



MEMBER OF THE

*Ethics Institute
of South Africa*



MTN Group Limited

United Nations Global Compact Communication Of Progress (Cop)
for the year ended 31 December 2015



This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.

About the MTN Group

MTN is a leading emerging markets mobile operator at the forefront of global technological changes. Guided by our values, we are delivering a bold, new Digital World to our 232,5 million customers across Africa and the Middle East from our headquarters in Johannesburg.

In just over two decades, through our extensive investment in advanced communication infrastructure and by harnessing the talent of our people, we have grown rapidly to offer voice, data and digital services to retail customers in 22 countries where we have telecoms licences as well as enterprise solutions to corporate, SME and public sector customers in 25 countries. MTN is the most admired brand in Africa and the most valuable African brand#. With a market capitalisation of R245 billion, at end-December 2015 our Company was the sixth largest on the Johannesburg Stock Exchange.

OUR VISION

To lead the delivery of a bold, new Digital World to our customers



OUR MISSION

To make our customers' lives a whole lot brighter



Our values, which define our culture

Leadership

Innovation

Relationships

Integrity

Can do

Expressed through these vital behaviours:

Complete accountability

Get it done

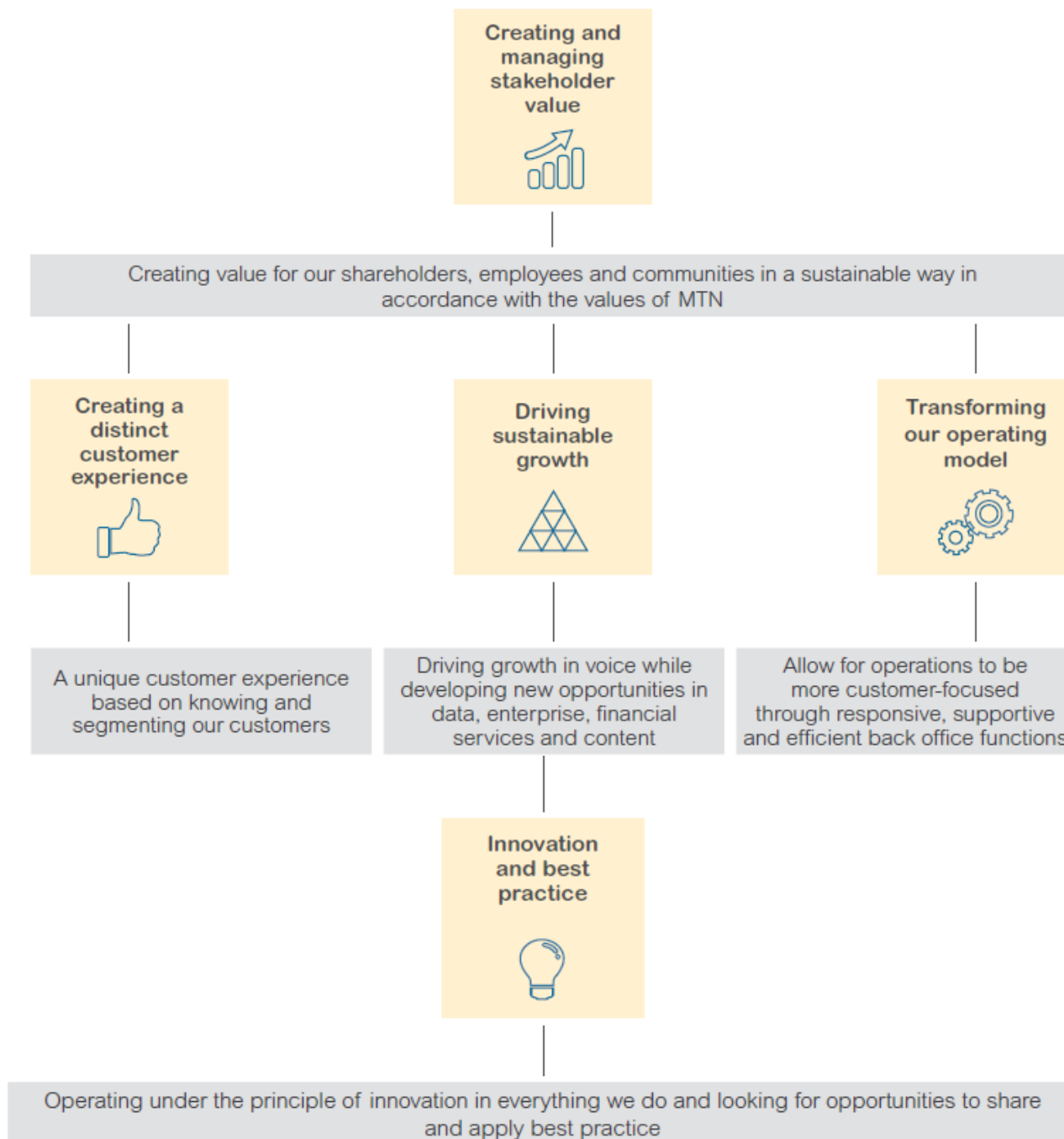
Active collaboration

Complete candour

Get it done

Our strategy

MTN's strategy is built around five strategic themes: **Creating and managing stakeholder value** and **innovation and best practice sharing** describe our approach to our work, people and other stakeholders. Tangible priorities under **creating a distinct customer experience**, **driving sustainable growth** and **transforming our operating model** define how we strive to secure a sustainable competitive advantage and deliver superior shareholder returns.



Contents

MTN Group Limited Statement of Recommitment to the UNGC	5
Scope of the Communication of Progress	6
Sustainability context	8
UNGC Communication of Progress for 2015	10

MTN Group Limited

Statement of Recommitment to the UNGC



To our stakeholders

MTN stands at the doorway of a tectonic shift in its industry. The opportunities for growth, both for MTN and for the countries in which we operate, are vast as the change in the industry gathers momentum, with revolutionary implications for every aspect of our lives. MTN recognises that our experiences in 2015 brought into sharp focus our role and responsibilities as a multinational and a major participant – in many instances a pioneer – in the developing countries in which we operate.

Our scale and reach as a leading mobile network operator in many of our markets, and our contribution to their socio-economic development as a provider of IT, imposes on MTN a higher burden of national responsibility, which we continue to strive to meet in ways that support the Ten Principles of the United Nations Global Compact.

I confirm that MTN Group Limited continues to support of the Ten Principles of the UNGC in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In our 2015 annual Communication of Progress we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Phuthuma Nhleko

Chairman of the Board/
Acting Group President and CEO
Mtn Group Ltd

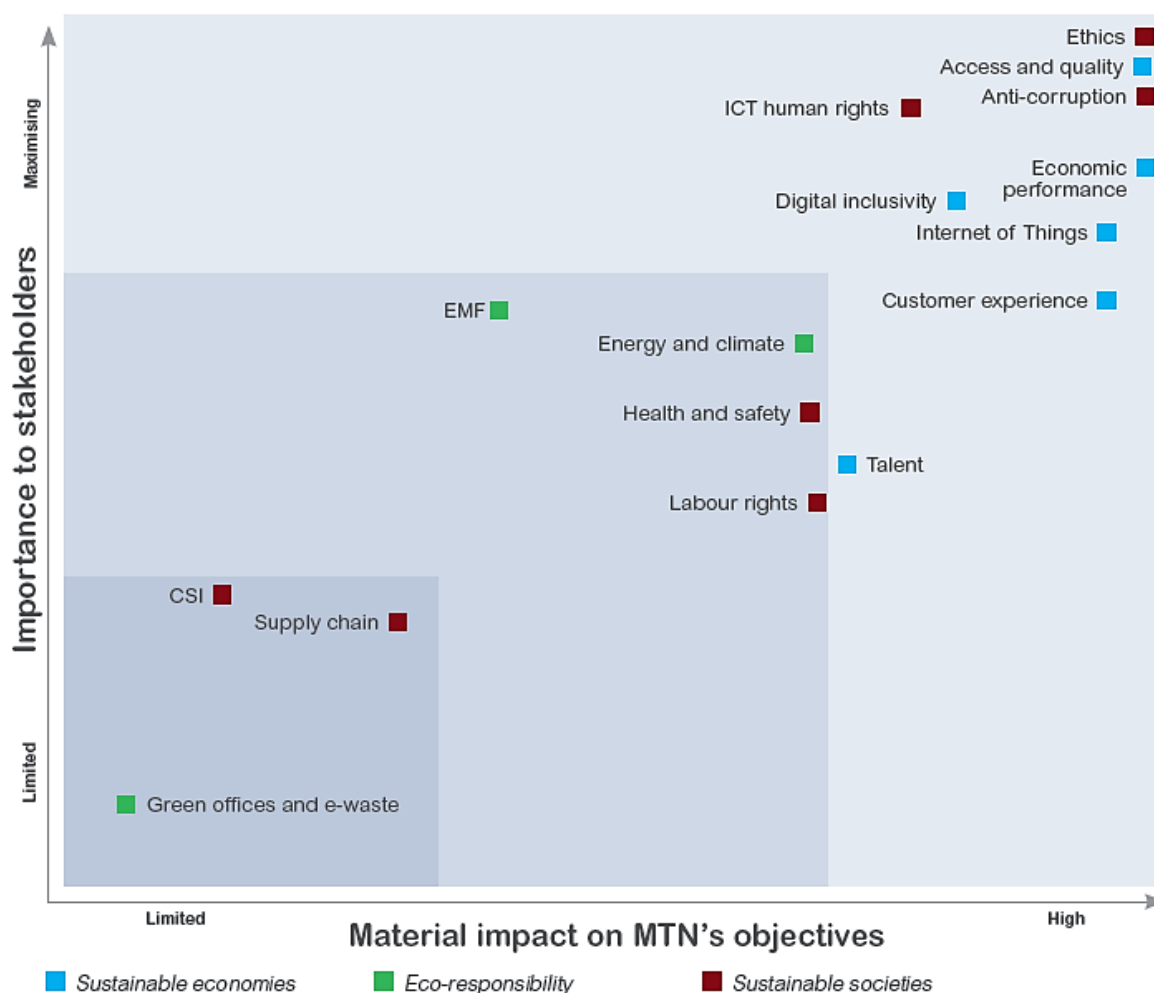
Scope of the COP

Materiality and stakeholder inclusiveness

As Global Compact signatory, MTN recognizes that the ten principles within the four issues areas of human rights, labour, environment and anti-corruption are material to the organisation and that these reflect significant economic, social and environmental impacts. We also recognize that the decisions and assessments of our stakeholders are substantially being influenced by the process and results of MTN's integration of the ten principles into our operations and strategies.

Material issues are those issues that impact our ability to remain commercially viable and socially relevant to stakeholders. The Group follows the guidance of the sustainability standards and protocols set out in the previous section, in structuring a framework for selecting material issues and assessing our performance across the economic, social and environmental issues that most impact our business and our stakeholders. Guidance is also sought by referring to developments, reports, publications and work efforts of industry bodies such as GSMA and ITU.

Our material sustainability issues of focus for 2015 are set out below:



To determine the issues most material to MTN's sustainability, we took the following sources into account:

- Feedback from internal and external stakeholders that review the annual sustainability report.
- Engagement with external stakeholders via letters or emails to the following: sustainability@mtn.co.za, investor.relations@mtn.co.za, foundations@mtn.co.za and mtngroup.pressoffice@mtn.co.za and to direct email addresses.

- Information gained through engagements with regulatory authorities, media organisations, civil society and community-based organisations, our customers, and general members of the public.
- Feedback from and engagement with the JSE SRI, the CDP, and MTN's investors, shareholders and research organisations that consult us or assess our responsible business performance.
- Information from third-party questionnaires and assessments of our publicly reported performance by university organisations and other third parties not commissioned by MTN.
- Our own internal review and research processes including industry, peer and global developments, and our risk and audit management processes.

Issues identified through this process were weighted during an internal materiality review. These issues were reviewed by the executive, and the Group social and ethics committees. We undertake this review periodically to ensure that we are responsive and can adapt to changing operating conditions.

Sustainability context

ICT changing the nature of societies, governments and businesses

The advancement of Information Communication Technology is transforming how we live, work and interact. In the same vein, owing to broadband connectivity and growing access to affordable mobile devices, ICT also empowers even the most marginalised of communities to have greater control over, and more meaningfully participate in, opportunities which can help them improve their lives.

Solutions to problems and opportunities to advance social development, some of which were inconceivable even five years ago, are fast becoming commonplace. The ubiquitous availability of mobile devices means people can now drive digital innovation from anywhere in the world. This level of transformation demands a shift in thinking, a change in traditional ways of working and delivering services, and comprehensive investments in new types of skills.

MTN's role in these changes

MTN is prepared for these changes. As an emerging markets operator, the materially larger upside of digital opportunities is mitigated by proportionally greater risks. We know that it is imperative to embrace these dynamics. Our vision of leading the delivery of a bold, new digital world is detailed in our business strategy, focusing on fundamentals such as how we create and manage stakeholder value, innovate, transform our operating model, drive sustainable growth and create distinct customer experiences. We invest in partnerships that offer solutions to challenges and take advantage of emerging opportunities.

MTN improving sustainability in its markets in 2015

MTN's role in improving sustainability in its markets in 2015 saw us continuing to implement changes to our operating model in order to align ourselves with the growing demand for digital services and solutions in our markets. Our e-commerce partnerships are enabling our customers to enjoy access to products previously only available in more developed countries. Partnering with tower management companies, we are better able to focus on core business delivery. This also helps us and other mobile operators to reduce some of our environmental impact. By investing in the development of local content in our markets, we actively encourage mobile application developers of all ages to develop solutions that can potentially help people participate in economic opportunities and overcome constraints such as lack of access to information, health and education services, among others.

Challenges MTN faced in 2015

The challenges MTN faced in 2015 were narrowed down to those which impacted our top nine operations, ultimately affecting the Group:

- Ensuring sound governance, ethics, legal compliance, and overcoming regulatory challenges.
- Political and economic developments and their impact on our markets.
- Increased competition and changes in the telecoms landscape.
- Operational execution, management changes in key markets and employee engagement.
- Delivering a consistent and distinct customer experience through all MTN touch points.
- Managing stakeholder relationship and the Group's reputation.

Actions taken to integrate sustainability into its core business activities in 2015

We continued to integrate sustainable business practices into our day-to-day activities. Institutionalisation of the Group's ethics management framework remained a priority. We are actively working to strengthen the culture of ethical and responsible practices across our business.

We continued to add sustainable economic value in the following ways:

- We helped to close the digital divide in our markets.
- MTN's digital inclusion investments broadly span across the financial, health, education, and enterprise and public sector categories.
- Collaborative, cross-sectoral partnerships and our support for public innovation is ensuring MTN catalyses availability of solutions relevant to societal, economic and environmental needs in our markets.

We further met our eco-responsibility imperatives by:

- Positively impacting energy consumption, physical infrastructure, and management of waste from consumption of electronic and other resources.
- Investing in energy-efficiency solutions and "green" power sources, saving 36 981 tonnes of GHG emissions since 2011 to reduce the impact of our operations.
- Conducting internal and public awareness campaigns and driving reductions in related office and electronic and electrical waste through initiatives such as the MTN Green Office and the Ericsson ECOM 2.0 partnership.

We contributed to sustainable societies by:

- Re-doubling our efforts towards improving internal awareness and practices expected in terms of our ethics framework and good governance practices.
- Reviewing our digital human rights due diligence processes to ensure customer, employee and operational safety and to balance stakeholders' rights more effectively.
- Maintaining our focus on employee health and safety, ensuring that no lives were lost in 2015.

MTN's sustainability focus for 2016

In 2016 we hope to continue to enable digital dividends for our stakeholders by harnessing the spirit of innovation and collaboratively developing solutions to opportunities and real-life challenges in our markets. We will continue to value good governance within MTN, and are committed to continue to implement the Fourth King Code of Corporate Governance, the United Nations Global Reporting Initiative (GRI 4) and Global Compact, carbon and climate impact reporting and the principles set out in the United Nations Protect, Respect and Remedy Framework.

Like all businesses, we face challenges from time to time, yet we are not deterred in our sustainability journey. As a major ICT player in emerging markets, we are acutely aware that our resources can make a meaningful difference to the lives of our customers and communities.

UNGC Communication of Progress for 2015

The UN GRI G4 Guidelines (which now include standard disclosures and core indicators) were used in preparation of this COP for 2015.



- Please also refer to the Group's UN GRI Report and Sustainability Report available on www.mtn.com/sustainability

Abbreviations

- COP: Communication of Progress for the year ended 31 December 2015
- IR: MTN Group Limited Integrated Report for the year ended 31 December 2015
- SR: MTN Group Sustainability Report for the year ended 31 December 2015

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
HIGH-LEVEL COMMITMENT AND STRATEGY			
G4-1	CEO statement on continued UNGC support	• Communication of Progress (COP) • IR: Interview with Group president and CEO • SR: Group Executive Chairman's message on Sustainability	• 2 • 4-9 • 3
G4-2	Impacts, risks and opportunities	• IR: Our top risk and opportunities and our response to these • IR: Risk management, compliance and corporate governance committee chairman's report	• 24-27 • 57
CONTEXT OF OPERATION AND VERIFICATION			
G4-3	Name of reporting organisation	• MTN Group Limited	
G4-4	Products, services	• IR: What we offer • https://www.mtn.com/MTNGROUP/ProductsandServices/Pages/	• 20-21; 42-43; 96-97
G4-6	Operating structure	• IR: Key changes to our operating structure	• 10
G4-5	Location of Headquarters	216 - 14th Avenue, Fairland, 2195, Gauteng, South Africa	
G4-6	Geographic scope / map of operations	• www.mtn.com (our growing footprint) • IR: Where we operate	• 2-3
G4-7	Nature of ownership and legal form	• IR: MTN Group Profile; footprint	• 2-3
G4-8	Profile of customer base	• IR: Where we operate • IR: Consumer Services • IR: Enterprise Business Services	• 2-3 • 27 • 97
G4-9	Scale of operations	• IR: About this report • SR: Sustainability value added statement • SR: About this report	• Pre-page 1 • 24 • 46
G4-13	Changes occurring within the reporting period	• 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
	Awards received	• https://www.mtn.com/Media/MoreInMedia/Pages/Awards.aspx	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
Assurance			
G4-33	Process to provide independent verification for the COP / Policy on independent assurance	- IR: Independent assurance report - SR: About MTN Sustainability	117 45
Governance			
G4-34	Company's governance structure (including major committees)	- IR: How we are governed - SR: About MTN Sustainability	51 45
G4-39	Is the chairman also an executive officer?	IR: How we are governed – board committees	48
G4-40	Board profile: number, gender, Executive vs. Non-executive	IR: How we are governed	49-50
G4-49	How do stakeholders provide recommendations to Board?	IR: How we are governed	51
G4-51	Link between remuneration and leadership performance	IR: Remuneration committee chairman's report	66
G4-41	Managing conflicts of interest	- IR: How we are governed - IR: Social and ethics committee report	40 62
G4-40	Process for determining leadership qualifications	IR: How we are governed	49
G4-42	Internally developed mission / value statements, principles or codes related to sustainability	SR: About MTN sustainability	45
G4-45	Board oversight of sustainability	- IR: How we are governed - SR: About MTN sustainability	49 45
G4-44	Processes for evaluating the board's sustainability performance	SR: About MTN sustainability	45
Stakeholder engagement			
G4-24	List of stakeholder groups	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	On-going mechanisms for stakeholder engagement: who, how, what outcomes	www.mtn.com/MTNGROUP/About/Pages/Stakeholders.aspx - SR: Our approach to sustainability	45
G4-27	Stakeholder concerns and how the organisation responded	www.mtn.com/MTNGROUP/About/Pages/Stakeholders.aspx - SR: Our approach to sustainability	45
-	How MTN's Communication of Progress (COP) has been shared with our stakeholders	- Publicly on www.mtn.com - Via intranet on MtnConnect	
DISCLOSURES ON MANAGEMENT APPROACH			
Economic			
EC:MD	Management approach: economic performance, market presence and indirect economic aspects	https://www.mtn.com/Investors/FinancialReporting/Pages/IntegratedReports.aspx https://www.mtn.com/Investors/FinancialReporting/Pages/AnnualResults.aspx https://www.mtn.com/Investors/FinancialReporting/Pages/InterimResults.aspx https://www.mtn.com/Investors/FinancialReporting/Pages/QuarterlyResults.aspx https://www.mtn.com/Investors/MoreinInvestors/Pages/Presentations.aspx	
Economic performance			
G4-EC1	Economic value added	- IR: Summarised consolidated financial statements www.mtn.com/investors/financialreporting	4 - 5
G4-EC2	Climate change related financial implications, 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.mtn.com/Sustainability/Documents/MTN_Group_2014_CDP_Report.pdf	19 12-17
G4-EC3	Defined benefit plan obligations	IR: Our people and their remuneration	66-95

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
G4-EC4	Significant financial assistance received from government	In some countries, standard government rebates to encourage investment in national skills development and training are available to employers. In South Africa 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 SA Revenue Services, have a payroll above a government-determined threshold, and make payments of 1% of monthly payroll costs to the National Skills Development Levy); the company invests this rebate into training and skills development programmes for staff as well as to develop skills for the labour market beyond the company as a contribution to socio-economic development of society.	
-	Capital investment in telecommunication network infrastructure broken down by country/region	IR: Where we operate	• 2
-	Net costs for MTN under the Universal Service Obligation when extending service to geographic locations and low-income groups, which are not profitable	The MTN Group has not separately calculated or ring-fenced the net costs of extending service to geographic locations and low-income communities which are not profitable, due to the nature of the business' operations in emerging markets across Africa and the Middle East, where low-income and geographic spread of markets are a core feature of some of these markets	
Market presence			
G4-EC5	Standard entry level wage compared to local minimum wage	The MTN Group pays entry level wages equal to or above local minimum wages in each country in which the Company operates	
G4-EC9	Policy, practices, and proportion of spending on locally-based suppliers	SR: Sustainability value added statement (black economic empowerment)	• 25
G4-EC6	Procedures for local hiring (including senior management)	The MTN Group hires locally as far as possible. Only 1.1% of the local staff base across the Group comprises expatriate members. We do not indicate expatriate members by management level. See SR: Sustainability value added statement	• 24
Indirect economic impacts			
G4-EC7	Positive public impact of pro bono / donated infrastructure and services	https://www.mtn.com/Investors/Pages/Overview.aspx https://www.mtn.com/SocialResponsibility/Pages/default.aspx	• 13
G4-EC8	Significant indirect economic impacts, including extent	- IR: MTN's value creation - SR: Sustainability value added statement https://www.mtn.com/SocialResponsibility/Pages/default.aspx	• 18 • 24
ENVIRONMENTAL			
Indirect economic impacts			
EN:MD	Management approach: energy, water, materials, biodiversity, emissions, effluents, and waste	- SR: Eco-responsibility – energy and climate - SR: Sustainability value added statement www.mt.com/sustainability/MoreonSustainability/Pges/DocumentsLibrary.aspx	• 13 • 25
Materials			
G4-EN1	Materials used: weight / volume	The most material resource used is electronic and electrical equipment. - SR: Eco-responsibility - e-waste - SR: Sustainability value added statement	• 12 • 25
G4-EN2	Percentage of recycled materials used	Due to the nature of products and services offered the MTN Group does not consider this indicator to be material for its operations. The Group is, however, addressing downstream recycling of its e-waste and that of its customers in South Africa	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
Energy			
G4-EN3	Direct energy use: by primary source	- SR: Eco-responsibility – energy and climate https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN	• 13
G4-EN4	Indirect energy use: by primary source	- SR: Eco-responsibility – energy and climate https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN	• 13
G4-EN5	Energy saved due to efficiencies	- SR: Eco-responsibility – energy and climate https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN	• 13
G4-EN6	Energy efficiency / renewable energy initiatives	- SR: Eco-responsibility – energy and climate https://www.mtn.com/Sustainability/Ecoresponsibility/Pages/energymangement.aspx https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN	• 13
G4-EN6	Initiatives to reduce indirect energy consumption	- SR: Eco-responsibility – energy and climate https://www.mtn.com/Sustainability/Ecoresponsibility/Pages/energymangement.aspx https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN	• 13
Water			
G4-EN8	Total water withdrawal by source	SR: Eco-responsibility	• 12-17
G4-EN9	Water sources significantly affected by withdrawal of water	Not material as indicated above	
G4-EN10	Percentage and total water volume of water recycled and reused	Not material as indicated above	
Biodiversity			
G4-EN11	Location and size of land owned, leased or managed in biodiversity-rich habitats	The MTN Group does not currently report against this indicator	
G4-EN12	Impacts of operations on areas of high biodiversity value	- SR: Eco-responsibility – environmental management https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf	• 12-17
G4-EN13	Habitats protected or restored	Due to the nature of MTN's business, the Group does not report against this indicator. However, environmental impact assessments are undertaken as part of network infrastructure and facilities implementation. https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf	
G4-EN13	How are impacts on biodiversity being managed?	Due to the nature of MTN's business, the Group does not report against this indicator. However, environmental impact assessments are undertaken as part of network infrastructure and facilities implementation. https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf	
G4-EN14	Number of conservation list species affected by operations	Due to the nature of MTN's business, this Group does not report against this indicator. However, environmental impact assessments are undertaken as part of network infrastructure and facilities implementation. https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf	
Emissions, effluents and wastes			
G4-EN15	Total direct and indirect greenhouse gas emissions by weight	SR: Eco-responsibility – energy and climate	• 13
G4-EN16		- SR: Sustainability value added statement https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN	• 25
G4-EN17	Other relevant indirect greenhouse emissions by weight	- 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	Initiatives to reduce greenhouse gas emissions and reductions achieved	- SR: Eco-responsibility – energy and climate - IR: MTN's value creation https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN	13 25
G4-EN20	Emissions of ozone-depleting substances by weight	Due to the nature of MTN's business, this indicator is not material https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN	
G4-EN21	NO _x , SO _x , and other significant air emissions by weight and type	Due to the nature of MTN's business, this indicator is not material	
G4-EN22	Total water discharge by quality and destination	The only water discharged is through the municipal sewer. Due to the nature of MTN's business, this indicator is not material	
G4-EN23	Total amount of waste by type and disposal method	The most material waste generated is old / redundant is electronic and electrical equipment.	
		- SR: Eco-responsibility – environmental management - SR: Sustainability value statement	17 25
G4-EN24	Total number and volume of significant spills	Not available	
G4-EN25	Weight of transported, imported, exported or treated hazardous waste	The most material waste subject to this convention is 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 early 2015 by MTN Benin and Ericsson. E-waste collected will be shipped from Benin 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	Water discharge impacts on biodiversity and water bodies	- Although not a material aspect for the Group, see SR: Eco-responsibility – infrastructure environmental management www.mtn.com/sustainability/MoreonSustainability/Pages/DOCUMENTSLibrary.aspx	18 – 19
Products and Services			
G4-EN27	Initiatives to mitigate environmental impacts	- 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 reclaimed products / packaging materials	SR: sustainability value added statement	25
Compliance			
G4-EN29	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Not available	
Transport			
G4-EN30	Significant environmental impacts of transport use: for products, materials, members of the workforce	- Although transportation is not a source of significant environmental impacts and is not deemed material, greenhouse gas emissions associated with transport are quantified. - SR: Eco-responsibility – energy and climate - SR: Sustainability value added statement https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN	13 25

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
Overall			
G4-EN31	Environmental protection expenditure	- SR: Eco-responsibility – environmental management https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentLibrary.aspx	• 12
LABOUR PRACTICES AND DECENT WORK			
<i>Disclosure on management approach</i>			
LA:MD	Management approach: employment, labour relations, occupational health and safety, training and education and diversity and equal opportunity	- 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. - IR: Our people and their remuneration	68-69
<i>Employment</i>			
G4-LA1	Employee numbers	SR: Sustainability value added statement	• 24
G4-LA1	Employee turnover	SR: Sustainability value added statement	• 24
G4-LA2	Full-time employee benefits not provided to temporary / part-time employees	IR: How we remunerate our people	• 70-95
<i>Labour/Management relations</i>			
G4-LA	Percentage unionised employees	Not available	
G4-LA4	Minimum notice period/s regarding significant operational changes	The Group does provide internal notification to employees regarding significant operational changes. These vary depending on the nature and scope of the change. 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, s/he 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.	
<i>Occupational health and safety</i>			
G4-LA5	Employee representation in health and safety committees	SR: Sustainable societies – the workplace	• 22
G4-LA6	Total number of work-related fatalities, rates of injury, occupational diseases, lost days and absenteeism	- SR: Sustainable societies – the workplace - SR: Sustainability value added statement - Occupational diseases are not a feature of our business, given the nature 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
G4-LA7	Employee wellness programmes regarding serious diseases	- SR: Annual sustainability statement – sustainable societies - MTN Group has partnered with ICAS, an international risk management services as our employee wellness provider who offer assistance on various issues but mainly counselling as the first phase of issue management. Wellness for serious diseases is also done through the medical aid	• 18-22
G4-LA4	Health and safety topics covered in formal agreements with trade unions	Not available	
IO3	Practices to ensure health and safety of field personnel involved in the installation, operation and maintenance of masts, base stations, laying cables and other activities	https://www.mtn.com/Sustainability/Documents/Mobile_and_Health_2013.pdf	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
Training and education			
G4-LA9	Average hours of training per employee per year	Employees are actively encouraged to continuously take advantage of opportunities to improve their capabilities and skills through extensive training available digitally, face-to-face and from other sources supplied by the MTN Academy, or from external accredited and reputable organisations. MTN Academy regularly 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-LA10	Employee skills and training programmes	• SR: Sustainability value added statement • As part of our training and development initiative we offer courses to our employees in the subjects of business acumen, commercial, leadership and behavioural, organisation development and technology. Based on 2015 results, 84 % of courses completed were related to technology, followed by business acumen at 4,7 %. • E-Learning as well as instructor-led programmes of the MTN Academy cover all disciplines of work. A dedicated e-learning catalogue focusing only on telecoms specific e-learning is also in use. • SR: Annual sustainability statement	• 24
G4-LA11	% employees receiving performance reviews and career development	• SR: Annual sustainability statement	• 24
Diversity and equal opportunity			
G4-LA12	Composition of governance bodies	• IR: Who is responsible • SR: Sustainability value added statement	• 44 • 24
G4-LA13	Ratio of basic salary of men to women by employee category	The MTN Group does not currently report against this indicator	
LA15	Return to work and retention rates after parental leave, by gender	The MTN Group does not currently report against this indicator	
HUMAN RIGHTS			
Disclosure on management approach			
HR:MD	Management approach: investment and procurement practices, non-discrimination, freedom of association and collective bargaining, abolition of child labour, prevention of forced and compulsory labour, complaints and grievance practices, security practices, and indigenous rights	• SR: Sustainable societies – digital human rights • https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx • MTN Group adheres to specifications of the International Labour Organisation Protocol on decent work and working conditions (core standards of freedom of association, forced labour, child labour, anti-discrimination). These are integrated in the Group Code of Ethics, and included in the Group Social and Ethics Committee's terms of reference.	• 20
Investment and procurement activities			
G4-HR1	Percentage and number of significant investments that have undergone human rights screening	• Not available	
G4-HR1	Percentage of significant suppliers and contractors that have undergone human rights screening	• Not available	
G4-HR2	Total hours and number of employees receiving human rights training	• Not available	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
<i>Non-discrimination</i>			
G4-HR3	Number of incidents of discrimination and action taken	- Not available - Entrenched in the Group's code of ethics are noted transgressions that carry serious penalties for any person who offends another based on colour, race, creed, political association or injury to a 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)	
<i>Freedom of association and collective bargaining</i>			
G4-HR4	Any incidents where freedom of association / collective bargaining was at risk? Actions taken?	- No incidents reported. - 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
<i>Child Labour</i>			
G4-HR5	Any incidents of child labour and measures taken?	0 % - In 2011 the MTN Group specifically assessed whether it was compliant with the ILO child labour minimum age specification, and found that it was, with the youngest employee being 17 years of age at the time.	
<i>Forced and compulsory labour</i>			
G4-HR6	Any incidents of forced labour and measures taken?	No incidents	
<i>Security practices</i>			
G4-HR7	Percentage of security personnel trained in human rights	Due to the nature of MTN's business, this indicator is not applicable	
<i>Indigenous rights</i>			
G4-HR8	Any incidents where indigenous people's rights were violated and measures taken?	The MTN Group does not track this indicator	
G4-HR9	Percentage and total number of operations that have undergone human rights reviews	0% in terms of indigenous rights	
G4-HR12	Number of human rights grievances filed, and resolved through formal mechanisms	The MTN Group does not track this indicator	
SOCIETY			
<i>Disclosure on management approach</i>			
SO:MD	Management approach: community, corruption, public policy, anti-competitive behaviour and compliance	- IR: How we are governed – risk management - IR: How we are governed – social and ethics statement www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	• 61 • 62
<i>Community</i>			
G4-SO1	Percentage of operations with local community engagement, impact assessments, and development programs.	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	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
Corruption			
G4-SO3	Total number and percentage and of operations assessed for risks related to corruption and the significant risks identified	- The annual Group Culture Audit contains a Corporate Integrity Index the results of which indicating employee perceptions of corporate integrity. A Group-wide corporate integrity survey which specifically includes corruption is planned for 1 – 10 June 2016, with each of 22 Opcos receiving their specific integrity risk profile. - IR: Our top risks and what we are doing about them - IR: How we are governed – Risk management - IR: How we are governed – Social and Ethics Committee report	24-27 58-61 62-63
G4-SO4	Communication and training on anticorruption 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	Actions taken in response to incidents of corruption	Due disciplinary processes are followed to investigate and resolve matters of ill-discipline including corruption. Sanctions may range from warnings to termination of employment	
Public policy			
G4-SO6	Engagement in public policy	https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx - Public policy engagement is undertaken in the following means: - Via any matters of consideration by the GSMA Board, due to the fact that the Group's President and CEO is a member of this 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)	
G4-SO6	Financial / in-kind contributions to political parties	No contributions made by the management company in 2015	
Anti-competitive behaviour			
G4-SO7	Number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	https://www.mtn.com/PressOffice/MTNIran/Pages/MTNIran.aspx	
Compliance			
G4-SO8	Monetary value of significant fines and number of non-monetary sanctions for non-compliance with 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
G4-SO9	Operations with significant negative impacts on local communities.	None	
G4-SO10	Prevention and mitigation of significant negative impacts on local communities, by operation	https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
PRODUCT RESPONSIBILITY			
<i>Disclosure on management approach</i>			
G4-PR:MD	Management approach: customer health and safety, product and service labelling, marketing communications, customer privacy, and compliance.	https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	
<i>Customer health and safety</i>			
G4-PR1	Life cycle stages of products / services assessed for health and safety impacts : incl. % of products / services assessed	https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx	
G4-PR2	Incidents of regulatory non-compliance concerning health and safety impacts of products and services	Not available	
G4-PA8	Policies and practices to publicly communicate on EMF related issues	Not available	
G4-PA9	Total amount invested in programmes and activities in electromagnetic field research	Not available	
<i>Product and service labelling</i>			
G4-PR3	Product / service information required by procedures	- Please refer to the country website of each MTN operation for more information. The websites of our two largest operations are listed below for easy reference: https://www.mtn.co.za/Pages/Website_legal.aspx?termsID=327 http://www.mtnonline.com/sitemap	
G4-PR3	Incidents of regulatory non-compliance concerning product and service information labelling	None	
G4-PR5	Customer satisfaction practices: surveys etc.	IR: Non-financial data	117
<i>Marketing communications</i>			
G4-PR6	Adherence to marketing, promotions and communications standards	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	Incidents of regulatory non-compliance concerning marketing communications	Not available	
G4-PR7	Initiatives to ensure clarity of charges and tariffs	Included in marketing and product information	
G4-PR7	Initiatives to inform customers about product features and applications that will promote responsible, efficient, cost effective and environmentally preferable use	Included in marketing and product information	
<i>Customer privacy</i>			
G4-PR8	Incidents of substantiated breaches of customer privacy and losses of customer data	Not available	

UNGC Principle	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)
HUMAN RIGHTS	
Principle 1: Human Rights <i>Businesses should support and respect the protection of internationally proclaimed human rights</i>	GRI Disclosures to report actions taken to implement Principle 1 and outcomes from implementing Principle 1 Indicators Human Rights: Aspect Investment: 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 0 % Aspect Security Practices: G4-HR7: PERCENTAGE OF SECURITY PERSONNEL TRAINED IN THE ORGANIZATION'S HUMAN RIGHTS POLICIES OR PROCEDURES THAT ARE RELEVANT TO OPERATIONS - Due to the nature of MTN's business, this indicator is not applicable Aspect: Indigenous Rights G4-HR8: TOTAL NUMBER OF INCIDENTS OF VIOLATIONS INVOLVING RIGHTS OF INDIGENOUS PEOPLES AND ACTIONS TAKEN 0% in terms of indigenous rights Aspect Assessment G4-HR9: TOTAL NUMBER AND PERCENTAGE OF OPERATIONS THAT HAVE BEEN SUBJECT TO HUMAN RIGHTS REVIEWS OR IMPACT ASSESSMENTS 0 % Aspect Human Rights Grievance Mechanisms G4-HR12: NUMBER OF GRIEVANCES ABOUT HUMAN RIGHTS IMPACTS FILED, ADDRESSED, AND RESOLVED THROUGH FORMAL GRIEVANCE MECHANISMS - The MTN Group does not track this indicator Society: Aspect: Local Communities G4-SO1: PERCENTAGE OF OPERATIONS WITH IMPLEMENTED LOCAL COMMUNITY ENGAGEMENT, IMPACT ASSESSMENTS, AND DEVELOPMENT PROGRAMS 68 % of MTN operations (15 countries) have a formal Foundation. 100% of operations undertake development programmes through enterprise development, volunteering, and community-based sponsorships such as in education or health-related fields. The impact of community investment has not been assessed by MTN Group G4-SO2: OPERATIONS WITH SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE IMPACTS ON LOCAL COMMUNITIES - None Outcomes from implementing Principle 1 G4-HR8 - ANY INCIDENTS WHERE INDIGENOUS PEOPLE'S RIGHTS WERE VIOLATED AND MEASURES TAKEN? - The MTN Group does not track this indicator G4-HR12 - NUMBER OF HUMAN RIGHTS GRIEVANCES FILED, AND RESOLVED THROUGH FORMAL MECHANISMS The MTN Group does not track this indicator

UNGC Principle	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)
Principle 2 Businesses should make sure that they are not complicit in human rights abuses	GRI Disclosures to report actions taken to implement Principle 2 and outcomes from implementing Principle 2 Indicators Human Rights: Aspect Investment: G4-HR1: TOTAL NUMBER AND PERCENTAGE OF SIGNIFICANT INVESTMENT AGREEMENTS AND CONTRACTS THAT INCLUDE HUMAN RIGHTS CLAUSES OR THAT UNDERWENT HUMAN RIGHTS SCREENING - Not available Aspect Supplier Human Rights Assessment G4-HR10: PERCENTAGE OF NEW SUPPLIERS THAT WERE SCREENED USING HUMAN RIGHTS CRITERIA 0% G4-HR11: SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE HUMAN RIGHTS IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN 0 %
LABOUR	
Principle 3 Businesses should uphold the freedom of association and the effective recognition to the right to collective bargaining	GRI Disclosures to report actions taken to implement Principle 3 and outcomes from implementing Principle 3 General Standard Disclosures Organizational Profile G4-11 a. Report the percentage of total employees covered by collective bargaining agreements. - Not available Indicators Human Rights: Aspect Freedom of Association and Collective Bargaining G4-HR4: OPERATIONS AND SUPPLIERS IDENTIFIED IN WHICH THE RIGHT TO EXERCISE FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING MAY BE VIOLATED OR AT SIGNIFICANT RISK, AND MEASURES TAKEN TO SUPPORT THESE RIGHTS - The MTN Group does not currently report against this indicator Labour: Aspect Labour/Management Relations G4-LA4: MINIMUM NOTICE PERIODS REGARDING OPERATIONAL CHANGES, INCLUDING WHETHER THESE ARE SPECIFIED IN COLLECTIVE AGREEMENTS - The Group does provide internal notification to employees regarding significant operational changes. These vary depending on the nature and scope of the change. 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, s/he 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 generous retrenchment policy relative to severance pay

UNGC Principle	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)
Principle 4 The elimination of all forms of forced and compulsory labour	GRI Disclosures to report actions taken to implement Principle 4 and outcomes from implementing Principle 4 Indicators Human Rights: Aspect: Forced or Compulsory Labour G4-HR6: OPERATIONS AND SUPPLIERS IDENTIFIED AS HAVING SIGNIFICANT RISK FOR INCIDENTS OF FORCED OR COMPULSORY LABOR, AND MEASURES TO CONTRIBUTE TO THE ELIMINATION OF ALL FORMS OF FORCED OR COMPULSORY LABOUR No incidents
Principle 5 The effective abolition of child labour	GRI Disclosures to report actions taken to implement Principle 5 and outcomes from implementing Principle 5 Indicators Human Rights: Aspect Child Labour G4-HR5: OPERATIONS AND SUPPLIERS IDENTIFIED AS HAVING SIGNIFICANT RISK FOR INCIDENTS OF CHILD LABOR, AND MEASURES TAKEN TO CONTRIBUTE TO THE EFFECTIVE ABOLITION OF CHILD LABOUR 0 % - In 2011 the MTN Group specifically assessed whether it was compliant with the ILO child labour minimum age specification, and found that it was, with the youngest employee being 17 years of age at the time.
Principle 6 The elimination of discrimination in respect of employment and occupation	GRI Disclosures to report actions taken to implement Principle 6 and outcomes from implementing Principle 6 General Standard Disclosures Organizational Profile G4-10 - Report the total number of employees by employment contract and gender. - Report the total number of permanent employees by employment type and gender. - Report the total workforce by employees and supervised workers and by gender. - Report the total workforce by region and gender. - Report whether a substantial portion of the organization's work is performed by workers who are legally recognized as self-employed, or by individuals other than employees or supervised workers, including employees and supervised employees of contractors. - Report any significant variations in employment numbers (such as seasonal variations in employment in the tourism or agricultural industries). - Sustainability Report: Sustainability value added statement – page 24 Indicators Economic: Aspect: Market Presence G4-EC5: RATIOS OF STANDARD ENTRY LEVEL WAGE BY GENDER COMPARED TO LOCAL MINIMUM WAGE AT SIGNIFICANT LOCATIONS OF OPERATION - Not available

G4-EC6: PROPORTION OF SENIOR MANAGEMENT HIRED FROM THE LOCAL COMMUNITY AT SIGNIFICANT LOCATIONS OF OPERATION

- The MTN Group hires locally as far as possible. Only 1.1% of the local staff base across the Group comprises expatriate members
- Sustainability report: Sustainability value added statement page 24

Labour Practices and Decent Work:

Aspect: Employment

G4-LA1: TOTAL NUMBER AND RATES OF NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER BY AGE GROUP, GENDER AND REGION

- Not available

G4-LA3: RETURN TO WORK AND RETENTION RATES AFTER PARENTAL LEAVE, BY GENDER

- Not available

Aspect: Training and Education

G4-LA9: AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE BY GENDER, AND BY EMPLOYEE CATEGORY

- Sustainability Report: Annual Sustainability Statement page 24

G4-LA11: PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS, BY GENDER AND BY EMPLOYEE CATEGORY

- Sustainability Report: Annual Sustainability Statement page 24

Aspect: Diversity and Equal Opportunity

G4-LA12: COMPOSITION OF GOVERNANCE BODIES AND BREAKDOWN OF EMPLOYEES PER EMPLOYEE CATEGORY ACCORDING TO GENDER, AGE GROUP, MINORITY GROUP MEMBERSHIP, AND OTHER INDICATORS OF DIVERSITY

- Integrated Report: How we are governed (page 50)
- Sustainability Report: Sustainability value added statement (pages 24 and 46)

Aspect: Equal Remuneration for Women and Men

G4-LA13: RATIO OF BASIC SALARY AND REMUNERATION OF WOMEN TO MEN BY EMPLOYEE CATEGORY, BY SIGNIFICANT LOCATIONS OF OPERATION

- Not available

Human Rights:

Aspect: Non-discrimination

G4-HR3: TOTAL NUMBER OF INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTIONS TAKEN

- Not available

ENVIRONMENT

Principle 7

Businesses should support a precautionary approach to environmental challenges

GRI Disclosures to report actions taken to implement Principle 7 and outcomes from implementing Principle 7

Indicators

Economic:

Aspect: Economic Performance

G4-EC2: FINANCIAL IMPLICATIONS AND OTHER RISKS AND OPPORTUNITIES FOR THE ORGANIZATION'S ACTIVITIES DUE TO CLIMATE CHANGE

- IR: MTN's value creation - page 19
- Sustainability Report: 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>

Environmental:

Aspect: Materials

G4-EN1: MATERIALS USED BY WEIGHT OR VOLUME

The most material resource used is electronic and electrical equipment.

- Sustainability Report: Eco-responsibility - e-waste (page 16)
- Sustainability Report: Sustainability value added statement (page 25)

Aspect: Energy

G4-EN3: ENERGY CONSUMPTION WITHIN THE ORGANIZATION

- Sustainability Report: Eco-responsibility – energy and climate (pages 13-15)
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

Aspect Water

G4-EN8: TOTAL WATER WITHDRAWAL BY SOURCE

- 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 are addressed.
- A number of MTN operations are currently implementing the Group Green Office toolkit, for water-saving opportunities at offices and similar premises

Aspect: Emissions

G4-EN15: DIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 1)

- SR: Eco-responsibility – energy and climate – page 13
- SR: Sustainability value added statement – page 25
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN16: ENERGY INDIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 2)

- SR: Eco-responsibility – energy and climate – page 13
- SR: Sustainability value added statement – page 25
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN17: OTHER INDIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 3)

- SR: Eco-responsibility – energy and climate – page 13
- SR: Sustainability value added statement – page 25
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN20: EMISSIONS OF OZONE-DEPLETING SUBSTANCES (ODS)

- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN21: NOX, SOX, AND OTHER SIGNIFICANT AIR EMISSIONS

- Due to the nature of MTN's business, this indicator is not material

Aspect: Products and Services

G4-EN27: EXTENT OF IMPACT MITIGATION OF ENVIRONMENTAL IMPACTS OF PRODUCTS AND SERVICES

- 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 (page 9)
- <https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudy>

Aspect: Overall

G4-EN31: TOTAL ENVIRONMENTAL PROTECTION EXPENDITURES AND INVESTMENTS BY TYPE

- SR: Eco-responsibility – environmental management (page 12)
- https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf

- <https://www.mtn.com/Sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx>
- https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf
- https://www.mtn.com/Sustainability/Documents/Mobile_and_Health_2013.pdf

ENVIRONMENT (continued)

Principle 8 Undertake initiatives to promote greater environmental responsibility

GRI Disclosures to report actions taken to implement Principle 8 and outcomes from implementing Principle 8

Indicators

Environmental:

Aspect: Materials

G4-EN1: MATERIALS USED BY WEIGHT OR VOLUME

The most material resource used is electronic and electrical equipment.

- Sustainability Report: Eco-responsibility - e-waste (page 12)
- Sustainability Report: Sustainability value added statement (page 25)

G4-EN2: PERCENTAGE OF MATERIALS USED THAT ARE RECYCLED INPUT MATERIALS

Due to the nature of products and services offered the MTN Group does not consider this indicator to be material for its operations. The Group is, however, addressing downstream recycling of its e-waste and that of its customers in South Africa

Aspect: Energy

G4-EN3: ENERGY CONSUMPTION WITHIN THE ORGANIZATION

- SR: Eco-responsibility – energy and climate page 13
- SR: Sustainability value added statement page 25

<https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN4: ENERGY CONSUMPTION OUTSIDE OF THE ORGANIZATION

- SR: Eco-responsibility – energy and climate pages 13

<https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN5: ENERGY INTENSITY

- SR: Eco-responsibility – energy and climate pages 13

<https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN6: REDUCTION OF ENERGY CONSUMPTION

- SR: Eco-responsibility – energy and climate pages 13

<https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN7: REDUCTIONS IN ENERGY REQUIREMENTS OF PRODUCTS AND SERVICES

- SR: Eco-responsibility – energy and climate pages 13
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

Aspect: Water

G4-EN8: TOTAL WATER WITHDRAWAL BY SOURCE

- 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 are addressed. MTN Nigeria and MTN Cyprus are currently working towards ISO 14001 certification. Other operations, while not ISO 14001 certified, maintain safety, health and environmental policies, and as part of 2015's 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
- www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx

G4-EN9: WATER SOURCES SIGNIFICANTLY AFFECTED BY WITHDRAWAL OF WATER

- Not material as indicated above

G4-EN10: PERCENTAGE AND TOTAL VOLUME OF WATER RECYCLED AND REUSED

- Not material as indicated above

Aspect: Biodiversity

G4-EN11: OPERATIONAL SITES OWNED, LEASED, MANAGED IN, OR ADJACENT TO, PROTECTED AREAS AND AREAS OF HIGH BIODIVERSITY VALUE OUTSIDE PROTECTED AREAS

- The MTN Group does not currently report against this indicator

G4-EN12: DESCRIPTION OF SIGNIFICANT IMPACTS OF ACTIVITIES, PRODUCTS, AND SERVICES ON BIODIVERSITY IN PROTECTED AREAS AND AREAS OF HIGH BIODIVERSITY VALUE OUTSIDE PROTECTED AREAS

- SR: Eco-responsibility – environmental management (page 13)
- https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf

G4-EN13: HABITATS PROTECTED OR RESTORED

- Due to the nature of MTN's business, the Group does not report against this indicator. However, environmental impact assessments are undertaken as part of network infrastructure and facilities implementation.
- https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf

G4-EN14: TOTAL NUMBER OF IUCN RED LIST SPECIES AND NATIONAL CONSERVATION LIST SPECIES WITH HABITATS IN AREAS AFFECTED BY OPERATIONS, BY LEVEL OF EXTINCTION RISK

- Due to the nature of MTN's business, this Group does not report against this indicator. However, environmental impact assessments are undertaken as part of network infrastructure and facilities implementation.
- https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf

Aspect: Emissions

G4-EN15: DIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 1)

- SR: Eco-responsibility – energy and climate (page 13)
 - SR: Sustainability value added statement (page 24)
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN16: ENERGY INDIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 2)

- SR: Eco-responsibility – energy and climate (page 13)
 - SR: Sustainability value added statement (page 24)
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN17: OTHER INDIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 3)

- SR: Eco-responsibility – energy and climate (page 13)
 - SR: Sustainability value added statement (page 24)
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN18: GREENHOUSE GAS (GHG) EMISSIONS INTENSITY

- SR: Eco-responsibility – energy and climate (page 13)
 - SR: Sustainability value added statement (page 24)
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN19: REDUCTION OF GREENHOUSE GAS (GHG) EMISSIONS

- SR: Eco-responsibility – energy and climate (page 13)
 - SR: Sustainability value added statement (page 24)
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN20: EMISSIONS OF OZONE-DEPLETING SUBSTANCES (ODS)

- Due to the nature of MTN's business, this indicator is not material
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

G4-EN21: NOX, SOX, AND OTHER SIGNIFICANT AIR EMISSIONS

- Due to the nature of MTN's business, this indicator is not material

Aspect: Effluents and Waste

G4-EN22: TOTAL WATER DISCHARGE BY QUALITY AND DESTINATION

- The only water discharged is through the municipal sewer. Due to the nature of MTN's business, this indicator is not material

G4-EN23: TOTAL WEIGHT OF WASTE BY TYPE AND DISPOSAL METHOD

The most material waste generated is old / redundant is electronic and electrical equipment.

- SR: Eco-responsibility (page 17)
- SR: Sustainability value statement (page 25)

G4-EN24: TOTAL NUMBER AND VOLUME OF SIGNIFICANT SPILLS

No significant spills were reported by MTN operations

- SR: Eco-responsibility – e-waste (page 13)
- SR: Sustainability value statement (page 24)

G4-EN25: WEIGHT OF TRANSPORTED, IMPORTED, EXPORTED, OR TREATED WASTE DEEMED HAZARDOUS UNDER THE TERMS OF THE BASEL CONVENTION² ANNEX I, II, III, AND VIII, AND PERCENTAGE OF TRANSPORTED WASTE SHIPPED INTERNATIONALLY

- The most material waste subject to this convention is 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 early 2015 by MTN Benin and Ericsson. E-waste collected will be shipped from Benin to South Africa, and is therefore subject to the convention. We will report on weight in 2016.
- SR: Eco-responsibility – environmental management (page 18)
- SR: Sustainability value added statement (page 25)

G4-EN26: IDENTITY, SIZE, PROTECTED STATUS, AND BIODIVERSITY VALUE OF WATER BODIES AND RELATED HABITATS SIGNIFICANTLY AFFECTED BY THE ORGANIZATION'S DISCHARGES OF WATER AND RUNOFF

- Although not a material aspect for the Group, see SR: Eco-responsibility – infrastructure environmental management (page 17)
- www.mtn.com/sustainability/MoreonSustainability/Pages/DocumentsLibrary.aspx

Aspect: Products and Services

G4-EN27: EXTENT OF IMPACT MITIGATION OF ENVIRONMENTAL IMPACTS OF PRODUCTS AND SERVICES

- 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 (pages 9)

G4-EN28: PERCENTAGE OF PRODUCTS SOLD AND THEIR PACKAGING MATERIALS THAT ARE RECLAIMED BY CATEGORY

- SR: sustainability value added statement (page 25)

Principle 8 Undertake initiatives to promote greater environmental responsibility	Aspect: Compliance G4-EN29: MONETARY VALUE OF SIGNIFICANT FINES AND TOTAL NUMBER OF NONMONETARY SANCTIONS FOR NON-COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS - The Group's legal department receives reports from operations on non-compliances and fines issued to the operations Aspect: Transport G4-EN30: SIGNIFICANT ENVIRONMENTAL IMPACTS OF TRANSPORTING PRODUCTS AND OTHER GOODS AND MATERIALS FOR THE ORGANIZATION'S OPERATIONS, AND TRANSPORTING MEMBERS OF THE WORKFORCE - Although transportation is not a source of significant environmental impacts and is not deemed material, greenhouse gas emissions associated with transport are quantified. - SR: Eco-responsibility – energy and climate (page 13) - SR: Sustainability value added statement (page 25) https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN Aspect: Overall G4-EN31: TOTAL ENVIRONMENTAL PROTECTION EXPENDITURES AND INVESTMENTS BY TYPE - SR: Eco-responsibility – environmental management (page 12) https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf https://www.mtn.com/Sustainability/Documents/Mobile_and_Health_2013.pdf Aspect: Supplier Environmental Assessment G4-EN32: PERCENTAGE OF NEW SUPPLIERS THAT WERE SCREENED USING ENVIRONMENTAL CRITERIA - Not available G4-EN33: SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE ENVIRONMENTAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN - Not available Aspect: Environmental Grievance Mechanisms G4-EN34: NUMBER OF GRIEVANCES ABOUT ENVIRONMENTAL IMPACTS FILED, ADDRESSED, AND RESOLVED THROUGH FORMAL GRIEVANCE MECHANISMS - Not available
--	---

Principle 9 Encourage the development and diffusion of environmentally friendly technologies	GRI Disclosures to report actions taken to implement Principle 9 and outcomes from implementing Principle 9 Indicators Environmental: Aspect Energy G4-EN6: REDUCTION OF ENERGY CONSUMPTION - SR: Eco-responsibility – energy and climate page 13 https://www.mtn.com/Sustainability/Ecoresponsibility/Pages/energymanagement.aspx https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN G4-EN7: REDUCTIONS IN ENERGY REQUIREMENTS OF PRODUCTS AND SERVICES - SR: Eco-responsibility – energy and climate page 13 https://www.mtn.com/Sustainability/Ecoresponsibility/Pages/energymanagement.aspx https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN
---	--

Aspect: Emissions

G4-EN19: REDUCTION OF GREENHOUSE GAS (GHG) EMISSIONS

- SR: Eco-responsibility – energy and climate (page 13)
- IR: MTN's value creation (page 25)
- <https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN>

Aspect: Products and Services

G4-EN27: EXTENT OF IMPACT MITIGATION OF ENVIRONMENTAL IMPACTS OF PRODUCTS AND SERVICES

- 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 (page 9)

Aspect: Overall

G4-EN31: TOTAL ENVIRONMENTAL PROTECTION EXPENDITURES AND INVESTMENTS BY TYPE

- SR: Eco-responsibility – environmental management (pages 12)
- https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2013.pdf
- https://www.mtn.com/Sustainability/Documents/Mobile_and_Health_2013.pdf

ANTI-CORRUPTION

Principle 10
Businesses should work against corruption in all its forms, including extortion and bribery

GRI Disclosures to report actions taken to implement Principle 10 and outcomes from Implementing Principle 10

General Standard Disclosures

Ethics and Integrity

G4-56

a. Describe the organization's values, principles, standards and norms of behaviour such as codes of conduct and codes of ethics.

- <https://www.mtn.com/MTNGROUP/About/Pages/EthicsGovernanceManagement.aspx>
- <https://www.mtn.com/MTNGROUP/About/Pages/CodeofEthics.aspx>
- <https://www.mtn.com/MTNGROUP/About/Pages/ResponsibilityEthicsGovernanceManagement.aspx>
- IR: Social and Ethics report (page 62)

G4-57

a. Report the internal and external mechanisms for seeking advice on ethical and lawful behavior, and matters related to organizational integrity, such as helplines or advice lines.

- An internal ethics discussion platform exists on the MTN intranet, "MTNConnect"
- A closed group discussion platform exists on the intranet ("MTN Connect") specifically for use by ethics champions at Group and Opco level
- An ethics advice line (not anonymous) exists: MTNGroupEthics@mtn.com
- An anonymous fraud reporting line exists (anonymous@tip-offs.net)
- At organisational level MTN has a strategic partnership with the Ethics Institute of South Africa with whom the company has organisational membership; this partnership is crucial for ethics advice required at a systemic level.
- 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.
- The MTN Group has 5 certified Ethics Officers (registered with the Ethics Institute of South Africa) from the disciplines of 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.
- 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.
- An Issue Management Council exists at head office as well as in most Opcos.

G4-58

a. Report the internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms or hotlines.

- All Ethics related policies indicate the appropriate route to follow with regard to 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 whistleblowing line (Tip-offs Anonymous (anonymous@tip-offs.net)).
- An ethics advice line exists on the intranet (MTNConnect) – a social platform where employees may raise issues for purposes of gaining advice.
- A dedicated mailbox (MTNGroupEthics@mtn.com) is in use for all staff to raise issues of concern or ask advice privately.

Indicators

Society

Aspect Anti-Corruption

G4-SO3: TOTAL NUMBER AND PERCENTAGE OF OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION AND THE SIGNIFICANT RISKS IDENTIFIED

- IR: How we are governed – risk management (page 58-61)
- IR: Our top risks and what we are doing about them (pages 24-25)

G4-SO4: COMMUNICATION AND TRAINING ON ANTI-CORRUPTION POLICIES AND PROCEDURES

- IR: How we are governed – risk management (page 58-61)
- IR: Our top risks and what we are doing about them (pages 24-25)
- IR: How we are governed – social and ethics report (page 66)

G4-SO5: CONFIRMED INCIDENTS OF CORRUPTION AND ACTIONS TAKEN

- Not disclosed

Aspect Public Policy

G4-SO6: TOTAL VALUE OF POLITICAL CONTRIBUTIONS BY COUNTRY AND RECIPIENT/BENEFICIARY

- No political party contributions were made by the management company in 2015.
-



everywhere you go