporting Initiative (GRI) 4 report for 2015

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 must be referenced in order to comprehensively assess our response:

- MTN Group integrated report 2015 (IR) 
- MTN Group sustainability report 2015 (SR) 
- MTN Group Carbon Disclosure Project report 2015 (CDP) 
- MTN Group Global Compact Communication of Progress report 2015 (UNGC) 
- www.mtn.com 

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STRATEGY AND ANALYSIS

G4-1	CEO statement	■ IR: A word from our executive chairman ■ SR: MTN's Group executive chairman's message	■ 4 ■ 3
G4-2	Impacts, risks and opportunities on stakeholders and financial performance	■ IR: Our top risks and what we are doing about them	■ 24

ORGANISATIONAL PROFILE

G4-3	Name of reporting organisation	■ MTN Group Limited	
G4-4	Primary brands, products and services	■ www.mtn.com ■ www.mtnbusiness.com	
G4-5	Location of headquarters operating structure	■ 216 – 14th Avenue, Fairland, 2195, South Africa	
G4-6	Geographic scope/map of operations	■ www.mtn.com (our growing footprint)	
G4-7	Nature of ownership and legal form	■ IR: Where we operate	■ 2
G4-8	Markets served, sectors served and profile of customers/beneficiaries, profile of customer base	■ IR: Where we operate ■ IR: Consumer services ■ IR: Enterprise Business Services	■ 2 ■ 27 ■ 97
G4-9	Scale of the reporting organisation including number of employees and operations	■ IR: About this report ■ SR: Sustainability value added statement ■ SR: About this report	■ Pre-page 1 ■ 24 ■ 46
G4-10	Number of employees by employment contract and gender	■ SR: Sustainability value added statement	■ 46
G4-11	Percentage of employees covered by collective bargaining agreements	■ SR: The workplace ■ SR: Sustainability value added statement	■ 22 ■ 46

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G4-12	Describe the organisation's supply chain (types, number of and locations of suppliers including any sector-specific characteristics of the supply chain)	MTN has established a comprehensive policy and maintains a procedures manual that describes how suppliers are validated prior to and after engaging with MTN both at a Group and operating country level. A comprehensive pre-qualification process is followed for supplier registration while a comprehensive evaluation framework ensures that the right suppliers are selected. MTN utilises a sourcing tool that enables transparency and objectivity within the sourcing process. All suppliers within our supply chain are required to accept the same standards that we use to hold our employees accountable, including our Code of Conduct, Anti-Bribery and Corruption policy and declarations regarding conflicts of interest	
G4-13	Changes occurring within the reporting period regarding size, structure or ownership	- We have reviewed our operating structure in order to strengthen the operational oversight, governance, strategy, regulatory compliance and leadership across our 22 country operations in Africa and the Middle East. MTN has been restructured into three regions: West and Central Africa (WECA), South and East Africa (SEA), and Middle East and North Africa (MENA), with vice presidents reporting to the executive chairman appointed for each region. The Group president and CEO resigned in November 2015, and the Group chairman is currently fulfilling the executive role until the CEO post is fulfilled - IR: Key changes to our operations	10

COMMITMENTS TO EXTERNAL INITIATIVES

G4-14	How the precautionary approach/principle is addressed	- SR: Eco-responsibility – environmental management www.mtn/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	16
G4-15	External economic, environmental and social charters or principles subscribed to/endorsed	SR: About MTN sustainability	45
G4-16	Memberships of associations and national or international advocacy organisations	- National Business Initiative - Groupe Speciale Mobile Association (GSMA)	

IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES

G4-17	Organisational structure	IR: Where we operate	2
G4-18	How report content and aspect boundaries are defined and how the organisation has implemented reporting principles	- SR: Our approach to sustainability - IR: About this report	45 Pre-page 1
G4-19	List all material aspects identified in the process for defining report content	- SR: About this report - IR: Our material issues	46 11
G4-20	For each material aspect, report the aspect boundary within the organisation	SR: Our approach to sustainability	45
G4-21	For each material aspect, report the aspect boundary outside of the organisation	SR: Our approach to sustainability	45
G4-22	Effect of any restatements of information in previous reports and associated reasons	IR: Summary consolidated financial statements	111
G4-23	Significant changes to report content/scope (material aspects) from previous reports	- IR: Key changes to our operating structure - SR: Eco-responsibility – energy and climate (changing context) - SR: Sustainability value added statement (notes for energy and GHG savings)	10 14 26

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G4-24	List of stakeholder groups engaged by the organisation	■ www.mtn.com/MTNGROUP/About/Pages/Stakeholders.aspx ■ SR: Our approach to sustainability	■ 45
G4-25	How are stakeholders identified?	■ www.mtn.com/MTNGROUP/About/Pages/Stakeholders.aspx ■ SR: Our approach to sustainability	■ 45
G4-26	Approaches to stakeholder engagement (who, how, and what outcomes)	■ www.mtn.com/MTNGROUP/About/Pages/Stakeholders.aspx ■ SR: Our approach to sustainability	■ 45
G4-27	Stakeholder concerns and how the organisation has responded. Report the stakeholder groups that raised each concern	■ www.mtn.com/MTNGROUP/About/Pages/Stakeholders.aspx ■ SR: Our approach to sustainability	■ 45
REPORT PROFILE			
G4-28	Reporting period	■ 1 January 2015 to 31 December 2015	
G4-29	Date of most recent report	■ 31 December 2014	
G4-30	Reporting cycle	■ Annual	
G4-31	Contact point	■ IR: About this report ■ SR: Our approach to sustainability	■ Pre-page 1 ■ 47
G4-32	"In accordance" option chosen, GRI content index chosen, external assurance report	■ In accordance – core ■ GRI context index – G4 ■ IR: Independent assurance report ■ SR: Sustainability value added statement	■ 117 ■ 24
G4-33	Policy and current practice on independent assurance, and whether the highest governance body is involved in seeking assurance for the sustainability report	■ IR: Independent assurance report ■ SR: About MTN sustainability	■ 117 ■ 45
GOVERNANCE			
G4-34	Governance structure including highest governance committees, and committees responsible for decision making on economic, environment, and social impacts	■ IR: How we are governed ■ SR: About MTN sustainability	■ 51 ■ 45
G4-35	Process for delegating authority for sustainability topics from the highest governance body to senior executives and other employees	■ SR: About MTN sustainability	■ 45
G4-36	Executive level position/s with responsibility for sustainability topics including reporting lines to highest governance body	■ SR: About MTN sustainability	■ 45
G4-37	Process for consultation between stakeholders and the highest governance body on sustainability topics	■ SR: About MTN sustainability	■ 45
G4-38	Composition of the highest governance body (board) and its committees – detailed	■ IR: How we are governed – board committees	■ 51

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G4-39	Is chairman of highest governance body also an executive officer?	■ IR: How we are governed	■ 48
G4-40	Nomination and selection process for highest governance body and committees, including criteria such as diversity, independence, and expertise for nominations and selections	■ IR: How we are governed	■ 49
G4-41	Process followed by the board for managing conflicts of interest	■ IR: How we are governed ■ IR: Social and ethics committee report	■ 49 ■ 62
G4-42	Highest governance body's role in development, and approval of organisation's value statements, policies and strategies related to sustainability	■ SR: About MTN sustainability	■ 45
G4-43	Measures taken to develop and enhance board's knowledge of sustainability	■ SR: About MTN sustainability	■ 45
G4-44	Processes for evaluating board's sustainability performance and actions taken in response to evaluations	■ SR: About MTN sustainability	■ 45
G4-45	Board's oversight of sustainability	■ IR: How we are governed ■ SR: About MTN sustainability	■ 49 ■ 45
G4-46	Board's role in reviewing effectiveness of risk management processes	■ IR: Summarised corporate governance report	■ 54
G4-47	Report the frequency of the board's review of economic, environmental and social impacts, risks and opportunities	■ IR: How we are governed – social and ethics report ■ Reports are presented to the Group's social and ethics committee on a quarterly reporting cycle basis	■ 62
G4-48	Highest committee or position that approves sustainability report and ensures all material aspects are covered	■ SR: About MTN sustainability	■ 45
G4-49	Process for communicating critical concerns to the board	■ IR: How we are governed	■ 51
G4-50	Nature and number of critical concerns communicated to board, and mechanisms used to resolve	■ Not available	
G4-51	Report remuneration policies for highest governance body and senior executives, and describe the link between remuneration and leadership performance	■ IR: Remuneration committee chairman's report	■ 66
G4-52	Process for determining remuneration	■ IR: Remuneration committee chairman's report	■ 66
G4-53	How are stakeholders' views taken into account regarding remuneration	■ In addition to internal remuneration policies, stakeholder views are taken into account to ensure both internal equity and external competitiveness. The decision on remuneration is based on MTN's internal policies which are approved by various actors to ensure objectivity and eliminate subjectivity	
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	■ Not available	
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	■ Not available	

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ETHICS AND INTEGRITY			
G4-56	Organisation's values, principles, standards, norms of behaviour and codes of conduct/ethics	■ https://www.mtn.com/MTNGROUP/About/Pages/GovernanceManagementofEthics.aspx ■ www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx – Group social and ethics statement – Anti-corruption – Conflicts of Interest – Human rights and ICT – Networks and environment	
G4-57	Internal and external mechanisms for seeking advice on ethical and lawful behaviour	■ IR: Social and ethics committee report ■ https://www.mtn.com/MTNGROUP/About/Pages/GovernanceManagementofEthics.aspx	■ 62
G4-58	Internal and external mechanisms for reporting concerns about unethical or unlawful behaviour, escalations, and whistle-blowing	■ IR: Social and ethics committee report ■ IR: Risk management ■ https://www.mtn.com/MTNGROUP/About/Pages/GovernanceManagementofEthics.aspx	■ 62 ■ 61
CATEGORY: Economic			
ASPECT: Economic performance			
	Disclosure on management approach	■ www.mtn.com/Investors/FinancialReporting/Pages/IntegratedReports.aspx ■ www.mtn.com/Investors/FinancialReporting/Pages/AnnualResults.aspx ■ www.mtn.com/Investors/FinancialReporting/Pages/InterimResults.aspx ■ www.mtn.com/Investors/FinancialReporting/Pages/QuarterlyResults.aspx ■ www.mtn.com/Investors/MoreinInvestors/Pages/Presentations.aspx	
G4-EC1	Direct economic value generated and distributed (revenues, operating costs, wages, benefits, loans)	■ IR: Summarised consolidated financial statements ■ www.mtn.com/investors/financialreporting	■ 100
G4-EC2	Climate change-related financial implications and risks and opportunities	■ IR: MTN's value creation ■ SR: Eco-responsibility – energy and climate (risks, mitigation and opportunities) ■ https://www.mtn.com/Sustainability/Documents/MTN_Group_2014_CDP_Report.pdf ■ https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	■ 19
G4-EC3	Defined benefit plan obligations coverage	■ Not available	
G4-EC4	Financial assistance from government	■ 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)	

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CATEGORY: Economic			
ASPECT: Market presence			
	Disclosure on management approach	■ IR: Where we operate	■ 2
G4-EC5	Ratios of standard entry level wage compared to local minimum wage (by gender)	■ Not available	
G4-EC6	Proportions of senior management hired from local communities	■ We currently report on the percentage of expatriate employees, but do not indicate this by management level. See SR: sustainability value added statement	■ 24
CATEGORY: Economic			
ASPECT: Indirect economic impacts			
	Disclosure on management approach	■ IR: MTN's value creation ■ SR: Sustainability value added statement ■ https://www.mtn.com/SocialResponsibility/Pages/default.aspx	■ 18 ■ 24
G4-EC7	Extent and impact of development of significant infrastructure investments and services and whether they are commercial, in kind, or pro bono engagements	■ https://www.mtn.com/Investors/Pages/Overview.aspx ■ https://www.mtn.com/SocialResponsibility/Pages/default.aspx	
G4-EC8	Significant indirect economic impacts, including extent of impacts	■ IR: MTN's value creation ■ SR: Sustainability value added statement ■ https://www.mtn.com/SocialResponsibility/Pages/default.aspx	■ 18 ■ 24
CATEGORY: Economic			
ASPECT: Procurement practices			
	Disclosure on management approach	■ 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	
G4-EC9	Policies, practices, and proportion of spending on locally based suppliers	■ SR: Sustainability value add statement (black economic empowerment)	■ 25
CATEGORY: Environmental			
ASPECT: Materials			
	Disclosure on management approach	■ SR: Eco-responsibility – environmental management ■ www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	■ 12
G4-EN2	Materials used: weight/volume	■ SR: Eco-responsibility – environmental management ■ SR: Sustainability value added statement	■ 12 ■ 25

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ASPECT: Energy			
	Disclosure on management approach	■ SR: Eco-responsibility – energy and climate ■ SR: Sustainability value added statement ■ https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn ■ www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	■ 13 ■ 25
G4-EN3	Energy consumption within the organisation	■ SR: Eco-responsibility – energy and climate ■ https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	■ 13
G4-EN4	Energy consumption outside of the organisation	■ SR: Eco-responsibility – energy and climate ■ https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	■ 13
G4-EN5	Energy intensity ratio	■ SR: Eco-responsibility – energy and climate ■ https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	■ 13
G4-EN6	Reduction of energy consumption (as a result of conservation and efficiency initiatives)	■ SR: Eco-responsibility – energy and climate ■ https://www.mtn.com/Sustainability/Ecoresponsibility/Pages/energymanagement.aspx ■ https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	■ 13
CATEGORY: Environmental			
ASPECT: Water			
	Disclosure on management approach	■ 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 and LEED certifications for MTN South Africa, responsible water management and use is addressed. In 2015, MTN Cyprus also attained ISO 14001 certification. 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 reviewing 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. See SR: Eco-responsibility – environmental management ■ www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	

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CATEGORY: Environmental
ASPECT: Biodiversity

	Disclosure on management approach	- SR: Eco-responsibility – environmental management www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	16
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CATEGORY: Environmental
ASPECT: Emissions

	Disclosure on management approach	- SR: Eco-responsibility – energy and climate www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	13
G4-EN15	Direct GHG emissions (Scope 1)	- SR: Eco-responsibility – energy and climate - SR: Sustainability value added statement https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	13 25
G4-EN16	Energy indirect GHG emissions (Scope 2)	- SR: Eco-responsibility – energy and climate - SR: Sustainability value added statement https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	13 25
G4-EN17	Other indirect GHG emissions (Scope 3)	- SR: Eco-responsibility – energy and climate - SR: Sustainability value added statement https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	13 25
G4-EN18	GHG emissions intensity	- SR: Eco-responsibility – energy and climate - SR: Sustainability value added statement https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	13 25
G4-EN19	Reduction of GHG emissions	- SR: Eco-responsibility – energy and climate - SR: Sustainability value added statement https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	13 25
G4-EN20	Emissions of ozone depleting substances (ODS)	https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	

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CATEGORY: Environmental ASPECT: Effluents and waste			
	Disclosure on management approach	■ 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 and LEED certifications for MTN South Africa, responsible water management and use is addressed. In 2015, MTN Cyprus also attained ISO 14001 certification. 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 reviewing 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. See SR: Eco-responsibility – environmental management. The Group has also addressed downstream recycling of its e-waste and that of its customers and the general public in South Africa, Benin and Côte d'Ivoire ■ www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	
G4-EN23	Total weight of waste by type and disposal method	■ SR: Eco-responsibility – environmental management ■ SR: Sustainability value added statement	■ 17 ■ 25
G4-EN24	Total number and volume of significant spills	■ Not available	
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	■ The most material waste subject to this convention is electronic and electrical waste (e-waste). 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. A short-term public awareness and e-waste collection campaign will be undertaken in 2015 by MTN Benin and Ericsson. Manufacturer-agnostic e-waste collected in Benin and Côte d'Ivoire in partnership with Ericsson is shipped from Benin and Côte d'Ivoire to South Africa, and is therefore subject to the Convention. For tonnage, see references below. ■ SR: Eco-responsibility – environmental management ■ SR: Sustainability value added statement	■ 18 ■ 25
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	■ Although not a material aspect for the Group, see SR: Eco-responsibility – environmental management ■ www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	■ 17

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CATEGORY: Environmental

ASPECT: Products and services

	Disclosure on management approach	■ The Global e-Sustainability Initiative has assessed that ICT-enabled solutions can help the world achieve carbon abatements in the region of 9,6GtCO₂e or 16,5% of global outputs by 2020. Although our solutions in this domain are relatively small, opportunities are growing rapidly, and include cloud computing for virtualisation and other efficiencies, and machine-to-machine products to address risks of water leakage, report on air quality composition for improvement efforts, and encouragement of energy-efficient driving by fleet drivers using our fleet management solution ■ SR: Sustainable economies – transforming enterprises ■ https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudy	■ 9
G4-EN28	Percentage of products sold and their packaging materials that are reclaimed by category	■ SR: Sustainability value add statement	■ 25

CATEGORY: Environmental

ASPECT: Compliance

	Describe the approach to managing and reporting on compliance (with environmental laws and regulations)	■ The Group's legal and regulatory functions are responsible for oversight and reports on non-compliances and fines issued	
G4-EN29	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	■ Not available	

CATEGORY: Environmental

ASPECT: Transport

	Disclosure on management approach	■ Although transportation is not a source of significant environmental impact and is not deemed material, greenhouse gas emissions associated with air transport and vehicle hire are quantified ■ SR: Eco-responsibility – energy and climate ■ SR: Sustainability value add statement ■ https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=mtn	■ 13 ■ 25
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CATEGORY: Environmental

ASPECT: Overall

	Disclosure on management approach	■ SR: Eco-responsibility – environmental management ■ https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf ■ https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	■ 12
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CATEGORY: Social – labour practices and decent work

ASPECT: Employment

	Disclosure on management approach	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 on various aspects are submitted to the Group chief human resources and corporate affairs officer. Annual performance is presented in the Group's UN Global Compact Communication of Progress (UN GC COP) report	
G4-LA1	Number and rates of employee hires and turnover, by age group, gender, and region	SR: Sustainability value added statement	24
G4-LA2	Benefits provided to full-time employees that are not provided to temporary/part-time employees, by significant locations of operations	Not available	
G4-LA3	Return to work and retention rates after parental leave, by gender	Not available	

CATEGORY: Social – labour practices and decent work

ASPECT: Labour/management relations

	Describe the approach to management of labour relations and how this is reported on	Retrenchments are a result of organisational restructuring. All organisational restructures follow a strict consultation with affected staff. During this process, employees have the opportunity to interrogate the changes and offer suggestions for management to apply their minds to. 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	
G4-LA4	Report minimum notice periods regarding significant operational changes as well as whether these are specified in collective agreements	Employees are notified as soon as a possible restructuring process within the organisation is considered. This follows a consultation process. 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	

CATEGORY: Social – labour practices and decent work

ASPECT: Occupational health and safety

	Describe the approach to managing and reporting on occupational health and safety within the organisation	SR: Sustainable societies – the workplace	22
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	SR: Sustainable societies – the workplace	22
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	- SR: Sustainable societies – the workplace - SR: Sustainability value added statement - Occupational diseases are not a feature of our business, given the nature of our business, and the types of products and services offered - Data on lost days is not available, but is deemed not material due to the low rate of workplace-related accidents/injuries	22 24

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CATEGORY: Social – labour practices and decent work
ASPECT: Training and education

	Disclosure on management approach	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 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	
G4-LA9	Average hours of training per employee per year (by gender and employee category)	SR: Sustainability value added statement	24
G4-LA10	Report on the type and scope of programmes implemented for employee skills management and lifelong learning	As part of our training and development initiative we offer courses to our employees in the subjects of business acumen, commercial, leadership and behavioural, organisational development and technology. Based on 2015 results, 84% of the courses done were related to the technology category, followed by business acumen at 4,7%	
G4-LA11	Percentage of employees receiving regular performance and career development reviews, by gender and employee category	SR: Sustainability value added statement	24

CATEGORY: Social – labour practices and decent work
ASPECT: Diversity and equal opportunity

	Describe the approach to managing and reporting on diversity and equal opportunity	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 also 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 Department of Labour in relation to employment equity in the countries in which we operate	
G4-LA12	Composition of governance bodies and breakdown of employees per employee category according to gender, age, and other indicators of diversity	- IR: Who is responsible - SR: Sustainability value added statement	44 24

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CATEGORY: Social – labour practices and decent work

ASPECT: Equal remuneration for men and women

	Describe the approach to management of equal remuneration for women and men, and how this is reported on	MTN appoints staff based on fair procedures, guidelines and practices which are detailed in human resource policies. The remuneration determination for both women and men is subjected to the same procedures and processes which are affordability, skills, qualifications, experience and attitude	
G4-LA13	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operations	Not available	

CATEGORY: Social – labour practices and decent work

ASPECT: Supplier assessment for labour practices

	Disclosure on management approach	Not available	
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CATEGORY: Social – labour practices and decent work

ASPECT: Labour practices grievance mechanisms

	Disclosure on management approach	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	
G4-LA16	Number of grievances about labour practices filed, addressed, resolved, through formal grievance mechanisms	Not available	

CATEGORY: Social – human rights

ASPECT: Investment

	Disclosure on management approach	- SR: Sustainable societies – digital human rights https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	20
G4-HR1	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that have underwent human rights screening	Not available	
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	Not available	

CATEGORY: Social – human rights

ASPECT: Non-discrimination

	Disclosure on management approach	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)	
G4-HR3	Number of incidents of discrimination and action taken	Not available	

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CATEGORY: Social – human rights

ASPECT: Freedom of association and collective bargaining

	Disclosure on management approach	■ 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 ■ SR: The workplace	■ 22
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	■ 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 ■ SR: Sustainable societies – the workplace ■ Suppliers: Not available	■ 22

CATEGORY: Social – human rights

ASPECT: Human rights grievance mechanisms

	Disclosure of management approach	■ SR: Sustainable societies – digital human rights	■ 20
	Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms	■ Not available	

CATEGORY: Society

ASPECT: Local communities

	Disclosure on management approach	■ SR: Sustainable societies – digital human rights ■ https://www.mtn.com/Sustainability/Documents/Mobile_and_Health_2013.pdf ■ https://www.mtn.com/SocialResponsibility/Pages/default.aspx	■ 20
G4-SO1	Operations with significant actual and potential negative impacts on local communities	■ https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx ■ Mobiles and health: all operations engage directly, and through local regulatory authorities, with communities with respect to matters related to network installation ■ 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 Y'ello Care, the Group's annual staff volunteer programme in support of community upliftment	

CATEGORY: Society

ASPECT: Anti-corruption

	Disclosure on management approach	■ IR: How we are governed – risk management ■ IR: How we are governed – social and ethics statement ■ www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx ■ www.mtn.com/MTNGROUP/About/Pages/EthicsGovernanceManagement.aspx	■ 61 ■ 62
G4-SO3	Total number and percentage and of operations assessed for risks related to corruption and the significant risks identified	■ While the number and percentage of operations assessed is not available, please review the Group's risk management and social and ethics committee reports in the Integrated Report	■ 57
G4-SO4	Communication and training on anti-corruption policies and procedures	■ IR: Social and ethics committee report ■ https://www.mtn.com/MTNGROUP/About/Pages/GovernanceManagementofEthics.aspx ■ SR: Sustainable societies – introduction and performance against objectives	■ 63 ■ 19
G4-SO5	Confirmed incidents of corruption and actions taken	■ Not disclosed	

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CATEGORY: Society			
ASPECT: Public policy			
	Disclosure on management approach	■ https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx ■ Public policy engagement is undertaken through the following means: – Via matters under consideration by the GSMA board – Via the necessary regulatory agency either in formal public commentary invitation processes, or as required for possible emerging regulation or industry-specific matters such as carbon taxes, spectrum allocation, etc. (MTN operations may engage directly with the necessary regulatory agency, or collectively via national business or industry associations) – With other national or international bodies or authorities such as the African Union, the National Business Initiative and industry associations	
G4-SO6	Total value of political contributions by country and recipient/beneficiary	■ No contributions made by the management company in 2015	
CATEGORY: Society			
ASPECT: Anti-competitive behaviour			
	Disclosure on management approach	■ 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	
G4-SO7	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes	■ https://www.mtn.com/PressOffice/MTNIran/Pages/MTNIran.aspx	
CATEGORY: Society			
ASPECT: Compliance			
	Disclosure on management approach	■ IR: Social and ethics committee report ■ https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	■ 62
G4-SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	■ IR: A word from our executive chairman ■ https://www.mtn.com/Media/MTNNigeria/Pages/MTNNigeria.aspx ■ https://www.mtn.com/Media/Pages/pressreleasedetail.aspx?pid=316&country=South	■ 4

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CATEGORY: Society

ASPECT: Grievance mechanisms for impacts on society

	Disclosure on management approach	- 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 email communication channels, and is managed by Deloitte https://www.mtn.com/MTNGROUP/About/Pages/GovernanceManagementofEthics.aspx	
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CATEGORY: Product responsibility

ASPECT: Customer health and safety

	Disclosure on management approach	www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	
G4-PR1	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	
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	Not available	

CATEGORY: Product responsibility

ASPECT: Product and service labelling

	Disclosure on management approach	MTN operations maintain terms and conditions on service and legal content on the local websites in each of the countries in which we operate. 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, email, social media and other digital channels	
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CATEGORY: Product responsibility

ASPECT: Product and service labelling

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	- Please refer to the country website of each MTN operation for more information. The websites of our two largest operations (Nigeria and South Africa) are listed below for easy reference https://www.mtn.co.za/Pages/Website_legal.aspx?termsID=327 http://www.mtnonline.com/sitemap	
G4-PR5	Results of surveys measuring customer satisfaction	IR: Non-financial data	117

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CATEGORY: Product responsibility			
ASPECT: Marketing communications			
	Disclosure on management approach	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)	
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 outcome	Not available	
CATEGORY: Product responsibility			
ASPECT: Customer privacy			
	Describe the approach to management and reporting of customer privacy	- SR: Sustainable Societies – digital human rights www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	20
G4-PR8	Number of substantiated complaints regarding breaches of customer privacy and losses of customer data	Not available	
CATEGORY: Product responsibility			
ASPECT: Compliance			
	Disclosure on management approach	https://www.mtn.com/Sustainability/Documents/Group_Social_and_Ethics_Statement_2013.pdf	
G4-PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx - IR: A word from our executive chairman www.mtn.com/Media/MTNNigeria/Pages/MTNNigeria.aspx	4