



MTN Group Limited

**United Nations Global Compact
Annual Communication of Progress (COP)**
for the year ended 31 December 2017





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 MTN

Who we are

MTN is a pure-play emerging markets mobile telco operator at the forefront of technological and digital changes. From our headquarters in Johannesburg and guided by our values, we are delivering a bold, new digital world to our 217 million customers across Africa and the Middle East – one of the world's fastest growing regions for mobile telecommunications.

Established in South Africa at the dawn of democracy as a leader in transformation, we have grown rapidly by investing in advanced communication infrastructure and by harnessing the talent of our people. We now offer voice, data and digital services to retail customers in the 22 countries in which our operations have telecoms licences. We also offer enterprise solutions to corporate and public-sector customers in a total of 24 countries. Our brand is among the most admired brands in Africa as well as among the most valuable African brands.

With a market capitalisation of R257 billion at the end of 2017 we were the ninth largest company listed on the Johannesburg Stock Exchange.

Our belief

Everyone deserves the benefits of a modern connected life.

Our vision

To lead the delivery of a bold, new digital world to our customers.

Our purpose

To make our customers' lives a whole lot brighter.



What we offer

Our market segments

We provide a wide range of communication services to customers across our footprint, and manage the business by market segment: consumer, enterprise and wholesale.

Consumer

We connect people and communities through voice, messaging and data-access services; we enable people to make financial transactions using their mobiles and bring them entertainment and online platforms, apps and online ventures through lifestyle, mobile financial services and e-commerce offerings.

Enterprise

As a committed partner to small, medium and large private enterprises and the public sector, we drive agility and growth through connectivity, communication and collaboration solutions over world-class infrastructure. This includes unified communication (voice, messaging and video), cloud and hosting services, connectivity, managed mobility (the Internet of Things) and security.

Wholesale

MTNGlobalConnect offers wholesale international voice, interconnect and roaming services to group operations and other telcos, leveraging our extensive international and domestic fixed infrastructure across Africa and the Middle East. Markets included for Wholesale are the 24 countries with MTN footprint in Middle East and Africa (including South Africa, Nigeria and Iran).

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MTN Group Limited Statement of recommitment to the UNGC



Our Commitment to the UN Global Compact

The MTN Group is pleased to confirm its commitment to the United Nations Global Compact (UNGC) and its Ten Principles on human rights, labour, environment and anti-corruption.

MTN was formed at the same time as the democratic Republic of South Africa. Those beginnings and the values of all South Africans at that time remain central to the way in which we do business. As a multinational company we are acutely aware of the global challenges affecting the countries where we operate: conflicts have intensified and new threats are emerging; we note global anxiety about nuclear weapons; delays in responding to climate change; inequalities have increased; human rights violations are still occurring, and racism and xenophobia remain very troubling.

It is within this context that we believe business has a crucial contribution to make towards a better world – a world in which, for us, connectivity has become a fundamental need. Our core belief is that everyone deserves the benefit of a modern connected life. We therefore strive for the democratisation of communication through affordable services to our customers in the 22 countries across Africa and the Middle East where we operate.

Our vision is to lead the delivery of a bold, new digital world to our customers, with a purpose to make our customers' lives a whole lot brighter, amid the growing challenges the world is facing.

As we fulfil our vision, we commit to continue making the Global Compact and its principles part of our strategy, our culture and the day to day operations of our company. We further commit ourselves to continue to advance the Sustainable Development Goals as we strive to create not only business value but also social value in the countries where we operate. We look forward to continued collaboration with the UN Global Compact and promoting the Ten Principles in the coming years.

Rob Shuter

GROUP PRESIDENT AND CEO
MTN GROUP

Our market context

The environment in which we operate has direct implications for our ability to create value, informing our strategy and our investment case. By considering our market context, we are better able to determine our material matters and how best to respond to them.

Political and economic environment

- Prolonged war and conflicts impact Syria, Yemen, Afghanistan and South Sudan.
- Elections planned for 2019 in South Africa and Nigeria.
- Iran remains in focus because of the threat of sanctions from the new US Administration.
- Across our footprint, government and regulatory interventions are increasing, but governments are focused on increasing connectivity and digitising societies.
- Global economic growth picking up, but with strong divergence between countries.
- Africa forecast to be world's second fastest growth region to 2020.
- Currency volatility across our main markets.
- Inflationary pressure in Nigeria, Ghana and Iran.
- Growing income and purchasing power in our markets.
- Economies becoming increasingly formalised, improving ease of operation.

Social context

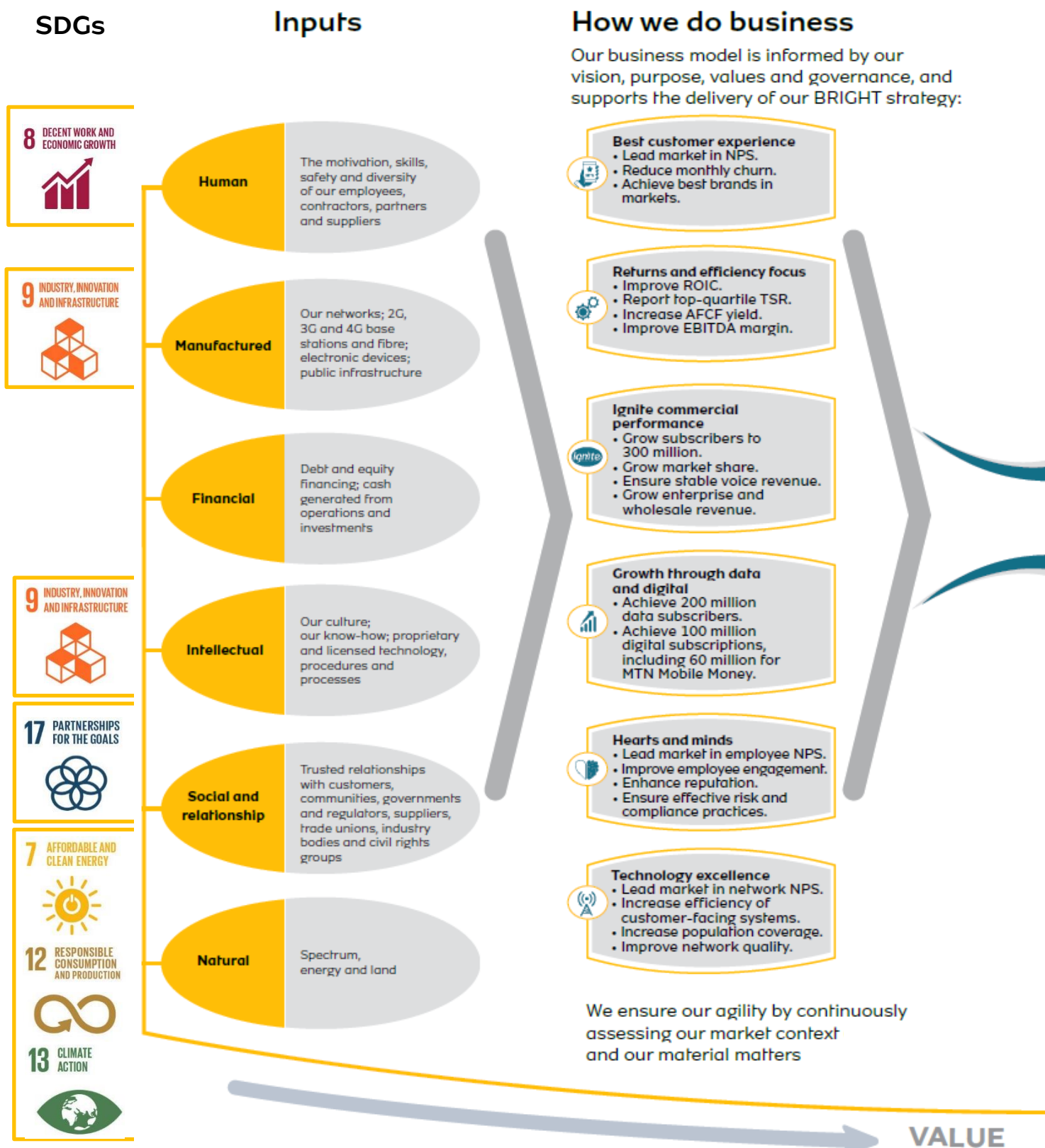
- We have a young and growing population across our markets.
- Africa is urbanising faster than any other region.
- Unemployment remains high.
- Financial inclusion will be key to unlocking consumption.

Technology environment

- We are faced with low internet adoption.
- Digital connectivity is expected to increase fourfold, with broadband penetration growing from 21% in 2015 to 80% in 2020.
- Exponential data traffic growth is expected.
- Mobile Money ecosystems have been established in Ghana, Uganda, Rwanda, Benin and Ivory Coast.
- 3G and 4G network expansion across all markets.

How we create value

We create value by developing and distributing a range of innovative and reliable communication products and services. To do this, we depend on various resources and relationships, known as the six capitals. The way in which we give effect to these, supports the Sustainable Development Goals (SDGs) listed here.



We require inputs from each of the six capitals to deliver on our strategy, advance some of the SDGs, and generate value for all stakeholders. When making decisions on allocating capital, we consider trade-offs between the capitals, and seek to maximise positive outcomes and curb negative impacts.

Outputs

A range of consumer, enterprise and wholesale solutions including voice and data access; lifestyle, mobile financial services, entertainment and e-commerce offerings; and business connectivity and communication solutions

2 006 248 tonnes of greenhouse gas emissions[#]

Outcomes in 2017

18 931 employment opportunities in 24 countries

R9,0 billion paid in **wages and salaries**

Rolled out **3 663 2G, 8 583 3G** and **8 611 LTE sites**

EBITDA of R47,0 billion**

Declared **total dividend** of 700 cents per share

R31,5 billion** in **capital expenditure**

Paid R27,9 billion (R) in total **tax contributions**

Paid R367 million in **regulatory fees**

Avoided 1 529 tonnes of **GHG emissions**

Spent R172 million (R) in **social investment**

Improved **employee culture**

Improved **NPS** in most markets

MTN South Africa BEE contributor status at **level 4**[^]

[#] Defined as an output by the IIRC.

[^] Under amended codes, which have significantly higher recognition levels.

CREATION

How we sustain value using the six capitals

	Key capital inputs			Outcomes of our activities		
Human capital		2017	2016		2017	2016
	Number of employees	15 901	15 980	Staff costs (R billion)	9,0	9,2
	Number of contractors	3 030	4 009	Voluntary staff turnover (%)	7,0	7,2
	Gender split (men:women)	63:37	63:37	Mean employee culture survey (%) ^(A)	70	67
	Investment in employee training (R million)	252	392	Number of training courses completed	31 118	25 376
	Number of nationalities employed	63	60	Opcos with Global Investor in People accreditation (see page 81 for details)	17	16
Manufactured capital		2017	2016		2017	2016
	Value of property, plant and equipment (R billion)	91,8**	95,6**	2G sites rolled out	3 663	2 450
	Capital expenditure (R billion)	31,5**	35,3**	3G sites rolled out	8 583	8 201
	Number of smartphones on our networks (000)	88 506	82 361	4G sites rolled out	8 611	7 676
	• Offices and networks in 24 countries.			Kilometres of fibre rolled out	4 364	5 481
	• Access to public infrastructure.			Depreciation (R billion)	19,3**	21,0**
				Impairment of assets (R billion)	3,0**	0,2**
Financial capital		2017	2016		2017	2016
	Market capitalisation (R billion) at year-end	257	238	EBITDA (R billion)	47,0**	40,8**
	Interest received (R billion)	3,5**	4,4**	Profit/(loss) after tax (R billion)	4,5**	(3,1)**
	Net debt (R billion)	57,1**	51,9**	Cash generated through operations (R billion)	38,5**	55,7**
				Net debt to EBITDA ratio^	1,22	1,27
				Net interest paid (R billion)	3,9**	3,7**
				Basic headline earnings/(loss) per share (cents)	182	(77)**
Intellectual capital	• Our strong and established brand.				2017	2016
	• Our skilled and experienced employees.			Goodwill and intangible assets (R billion)	38,3**	46,5**
	• Our partnerships and joint ventures.			• MTN South Africa named most valuable brand in the country (Brand South Africa).		
	• More than 20 years' experience of operating in challenging emerging markets.			• Introduced standardised CVM platforms across 18 opcos.		
Natural capital	• Radio spectrum in the 700, 800, 900, 1 800, 2 100, 2 300, 2 600MHz bands.				2017	2016
		2017	2016	Carbon emissions (tonnes of CO ₂ equivalent) ^o	2 006 248	1 609 704
	Gigajoules of energy used	19 095 879	13 514 716	GHG emissions avoided (tonnes)	1 529	833
				Number of new alternative energy sites*	459	1 001
Social and relationship capital	• Constructive relationships with regulators, customers, trade unions, employees, communities, civil society.				2017	2016
	• Ongoing interactions with government and tax authorities.			Total tax contributions ^(A) (R billion)	27,9	33,5 [†]
	• Regular engagement with shareholders and the investor community on MTN's plans and performance.			CSI spend ^(A) (R million)	172	295,4
				BBBEE status in South Africa [†]	Level 4 (102.65 points)	Level 2 (87.83 points)
				Number of calls to whistle-blower line ^(A)	119	120
				MTN Mobile Money active subscribers (million)	21,8	15,4
				NPS South Africa (%) ^(A)	70	81
			NPS Nigeria (%) ^(A)	26	30	
			NPS other key markets (%) ^(A)	35	25	

** Reported – as reflected in the MTN Group Limited financial results for the year ended 31 December 2017.

[^] Excluding the Nigerian regulatory fine.

[†] Under amended ICT Sector Codes. Level 2 achieved in 2016 is now equivalent to Level 6 under new framework.

How we achieved these	The trade-offs
• Refreshed our management team. • Invested in targeted training and development. • Adjusted regional responsibilities. • Encouraged diversity, so workforce understands the needs of our subscribers.	Employees in 15 of our 22 operating companies and in Manco received bonuses for 2017 as these operations met their financial targets. This positively affected human capital. By outsourcing some functions MTN reduced its stock of human capital to the benefit of intellectual and financial capital.
• Focused our capital investment on rolling out new 3G and 4G base stations, data and switching centres and dedicated fibre.	By expanding our networks, we increase the stock of manufactured capital and reduce our stock of financial capital in the short term. However, ultimately this investment should boost our business and therefore our stock of financial capital in the longer term. By advancing manufactured capital, we negatively impact natural capital. However, by sharing infrastructure and increasing the efficiency of existing infrastructure we are able to mitigate our impact on the stock of natural capital.
• Accessed the domestic markets for funding; raised R5,3 billion through the Domestic Medium Term Programme. • Continued to maintain and improve on our group liquidity levels. • Concluded local currency funding in some key markets including 510 million cedi facility for MTN Ghana. • Repatriated R6,5 billion in cash from our Iran operation. • Declared total dividend of 700 cents per share.	By applying financial capital, we are able to grow our business, positively impacting manufactured, human and intellectual capital, as well as social and relationship capital. However, through our use of financial capital to build new telecoms infrastructure we may negatively impact the stocks of natural capital.
• Refreshed our brand. • Hired specialist skills in customer value management (CVM). • Partnering with experts in various fields, such as technology and management consultancy. • Creating and maintaining joint ventures and partnerships to expand new revenue streams.	In the short term, our investment in intellectual capital reduces our stocks of financial capital while boosting in the longer term the stocks of human, financial and social and relationship capital.
• Secured spectrum in Sudan and Syria in 2017. • Ensured resilience to change in climate or increase in extreme weather events on critical infrastructure through business continuity processes. • Continued to invest in efficiencies to ensure our technical infrastructure supports service delivery using the least possible amount of energy.	The short-term input to securing sufficient spectrum is financial capital. By establishing and maintaining an extensive high-quality network and increasingly rolling out 4G sites, our energy consumption for broadband and data services continues to grow. By remaining largely reliant on non-renewable resources, we negatively impact natural capital. However, through infrastructure sharing, the commitment of our tower management partners to prioritise energy efficiency, along with our own efforts and investments in low-carbon power, we are working to mitigate the overall impact on this stock of capital.
• Enhanced management structure to support regulatory compliance and revised key ethics structures and policies. • Monitored staff morale through annual culture survey. • Extended MTN Mobile Money services to more people. • Increased number of certified ethics officers to 27. • Elevated regulatory function to executive committee. • MTN South Africa made notable improvements in transformation drive. • Progressed plans for MTN Nigeria and MTN Ghana listings. • Reduced effective data rates by 31% and voice rates by 20%.	Investment in social and relationship capital reduces our financial capital in the short term. However, by helping to close the digital divide and transform society through our various skills and enterprise development, preferential procurement and localisation initiatives we ultimately build the stocks of social, human, intellectual and financial capital.

♦ Higher scope 3 emissions due to more outsourced sites accounted for by MTN than by tower companies.

▲ 2016 number revised upwards after reconciliation of alternative energy investments.

△ Although actual NPS is lower than prior year, NPS improved relative to nearest competitor.

† Updated with Botswana number and apportionment of Swaziland numbers.

Scope of the COP

The MTN Group has been a signatory to the United Nations Global Compact since December 2012, and this communication of progress marks the fifth year of our UNGC COP reporting. This is also the Group's eighth year of sustainability reporting. It provides more detailed information to our stakeholders regarding our actions to support the Ten Principles of the UNGC in the areas of Human Rights, Labour, Environment and Anti-Corruption.

This communication of progress covers our operations in Afghanistan, Benin, Cameroon, Congo-Brazzaville, Cyprus, Guinea-Bissau, Guinea-Conakry, Ghana, Iran, Ivory Coast, Liberia, Nigeria, Rwanda, South Africa, Sudan, South Sudan, Swaziland, Syria, Uganda, Yemen and Zambia, as well as MTN Enterprise operations in Kenya and Namibia. Owing to indirect ownership holding, Mascom Botswana is excluded from reporting. MTN Yemen and MTN Syria have been excluded for CDP reporting due to challenges associated with network management in the macro political context. Some Group head office services are undertaken in the UAE, Dubai, in leased offices and are hence considered immaterial for CDP reporting.

This Communication of Progress also reports on MTN's support for the following Sustainable Development Goals.



Internally we have commenced discussions to interpret the UN SDGs for our business, and to deliberate how we could use our resources to help bring about change. While this process is still at inception phase, we have identified a number of our activities that support the SDGs and we are integrating this in our project activities where possible. In this regard we view the cultivation of partnerships as crucial to fast-track the change needed to achieve meaningful outcomes in the markets in which we operate. For an exploration of how we contribute to various SDGs, please refer to the table on the pages that follow.

How we contribute to the Sustainable Development Goals

In this section of our report we articulate the basis for our support to the Sustainable Development Goals, as well as the specific ways in which we have been expressing such support in the various countries where we operate.

SDG, description and nature of MTN's actions, SDG partnerships and contribution

	No poverty “End poverty in all its forms everywhere”
MTN's actions, SDG partnerships and contribution	Only 18% of African households have internet access compared to 53,6% on average globally (International Telecommunications Union, 2017). Keeping in mind the needs of the various market segments we serve, including the poor, the unbanked and the underbanked community, we are dedicated to improving mobile connectivity, accessibility and affordability with a range of solutions. Some of these are described below: ✓ Mobile Money platform for social welfare grant payments: MTN's Mobile Money platform facilitates payment of social welfare grants for orphaned and vulnerable children and allowances to the elderly in Swaziland. ✓ Solutions to reduce risks for vulnerable households: MTN and aYo offer two solutions to reduce risks for vulnerable households. 'Recharge with Care' offers subscribers the option of free hospital or life cover, which increases the more subscribers recharge their airtime packages. Subscribers can also boost their cover by purchasing additional cover using their airtime and available MTN Mobile Money balances. 'Send with Care' enables subscribers to ensure their immediate families can receive full life and accident hospitalisation cover to the value of three times the remittance amount, for a period of 120 days. Focus group and interview study results indicate that customers appreciate these solutions, and testimonials reveal the positive difference it has made when people were compelled to use cover for example, to meet their hospitalisation requirements. ✓ Mobile money lending: via MTN Mobile Money is available in Uganda and Zambia, and pilots are planned for other countries. ✓ MTN Mobile Money and NSSF contributions: In Uganda, MTN and the National Social Security Fund (NSSF) have begun partnering to ensure individuals, small and medium entities can now pay their NSSF contributions using MTN Mobile Money. This offers a way for people to save for their retirement needs conveniently. ✓ Free funeral assistance: MTN Swaziland and Old Mutual Insurance offer MTN Mobile Money customers free funeral assistance.

2 ZERO HUNGER



Zero hunger

"End hunger, achieve food security and improved nutrition and promote sustainable agriculture"

MTN's actions, SDG partnerships and contribution

- ✓ **Feeding vulnerable children:** The MTN Foundation of MTN Nigeria has partnered with the Feed for Life Foundation to fight against child hunger. Since inception, the Feed for Life foundation has fed over 10,000 children. In December 2017 the foundation fed 3000 children and old women at the Makoko Slum, Lagos State.
- ✓ **MTN mobile money and feeding scheme disbursements:** In Guinea-Bissau, the World Food Programme's feeding scheme disbursements to beneficiaries is facilitated by MTN Mobile Money.

3 GOOD HEALTH AND WELL-BEING



Good health and well-being

"Ensure healthy lives and promote well-being for all at all ages"

MTN's actions, SDG partnerships and contribution

- Through their health portfolios, all the MTN Foundations promote sustainable, healthy lifestyles in communities through school and community-based initiatives targeting TB, lifestyle diseases and HIV and AIDS. Our Foundations undertake these interventions in partnership with different organisations, promoting programmes that support disease prevention, early detection, as well as treatment, care and support for needy communities:
- ✓ **MHealth:** MTN's health and well-being solutions include *mHealth* services through which we connect individuals to healthcare services and to the information they need, when they need it.
 - ✓ **Healthcare access:** We look for ways to provide the most vulnerable and needy in society with access to healthcare. The interventions that we are a part of range from arranging free cataract operations to providing access to basic medical support through mobile clinics.
 - ✓ **ART app (South Africa):** The MTN SA Foundation funded the testing and development of an antiretroviral therapy app. It provides real-time, immediate feedback and guidance for clinicians to initiate treatment.
 - ✓ **e-Health programme (South Africa):** We are setting up ICT laboratories in nursing colleges across South Africa to assist the Department of Health in the training of nurses.
 - ✓ **SMS Printer for Life (Cameroon):** The MTN Cameroon Foundation and the Clinton Health Access Initiative developed portable SMS-connected printers for specialist labs to SMS infants' HIV results to remote clinics (which previously took months to courier). Mothers are now seeing their children benefit from early infant diagnosis through antiretroviral therapy initiated at the right time.



Quality education

“Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all”

MTN's actions, SDG partnerships and contribution

Improving communities' access to education and helping young people become economically active is a top corporate social investment priority for us. Harnessing our core ICT capabilities, we have developed education programmes that bridge the digital divide and change lives for the better:

- ✓ **Curriculum digitisation (South Africa):** MTN SA Foundation partners with SA's National Department of Basic Education in converting language manuals into digitised and interactive content.
- ✓ **Digital Generation (Ivory Coast):** The MTN Ivory Coast Foundation has built over 70 multimedia rooms in schools and universities across the country to improve access to digital education.
- ✓ **ICT Skill Up (Nigeria):** The MTN Nigeria Foundation and Oracle are providing thousands of MTN Foundation Scholarship beneficiaries with online training in Java Fundamental and Oracle Database.
- ✓ **ICT Teachers (Cameroon):** The MTN Cameroon Foundation partners with government in acknowledging the successful integration of ICT into classrooms, awarding pro-tech teachers with laptops, modems and free data.
- ✓ **MTN READ (Cyprus):** MTN Cyprus offers school students across the country free access to a library of digitised books via the MTN READ app.
- ✓ **Primary school ICT clubs (Uganda):** The MTN Uganda Foundation and Makerere University establish and equip ICT clubs in primary schools across the country, training learners and teachers, and offering ICT scholarships to patrons.
- ✓ **School connectivity (South Africa):** The MTN SA Foundation builds and equips computer laboratories for schools in rural and disadvantaged communities. The labs include PCs, an interactive whiteboard, data projector and multifunctional printer as well as internet connectivity, and broadcast equipment for live lessons (courtesy of NGO Mindset Network).



Gender equality

“Achieve gender equality and empower all women and girls”

MTN's actions, SDG partnerships and contribution

MTN is wholly committed to the articles of the *Convention on the Elimination of all forms of Discrimination against Women*, as well as to the *Women's Empowerment Principles* of the United Nations Global Compact. Giving effect to this commitment has led to the following results:

- ✓ **Gender study:** A study to determine how to attract, retain and develop female talent at MTN, and to ensure the workplace is more gender-friendly, was undertaken in 2017. The results informed a decision by the group executive to make our workplace more conducive for women, and to fast-track gender representation at various organisational levels. Quick wins to improve the working environment, such as designated

services for pregnant and new mothers, have been identified. At this initial stage the programme is focused on the MTN Group head office and MTN South Africa operations, and will be rolled out to the rest of our operations over time.

- ✓ **Advancing female market agents:** Lonestar Cell MTN in Liberia launched a campaign supporting female market agents, most of whom do not have access to banks, and may therefore face additional hurdles in transacting, saving and remitting funds. The aim of this campaign is to empower females, who are often the breadwinners, by enabling their financial inclusion and supporting educational requirements. By completing a minimum of 20 transactions monthly valued at LRD1 500 (approximately R137), and submitting proof of previous educational fee payment for one of their dependants, agents qualify for educational assistance to the value of LRD2 000 (approximately R183). Female agents are also incentivised to recruit other female merchants, with a payment of approximately R60.
- ✓ **Assisting women in business transition:** MTN Rwanda, together with the International Trade Centre (ITC), launched SheTrades, aimed at contributing to gender equality and assisting women in business transition from small-scale trading to large-scale enterprises. A certified education programme and mobile application, to which MTN contributes browsing and downloads free of charge, enables female entrepreneurs to obtain easy access to knowledge-sharing opportunities, customers, investors, and suppliers, and to connect with other female entrepreneurs.
- ✓ **Digital connectivity and affordable access:** We have ensured digital connectivity and affordable access to tailored solutions for SMEs, including female-owned enterprises.
- ✓ **Other special projects aimed at women employees:**
 - 16 Days of Activism Against Women and Children Abuse annually from 25 November to 10 December.
 - The annual MTN Women's Day celebrations that include various programmes aimed at inspiring our women and discuss the particular challenges they face in the various domains of their lives.

7 AFFORDABLE AND CLEAN ENERGY



Affordable and clean energy

“Ensure access to affordable, reliable, sustainable and modern energy for all”

MTN's actions, SDG partnerships and contribution

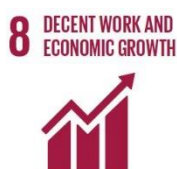
Powering communications is MTN's solution to the challenge of energy access, affordability and reliability in many of our markets. This issue hampers the inclusivity of digital communications and the widespread growth of digital connectivity services. Access to prepaid solar mobile services ensures affordable device charging solutions to those with limited access to power sources. These initiatives are largely in support of our retail and small enterprise customers, community service organisations such as healthcare facilities and schools, and MTN Mobile Money agents.

Solar power is highly cost-competitive with other energy sources. In Nigeria, for example, the cost of charging is approximately NGN50 per day (approximately ZAR5,00), compared to an average cost of NGN1 600 per day

(based on eight hours a day) or ZAR53,33 a day for other sources of energy. MTN's efforts on affordable and clean energy are described below:

- ✓ **Solar charging solutions:** At present MTN provides energy access, affordability and reliability to more than 1,3 million people benefitting from MTN's solar charging solutions.
- ✓ **Pay-as-you-go or prepaid mobile solar energy systems:** MTN is assisting home users and micro-enterprises to overcome afford-able energy challenges through the provision of pay-as-you-go or prepaid mobile solar energy systems. This involves a basic lease-to-own solar microgrid solution, with capacity starting from 10 watts. Customers can extend their products by purchasing additional solar panels and selecting from a range of electronic and electrical devices and accessories. Some solutions may charge TVs so that users can access on-demand content such as educational programmes.
- ✓ **MTN's solar-in-a-box solution:** Home users typically require prepaid solar solutions for lighting, cell-phone and computer charging, and for charging radios and televisions. Small businesses also benefit from these products. In addition to charging these devices for customers for a fee, MTN's solar-in-a-box solution offers additional revenue streams to entrepreneurs such as from haircuts and shaving services using the shaving accessory, and access to MTN Mobile Money services. Entrepreneurs also use this to power their own businesses, enabling them to trade for longer hours during the evening. Healthcare facilities, community centres and schools are also keen users of our prepaid solar mobile solutions.

MTN's prepaid solar mobile energy systems replace dangerous, noisy and polluting systems with clean, renewable solar energy. Anecdotal feedback from some of our customers indicated their relief at being able to replace kerosene and candles for some of their energy requirements, especially for their children's need for lighting during study periods.



Decent work and economic growth

"Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all"

MTN's actions,
SDG
partnerships
and contribution

- ✓ **MTN's Global Graduate Development Programme:** The programme seeks to accelerate top graduates we recruit from across MTN's footprint in Africa and the Middle-East. The programme offers experiences that fast-track talented individuals into critical roles at MTN. It combines formal development in partnership with Duke Corporate Education and the MTN Academy, as well as on-the-job development through full employment and placement into a strategically aligned role. The formal component includes modules at MTN's 3 Regional Learning Centres, located in Southern, Northern and Western Africa. These include blended learning such as metaphoric immersive experiences, multiple digital and media channels, and connection to social media platforms. On-the-job development takes place locally where graduates are employed in MTN's opcos, and through job rotation which includes in-role experience, varied interactions with the executive committees, mentoring, and coaching.
- ✓ **Skills development for SMEs:** Enabling economic self-sufficiency is fundamental to our enterprise development interventions. We help to

develop entrepreneurs and small businesses through skills development and funding such as the Dreams Development workshops (MTN South Africa). The MTN SA Foundation partners with the Dreams Development Programme in building the growth capabilities of SMEs through workshops.

- ✓ **mLab (South Africa):** Together with Creative Space Media, the MTN SA Foundation supports previously disadvantaged app developers in creating socially conscious apps under the mentorship of mLab.
- ✓ **Technology as an enabler for SMEs:** As a key customer segment for MTN, SMEs are the next generation of digital businesses, and can spur economic growth in our markets. We focus on helping entrepreneurs take their business to the next level, using technology as an enabler to achieve operational efficiency, management and cost control. We focus on four types of SMEs, namely the SoHo market (small home office), microenterprises, small enterprises and emerging enterprises, all of whom have different needs and commercial behaviour patterns. By specifically focusing on context and needs-based solutions designed to meet the affordability, connectivity, efficiency and management needs of these customers, we can help these businesses thrive in challenging environments, compete with larger businesses and contribute to national outputs and income and job creation. Our initiatives in this regard are focused on network solutions for small businesses, capacity building, supporting start-up organisations and income-generating opportunities including for women, youth and our own customers.
- ✓ **Small and Microenterprises Promotion Services (SMEPS) (MTN Yemen):** This initiative is an important contributor to the national SMEPS programme focused on economic growth. One of the programmes is the 'Make your Qamaria by yourself' campaign, aimed at reviving Yemen's tradition of developing products that are consistent with international standards. Sales channels now promote products and generate income for craft producing families, empowering low-income craft makers, including female-operated enterprises.
- ✓ **Youth empowerment through Bus Shelter Kiosks (MTN Nigeria):** As part of our drive to grow youth engagement and empowerment, MTN Nigeria partnered with Lagos state government to launch the Bus Shelter Kiosk initiative. The partnership deal will construct approximately 50 bus shelters equipped with MTN retail kiosks, which will be managed by young people. In addition to empowering youth, the bus shelter kiosks offer MTN customers the opportunity to conveniently access services to resolve their queries.
- ✓ **Addressing youth unemployment:** In partnership with the Federal government, we also launched the N-Power Volunteer Project, which addresses the challenges of youth unemployment and weak industries. This project is part of the government's direct job creation and social inclusion initiative to address unemployment by recruiting 500,000 volunteers, who are trained and provided with relevant skills to start businesses or help improve aspects of public services. MTN supports this programme through the distribution of cellular devices from our service centres and providing data to volunteers. Devices are preloaded with content on agriculture, health, education and technology.



Industry, innovation and infrastructure

“Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation”

MTN's actions, SDG partnerships and contribution

In 2017 we spent time implementing trials for four types of IoT solutions across our operating countries. Our goal is to widely deploy solutions such as fleet management tracking, smart meters for water and other utilities, Connected Wildlife, and smart refrigeration on a commercial scale once network foundations have been laid. MTN's IoT products are examples of solutions that can vastly change the way industries and businesses operate and serve their customers.

- ✓ **Infrastructure roll out to enable IoT uptake:** With the potential of IoT to contribute to several UN SDGs, we have recognised the need for a stronger ecosystem to support the growth of IoT in our operating countries. We are working to increase the rollout of infrastructure that will enable the uptake of IoT by industries and enterprises across our operations in Africa and the Middle East.
- ✓ **Accelerating the development of IoT in emerging markets:** We are also piloting Narrow Band-IoT (NB-IoT) technologies, a new solution that extends the utilisation of IoT by making it more efficient to connect objects that require a long battery life and that are in areas where network signals may have difficulty penetrating. Co-operating with partners to build IoT ecosystems will help us accelerate the development of IoT in our markets.
- ✓ **Mobile financial services:** GSMA studies indicate the demand for access to financial services is so significant because there are more registered mobile money accounts in sub-Saharan Africa than bank accounts. With Africa striving towards operating as a cashless society, MTN aims to be the largest provider of mobile financial services in Africa. Mobile financial services are digital solutions for receiving payment and purchasing products, transferring money, transacting with governments, businesses and peers, and enabling savings and access to credit and insurance services using mobile handsets. MTN Mobile Money and financial services are available in 14 countries.
- ✓ **MTN Mobile Money** provides users with a simple, safe and inexpensive means of transferring and saving money and allows convenient payment services. This includes ensuring people can pay school and university fees, buy airline, rail and public transport tickets, purchase fuel and pay for taxi services, enjoy access to social security, settle utility, parking and other bills and transfer money locally and internationally. Our products also include savings, micro-loan and micro-insurance services. In some countries, subscribers can also use MTN's zero-rated Mobile Money application (app) for more convenient transactions without the need to dial a long set of digits to access various services. Security is assured through the app's ISO 27001:2013 certification.
- ✓ **Mobile Money saving, earning interest and obtaining short-term financing:** In Rwanda we worked with the Commercial Bank of Africa to launch MoKash, enabling Mobile Money users to save, earn interest and obtain short-term financing. As in other countries, an agreement

between MTN Rwanda and Canal+ now also allows customers to pay for their satellite television subscriptions using MTN Mobile Money.

✓ **Easy access to services used by motorists:**

- We have recently entered into an agreement with the Kigali Veterans Cooperatives Society, which is responsible for the collection of parking fees in Kigali, to enable acceptance of instant mobile money payments, ensuring convenience and ease of access to services used by motorists.
- Taxi Moto customers can now also pay their fares following an agreement between MTN and Yego Moto.

✓ **Push and pull money services:** Our partnerships with Cogebanque and with Amasezerano Community Bank now enables our customers in Rwanda to deposit and withdraw money using MTN's push (to transfer) and pull (to withdraw) service, from ATMs and their MTN Mobile Money wallets.

✓ **Tap-and-go payments from customer handsets:** MoMoPay was launched in Benin, Cameroon, Ghana, Ivory Coast, Rwanda, Uganda and Zambia. This tap-and-go service allows pharmacies, petrol stations, travel companies and transport services to accept payments for their goods and services from customer handsets, and ensures merchants can pay their suppliers and their employee salaries also using mobile phones. Bank transfers are also facilitated. In Benin, the service is used by Zemidjan motorcycle taxis and urban taxis, for instance, allowing cashless, easy and secure contactless payments for transport services.

✓ **'Bank for Free' partnership:** MTN Zambia has launched a 'Bank for Free' partnership with Stanbic Bank. Stanbic accountholders who are also MTN subscribers can access the online banking portal and Stanbic websites without reducing their available data bundles. This digital connection also improves remote access, reducing the need for people to go into bank branches to transact.

✓ **Mobile cash service in Sudan:** MTN in partnership with the Nile Bank launched a mobile cash service. This will enable users to perform money transfers, purchase electricity and pay bills and government fees using their handsets. Users in Liberia can now pay their taxes using MTN Mobile Money.

✓ **Combatting cattle theft through AIMS:** The launch of MTN Nigeria and Sponge Analytics' *Animal Identification and Management Solution (AIMS)* has seen a small but steady uptake of our solution to the problem of cattle theft that is escalating. AIMS makes it possible for owners of livestock, pets and other animals to identify their animals electronically, by using a radio frequency identification (RFID) scanner to read and pass on information about the animal's unique identification code and owner's profile, after a chip has been injected into the animal. The information is hosted on the AIMS portal. Over 20 000 RFID chips have been sold to dealers and vets. Herders can also send distress signals using an app on their handsets, in the event of an emergency. With the ability to trace animals, ownership details and facilitate disease surveillance and control, this solution can also ensure Nigeria's participation in the beef export market.

✓ **Fleet management solution in Iran:** In Iran, we showcased a fleet management solution which can streamline operations such as public

transportation tracking, fare payments and emergency response. An automated vehicle location feature enables emergency services to assign accidents, fires or electricity outage missions to the nearest response units, and supports situational updates, allowing easy documentation of all the information exchanged along the mission operation. This solution also integrates with automatic fare calculation and cashless fare payment systems for public transport services. Fares can be settled using MTN's Near Field Communication (NFC) enabled SIM cards or other cards.

- ✓ **Fleet tracking in Benin:** Fleet tracking is also currently available in Benin through a partnership agreement between MTN and C-track. The partnership enables MTN's business customers to seamlessly integrate a standard fleet management and vehicle tracking solution into their existing mobile network offering, at an affordable rate. The tracking platform uses MTN's Pan African IoT SIM cards, enabling businesses to benefit from a single rate for IoT activity, and as a result significant cost and accessibility barriers are removed.



Reduced inequalities

"Reduce inequality within and among countries"

MTN's actions, SDG partnerships and contribution

MTN contributes towards connectivity as a fundamental need. We therefore promote the democratisation of communication through affordable services to our customers. Over 66% of people in sub-Saharan Africa do not have access to formal banking and financial services, which includes basic transactions, savings and credit facilities. Numerous studies indicate that simple, affordable and convenient access to financial services improves development outcomes and enables economic growth. MTN Mobile Money and digital financial services are successfully bridging this gap, by providing sustainable, easy, convenient and secure mobile solutions to youth, women, the unbanked and the underbanked community through access to mainstream financial services and products rather than through less favourable forms of finance and micro-finance available to the poor that may lead to exploitation of vulnerable groups.

We also combat inequalities in the SMME sector by promoting entrepreneurship and small business development through our contributions towards the creation of enabling environments that encourage an entrepreneurial culture and the development of small, medium and micro enterprises (SMMEs). We support programmes that encourage self-reliance in individuals and communities. This idea is promoted through programmes that inculcate entrepreneurship among school-going youth, through the establishment of business support centres, and through business mentoring to SMMEs.

- ✓ **Education on democracy:** MTN contributes to education on democracy through the sponsorship of *The Road to Democracy* books developed by the South African Democracy Education Trust (SADET).
- ✓ **21 Days of #YelloCare:** Every year, MTN staff set aside 21 days to volunteer in activities that uplift the communities we operate in. The 21 Days of #YelloCare campaign encourages participation from MTN staff in high-impact social projects within their local communities. We have now

extended the campaign to our customers, allowing everyone to take part in making a difference.

- ✓ **Enabling cross-border transactions:** Foreign remittances remain a significant source of investment and income in many of our markets. With MTN's participation in 28 digital remittance corridors in multiple countries and regional blocs, we leverage our mobile infrastructure and partnerships to enable crossborder transactions. For instance, MTN and EcoCash recently signed an agreement to enable remittances between Zambia and Zimbabwe.
- ✓ **Closing the digital and energy access divide:** MTN's prepaid solar power solutions help close the digital and energy access divide, improve financial inclusion and access to economic and other opportunities, help avoid greenhouse gas emissions and reduce fire and air pollution risks from the use of kerosene and candles. For MTN, such solutions ensure that we meet our objective of deepening digital inclusion. Studies by product vendors and the GSMA indicated that MTN's prepaid solar energy solutions enable small businesses to operate and trade for up to three additional hours per night, and assist children to study for between two and three hours at night as well. Prepaid solar energy generates income, creates jobs, powers clinics and community centres and can reduce the risk of fires and air pollution from other flammable or dangerous fuel sources.
- ✓ **Solar lighting and charging solutions:** It is estimated that there were 147 600 households in 2017 where students used MTN's solution vendor Fenix's ReadyPay prepaid solar lighting and charging solutions system to study at night.
- ✓ **Affordable and efficient connectivity solutions** are critical to our customers, and several innovative and convenient network and internet solutions were offered specifically for small businesses. Our initiatives support our drive to improve access and connectivity. We have focused our efforts on ensuring digital connectivity and affordable access to tailored solutions for SMEs, including female-owned enterprises, support for and capacity building through entrepreneur education, and income-generation opportunities for entrepreneurial MTN subscribers and the youth.
- ✓ **Supporting digital transformation of SMEs:** We launched two initiatives to support the digital transformation of SMEs in Cameroon: MTN ProBox+ is a mobile data solution developed to assist small catering and hospitality businesses take advantage of high speed internet without heavy infrastructure and installation requirements. These businesses can easily create a website to promote temporary events, and offer access to and web backup of existing ADSL and fibre-deployed websites, ensuring better network coverage, faster access and volume benefits. Also in Cameroon, the MTN PME Pack, specifically designed for SMEs, was launched in partnership with APME (Small and Medium Enterprises Promotion Agency), following our partnership agreement in 2016 to connect 20,000 SMEs to ICT services. This solution enables SMEs to access mobile voice, data, SMS, hosting services and financial services.
- ✓ **Assisting small business owners to learn:** In Nigeria, MTN and Tricom Experimental Projects hosted entrepreneurs at a capacity-building workshop, giving small business owners the opportunity to learn from leading business owners and to incorporate feedback into their own

businesses. MTN Cameroon and APME hosted masterclasses to assist entrepreneurs gain brand visibility, increase sales, access new markets and improve their financial, customer and workforce management. A starter ICT kit solution with device, voice, data and web presence solutions at highly competitive rates for the new SMEs was also made available.

- ✓ **Educating entrepreneurs on how technology can assist development and inclusivity:** In Ivory Coast, we conducted a number of SME education initiatives, including our IT Days programme to educate entrepreneurs on how technology can assist development and inclusivity, and a cloud computing workshop, where information on how such solutions can simplify and digitise operations, was presented. In South Africa, MTN and FinFind hosted the *Business Digital Entrepreneur Masterclass*, assisting start-ups and small businesses to understand where to access small business funding.
- ✓ **Young entrepreneur incubators:**
 - MTN Ivory Coast launched the first edition of an incubation programme to assist young entrepreneurs. *Y'ello Startup* is designed to help these entrepreneurs design and deploy innovative digital solutions with a strong impact on the socio-economic environment. Similar programmes were launched in Benin and South Africa.
 - In Benin, the country's first innovation centre is now being used as a start-up incubator aimed at revolutionising digital technology through web and application developer promotion.
 - MTN South Africa launched the *Venture Incubation Programme* to help entrepreneurial teams test and validate their business models.
- ✓ **App Challenge and App of the Year programmes:** MTN's App Challenge and App of the Year programmes champion the development of digital applications that meet local needs in an easy, low cost and innovative manner in some MTN countries, enabling entrepreneurs to grow their businesses. These challenges are designed to uncover digital innovation and identify emerging entrepreneurs from high school students to female-owned enterprises. It also helps entrepreneurs refine their business models and supports the commercialisation of solutions.

11 SUSTAINABLE CITIES AND COMMUNITIES



MTN's actions,
SDG
partnerships and
contribution

Sustainable cities and communities

"Make cities and human settlements inclusive, safe, resilient and sustainable"

- ✓ **Fibre optic network, cloud business telephony and connectivity solutions:** In Cyprus, we recently launched a fibre-optic network that covers all cities as well as rural areas around these cities to provide customers and clients with a more robust internet connection, cloud business telephony and connectivity solutions.
- ✓ **Smart City Programme (Iran):** Phase 1 of Irancell's Smart City Programme will result in the application of intelligent solutions to solid waste management, optimal green space irrigation and the measurement of water in reservoirs. Phase 2 will target other city services including

street lighting, air pollution monitoring, reporting of the availability of parking spots and the use of NFC-enabled payments for services.

- ✓ **Connected Driver solution, South Africa:** In South Africa, trials of MTN's Connected Driver solution designed to monitor and assess driver behaviour, have commenced. This solution uses an onboard diagnostic device that connects a vehicle to a mobile application for personal use, or to a data centre for commercial use by organisations such as insurance companies and fleet management services. It enables monitoring and assessment of driver behaviours such as speed and braking, and can sense driver fatigue, sending warning signals to the driver. Insurance companies and fleet management firms can use data analytics to risk-rate drivers more effectively. They can also offer incentives for better driving, which will reduce accidents and the associated claims.
- ✓ **Smart Refrigerator solution:** MTN's Smart Refrigerator solution is another useful application of IoT, which enables remote monitoring of refrigerators before a power outage occurs, allowing inventory control, monitoring and cold chain management. It also helps to improve quality control in commercial organisations so that the end-product can be served to consumers at the optimal temperature, enabling the bottler or supplier organisation to monitor their products at points of sale.



Responsible consumption and production

"Ensure sustainable consumption and production patterns"

MTN's actions, SDG partnerships and contribution

We are concerned about the waste that electronic and electrical (WEEE) products may generate, along with plastic and other components of the solutions. We are discussing long-term solutions with some of our partners to address this matter.

- ✓ **Extending the useful lives of electronic and electric assets:** Fenix, a solution vendor with whom MTN is in partnership to address the need for access to affordable and clean energy, is already working on solutions which include the repair and refurbishment of old or faulty units to extend the useful lives of assets such as batteries and solar panels, and the refurbishment and recycling of hardware at local service centres.
- ✓ **Managing waste outputs:** Both MTN and our partners are searching for more rigorous recycling programmes and waste handlers with whom environmentally responsible solutions can be implemented. Fenix's ReadyPay is powered by lithium iron phosphate batteries, which have a longer lifespan compared to sealed lead acid batteries. Solar panels are expected to last more than 10 years. ISO 14001 certified disposal companies are contracted to assist with management of ReadyPay waste outputs.

ReadyPay's product development team is also assessing solutions for complete paper-based packaging, and is actively sourcing recyclable plastics and electronics for use in product lines.



MTN's actions, SDG partnerships and contribution

Climate action

"Take urgent action to combat climate change and its impacts"

MTN's most material environmental impact occurs as a result of our reliance on energy to power our communication networks. We therefore actively focus on improving the efficiencies we extract from the use of energy, and we invest in alternative and less carbon-intensive forms of energy to power our operations, improve our resilience and ultimately reduce our impact on the environment and the in communities in which we operate. All our operations seek to move towards more efficient and climate-friendly sources of energy, including switching to hydro-powered grids and alternative energy sources such as solar-powered solutions.

- ✓ **Internal audits to determine our business growth's future impact on emissions:** In 2017, a number of operations undertook internal audits to understand how MTN's investments in our network and business growth plans may be influencing our emissions. Internal assurance assessments also enable us to improve systems and reporting processes. For example, during 2017, MTN Swaziland completed an energy efficiency audit to identify areas with significant losses and improve operating efficiencies.
- ✓ **Internal audit of critical infrastructure in Ivory Coast:** In light of increased outsourcing activities in Ivory Coast, we have undertaken an internal audit of critical infrastructure to improve processes and controls over these areas.
- ✓ **Prepaid solar energy in Sudan:** In Sudan, MTN and the Regional Centre for Renewable Energy and Energy Efficiency (RCREEE) signed an agreement to offer prepaid solar energy on a pilot basis to domestic households. RCREEE is funded by the African Climate Change Fund. MTN Sudan will facilitate payments for prepaid solar energy via MTN Mobile Money.
- ✓ **Prepaid solar mobile energy systems:** MTN's prepaid solar mobile energy systems replace dangerous, noisy and polluting systems with clean, renewable solar energy. An estimated greenhouse gas of 3 613 metric tonnes of GHG emissions have been avoided in Uganda and Zambia, and 30 184 tonnes in Nigeria in 2017.
- ✓ **Implementation of energy efficiency and alternative energy initiatives:** Some of our efforts to manage the growth of our Scope 1 and 2 emissions in 2017 include the implementation of energy efficiency and alternative energy initiatives. Between 2011 and 2017, these initiatives have been implemented in more than 18 000 sites (including MTN-owned sites and outsourced sites). For 2017, we have seen the following results for MTN-owned sites:
 - **Number of additional energy-efficient sites:** 216 sites (up from 15 sites in 2016).
 - **Number of additional sites powered by alternative energy sources:** (solar and solar-hybrid): 459 sites. (2016: 1 001)
 - **Diesel reduction:** 317 kℓ (2016: 3 115 kℓ).
 - **Electricity saved:** 1 026 MWh (2016: 35 MWh).
 - **Emissions avoided due to diesel and electricity reductions:** 1 529 tCO₂e (2016: 339 tCO₂e).

- ✓ **Savings due to energy efficiency and alternative energy:** Below is an outline of some of the savings we have achieved due to on-going energy efficiency and alternative energy investments:
 - **Total direct Scope 1 and 2 GHG avoided/ reduced in 2017:** 1 529 tCO₂e (2016: 833 tCO₂e). *(This is additional carbon that would have been emitted in 2017 if it was business as usual.)*
 - **Total GJ energy saved in 2017:** 15 274 GJ (2016: 8 631 GJ).
 - **Cumulative diesel savings since 2011 to 2017:** 17 816 kl.
 - **Cumulative electricity savings since 2011 to 2017:** 38 250 MWh.
 - **Cumulative GJ energy savings since 2011 to 2017:** 676 967 GJ.
 - **Cumulative GHG avoided/reduced since 2011 to 2017:** 69 584 tCO₂e.
- ✓ **Environmental and Climate Change Risks incorporated into MTN's Corporate Risk Register:** The group's risk management framework includes two principal risks regarding environmental risks and impacts to MTN, complemented by a climate change risk reporting template. This report is completed by energy and carbon champions in our operations monthly, allowing us to track, monitor and work towards mitigating our top risks.



Peace, justice and strong institutions

"Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels."

MTN's actions, SDG partnerships and contribution

MTN's commitment to conducting business responsibly and ethically, while complying with applicable laws, regulations, and the terms of operating licences is increasingly being tested in a number of countries in which we operate. MTN has responded by building our human rights management efforts:

- ✓ **How we are guided on human rights:** We draw on global human rights principles and digital human rights frameworks, guidelines and recommendations of the United Nations, regional blocs, civil rights groups and expert views, paying close attention to the opinions expressed by our stakeholders. This in turn influences our processes, approaches and activities.
- ✓ **How we govern and manage our digital human rights compliance:** We have put in place policies, procedures and governance frameworks, and incorporated digital human rights into our risk, stakeholder and other management processes. These formal approaches are designed for flexibility and decision making under multiple scenarios. This allows us to adapt and respond quickly in light of the constant changes and significant pressures we may suddenly encounter.
- ✓ **How MTN promotes human rights:**
 - We safeguard communication privacy and security rights of our customers;
 - We are compliant with internationally recognised standards and legal requirements on freedom of expression, access to information, privacy and security of information;

- We are compliant with the terms of our licence conditions and legal obligations;
- We protect these rights through the terms of our Code of Ethics and our Employee Conduct Pledge.

- ✓ In Ghana, some of MTN's Muslim customers expressed concern, due to religious considerations, about automatically receiving interest payments on positive MTN Mobile Money balances. MTN Ghana worked with communities to understand these concerns, and customers may now opt out of interest accruals, selecting USSD options on their handsets to instruct MTN accordingly. The interest they would have earned will be invested into community projects.

17 PARTNERSHIPS FOR THE GOALS



Partnerships for the goals

"Strengthen the means of implementation and revitalize the global partnership for sustainable development."

MTN's actions, SDG partnerships and contribution

As is evidenced from our reporting on the SDGs, MTN has established significant partnerships across its footprint in the planning and implementation of numerous programmes that contribute to the SDGs.

- ✓ **Partnering with role players for change:** The MTN Foundations play a key role in MTN's commitment to bringing about meaningful and measurable change in disadvantaged and rural communities in the countries where we operate. The Foundation partners with communities, civil society, government and other NGOs across the Middle East and Africa.
- ✓ **Focusing on national priority areas in each country we operate in:** All MTN Foundations are tasked with identifying national priority areas unique to the countries they operate in, so that we can support them in bringing about local solutions to these challenges.
- ✓ **We use technology to drive social development:** Core to the Foundations' efforts is the use of technology to drive social development, particularly through education. We invested in ICT in education, enterprise development and health, including building and equipping customised ICT centres at special needs schools for a substantial number of learners.
- ✓ **Partnerships to enable connectivity, inter-operability and ensure large scale and impactful solutions:** This is fundamental in the mobile money ecosystem. MTN Ghana and Fidelity Bank are working together to offer the Y'ello Savings account, a high interest-bearing savings account. MTN and Afb Ghana also launched *Qwikloan*, a fully digital loan to help customers access capital, using their Mobile Money accounts, to enhance their businesses. The service is aimed at over one million customers in the informal sector, and ensures affordability by limiting the number of loans customers can take within a day or a week.

Progress on the Ten Principles

Introduction

MTN is acutely aware of the increasing scrutiny of the impact that corporates and their activities are having on people and the environment. We strive to not only honour the minimum requirements in respect of human rights, labour, environment and anti-corruption, but to develop the best possible ways to make voluntary, positive contributions to support each of the ten principles. To this end, we focus our support actions by adopting a materiality-based approach, which allows us to make a more considered contribution toward protecting and creating shared value for our company and our stakeholders. Our contributions to create Annual sustainability statements centre around the following:

- Ensuring digital inclusivity, supporting the growth of enterprises in our markets, and contributing to the transformation of natural, economic and social environments by developing Internet of Things (IoT) solutions;
- Being cognisant of the impact we have on the environment and taking responsibility for this;
- Taking responsibility for matters of good governance and ethics as a means to contribute to society; this includes anti-bribery and corruption, safe-guarding digital human rights, nurturing safe and supportive working environments, and doing business with partners who share our concerns for positive social and environmental impacts.

Governance

The MTN Group Social and Ethics Committee as a subcommittee of the Group Board has an independent role with accountability to both the Board and shareholders. The committee has the responsibility, inter alia, to monitor MTN's standing in terms of the ten principles set out in the United Nations Global Compact. The committee has a governance role with regard to good corporate citizenship, including MTN's promotion of equality, prevention of unfair discrimination, and reduction of corruption; contribution to development of the communities in which MTN's activities are conducted and within which our products or services are predominantly marketed; and MTN's standing on labour and employment.

The committee has the following responsibilities expressed in its terms of reference:

1. To monitor the company's activities regarding five areas of social responsibility:
 - i. social and economic development;
 - ii. good corporate citizenship;
 - iii. the environment, health and public safety;
 - iv. consumer relationships; and
 - v. labour and employment.
2. To draw matters within its mandate to the attention of the Board as required; and
3. To report to the shareholders at the company's annual general meeting on the matters within its mandate.

Mainstreaming into corporate functions

The business accounts for its ethics and sustainability risks, opportunities and performance as well as for reputation management and corporate social investment (CSI) through reporting at quarterly meetings. In 2017, Ethics Management resided within Human Resources, the aim of the

programme being a corporate culture with a strong ethics identity. Sustainability, stakeholder relations, issues management and CSI functions are implemented by dedicated functions within the Group Regulatory and Corporate Affairs department.

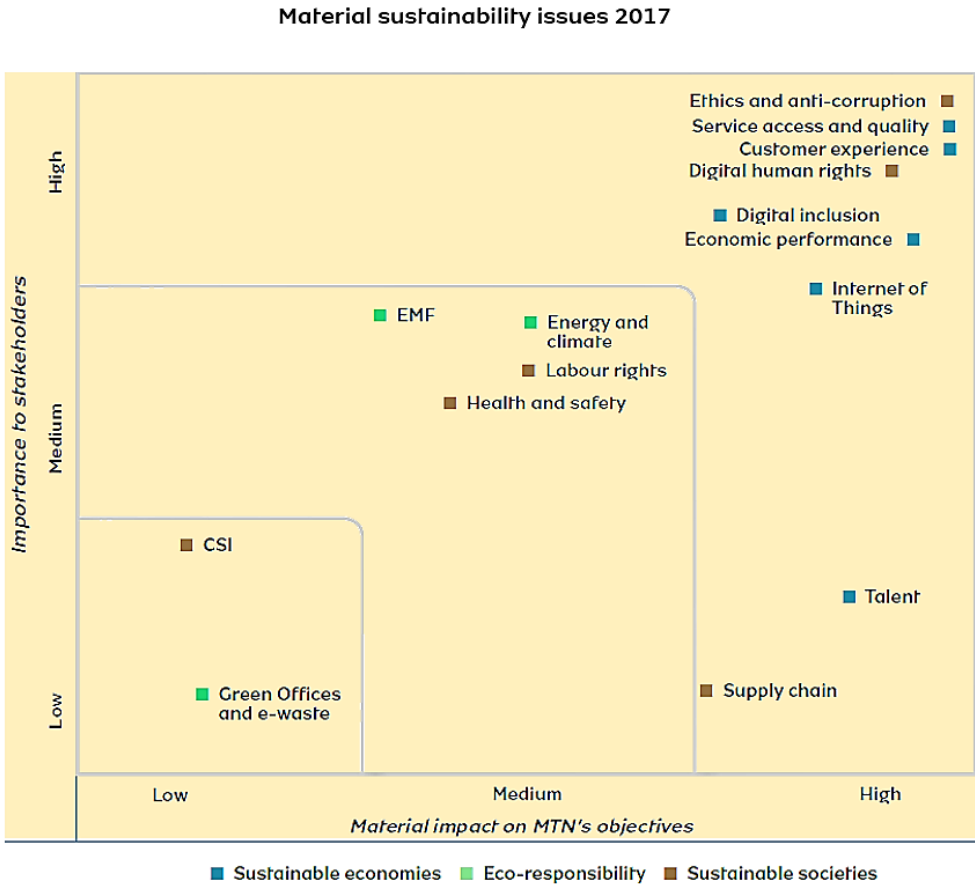
Within MTN’s operations, the ethics function is managed by the Senior Manager, Ethics, reporting to the Chief Human Resources Officer and the Group Social and Ethics Committee. Stakeholder relations and CSI functions are managed by Regulatory and Corporate Services departments. Functions that share responsibility for sustainability are Corporate Services, Networks and Information Technology, Facilities Management and others as required.

With a view to the future, a revised second and third line assurance model was approved by the board. The ethics function (with responsibility for UNGC reporting) is repositioned within risk and compliance, the latter being responsible for defining MTN's risk and compliance frameworks, oversight and monitoring of risk management, control compliance and ethics management practices and reporting to various stakeholders.

Thus, goals and aspirations associated with the Ten Principles are integrated into our business planning and management cycles. Internal departments and functions are ultimately responsible for leading progress on these goals.

Materiality

Our materiality assessment of key issues is a rigorous and systematic process integrating inputs from external stakeholders, information gained through engagements with various key groupings such as regulatory authorities, media organisations, civil rights groups, community-based organisations, our customers, and members of the public. It incorporates results from analysis, internal review and research processes. (See **Materiality** in *The MTN Group Sustainability Report 2017* (pp. 3 and 4) to learn more.)



Issue	
Ethics and anti-corruption	IR SR UN GRI4 UN GC
Access and quality	IR UN GRI4
Digital human rights	IR SR UN GRI4 UN GC
Economic performance	IR SR UN GRI4 www.mtn.com
Digital inclusivity	SR UN GRI4 www.mtnbusiness.com
Internet of Things	IR SR
Customer experience	IR UN GRI4
Talent	IR UN GRI4 UN GC

Issue	
EMF	UN GRI4
Energy and climate	IR SR CDP UN GRI4 UN GC
Health and safety	SR UN GRI4
Labour rights	IR SR UN GRI4 UN GC
CSI	IR UN GRI4 www.mtn.com
Supply chain	UN GRI4 www.mtn.com
Green Offices and e-waste	SR UN GRI4 UN GC

Human Rights

Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2

Businesses should make sure that they are not complicit to human rights abuses.

MTN Group's Freedom of Expression, Privacy and Security (Human Rights) Policy sets out the principles which MTN applies to safeguard the communication privacy and security rights of customers. It does this in a manner that is consistent with internationally recognised standards and legal requirements on freedom of expression, access to information, privacy and security of information, while ensuring that we remain compliant with the terms of our licence conditions and legal obligations. The Group's policy is informed by the **United Nation's Universal Declaration of Human Rights**, and takes into consideration some of the views expressed within the **United Nations Protect, Respect and Remedy Framework**, and by the GSMA, various industry groups working on this matter, and the **Access Now Telco Action Plan**. The policy is further supported by the MTN Group Code of Ethics, the Employee Conduct Pledge, and other key documentation relating to information security and information provision governance.

MTN thus recognises its responsibilities to respect human rights, addressing adverse human rights impacts associated with our business. Not only do we avoid infringement of the rights of others, but we actively contribute to supporting human rights in ways outlined below.

Contributing to developmental outcomes in our markets

- **Inclusion**

As the world becomes increasingly digital, we believe it is our duty to contribute to making more people feel that they are part of a world-wide connected society. MTN is therefore making a crucial contribution towards connectivity which we consider to be a fundamental need today. We believe that everyone deserves the benefit of a modern connected life, and we therefore strive for the democratisation of communication through affordable services to all our customers in the 22 countries across Africa and the Middle East where we operate. Our vision is to lead the delivery of a bold, new digital world to our customers, with a purpose to make our customers' lives a whole lot brighter, especially in the dire circumstances of some of the markets where we operate.

- **Empowerment and financial inclusion of disadvantaged persons**

We dedicate ourselves to improving mobile connectivity, accessibility and affordability with a range of solutions tailored to the needs of different market segments. These include youth, women, and the underbanked community who do not have sufficient access to mainstream financial services and products and who often rely on less favourable forms of finance and micro-finance associated with the poor and the disadvantaged.

In 2017 MTN continued its journey of increasing digital inclusion through mobile financial services in various countries, e.g. through MTN Mobile Money with its 21,8 million active subscribers. We are increasing the coverage and types of services we offer in our operations, including remote areas where the digital and financial services divide is often the greatest.

- **Powering communications**

The growth of digital communications, connectivity and inclusivity is constrained by lack of access to energy in many countries where we operate. Powering communications is MTN's solution to the challenge of energy access, affordability and reliability in some of our markets. We estimate that more than 1,3 million people are benefitting from MTN's solar charging solutions at present.

- **Other transformative digital solutions**

Our focus during 2017 has been to expand our understanding of how to ensure widespread and effective inclusion that will help close the digital and socio-economic divide. Although we launched a number of mobile solutions during the year, we also continued researching solutions that can be tailored to the markets where we operate and ways in which we can best deliver such solutions on a large scale in a coherent manner. Our solutions include mHealth services, connecting individuals to the healthcare services and information they need when they need it, and providing technological standards for users with disabilities. We also expanded our existing mEducation initiatives by providing access to information and providing technological standards.

- **Transforming enterprises**

In the emerging regions of Africa and parts of the Middle East where MTN operates, it is crucial that small, micro and medium enterprises (SMEs) are nurtured for growth. This helps in building sustainable livelihoods while helping us to support the UN's SDGs for decent work and economic growth, and partnerships for the goals. In 2017 we offered affordable and efficient connectivity solutions to our customers, while offering innovative and convenient network and internet solutions for small businesses. We also built entrepreneurial capacity by giving small business owners the opportunity to learn from leading business owners and to integrate feedback into their own businesses. We supported start-ups, women and youth in business. MTN Ivory Coast, for example, launched the first edition of an incubation programme to assist young entrepreneurs.

Learn more about how MTN promoted human rights in 2017

To learn more about digital inclusion, powering communications and other digital solutions that are transforming lives, please refer to the **MTN Group Sustainability Report** (pp. 10–27).

Labour

Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4

The elimination of all forms of forced and compulsory labour;

Principle 5

The effective abolition of child labour; and

Principle 6

The elimination of discrimination in respect of employment and occupation.

MTN's BRIGHT strategy includes a focus on 'Hearts and Minds'. 'Hearts' concerns the people in our company: motivation, engagement, talent, the central role of the manager, communication, and inspiring people around the strategy. 'Minds' concerns our reputation: managing our corporate reputation, our approach to governance, risk and compliance and regulation, stakeholder management, public relations and corporate affairs.

MTN goes to great lengths to create a positive, vibrant working environment that supports learning and development, that encourages and enables work-life balance, and that promotes innovation and creativity. We support and respect the human rights of our employees, and therefore we provide a healthy, safe and non-threatening workplace to each employee. We treat all people with respect and dignity, and expect of our employees and our business partners to do the same. We in no way tolerate harassment and intimidation of any kind. We further guarantee our employees the right to freedom of association, and we make reasonable accommodations for all employees' religious observance and practices. We respect our employees' privacy and the confidentiality of their personal information.

The MTN workplace is becoming increasingly digitised, and hence digital security has become critical due to the connections between internal and external systems and communications infrastructure, the use of cloud services for the storage of information and the increased use of employee-owned devices on MTN's corporate network.

• **Our "Hearts and Minds" focus in 2017**

We introduced modernised work spaces and technology designed for collaboration within the working environment as well as across our operations. This is underpinned by our plans to build a great MTN culture to achieve the ideal kind of employee experience that we are aspiring to.

We also improved employee engagement and motivation, showing a positive upswing in sustainable employee engagement scores for the third consecutive year since 2014. Employee promoter scores also improved consistently since 2014.

We considered a revised stakeholder management approach so as to ensure stakeholder inclusivity and responsible corporate citizenship. We prepared to introduce a more integrated approach to CSI in pursuit of shared value by making better use of MTN's skills, assets and

other institutional capabilities and to ensure that this work is integrated into initiatives to deliver on our BRIGHT strategy.

In line with our Hearts and Minds pillar of our BRIGHT strategy, we have made efforts to strengthen our control and compliance environment. This entailed reviewing MTN's risk management structures and policies, and introducing a new risk appetite and tolerance methodology. We split the functions of risk and compliance (the second line of defence) and internal audit (the third line of defence) to strengthen our risk and control environment. We also calculated our risk-bearing capacity and applied this by means of our revised risk tolerance and appetite framework. The implementation of the new model will significantly enhance our governance practices.

• **Our people focus in 2017**

MTN has developed a strong employee value proposition, 'The MTN Deal', which provides employees with real opportunities, experiences, and interactions with colleagues over real platforms and offering real rewards. The programme has five pillars:

- Brand strength
- Leadership brand
- Investing in our talent
- Globally diverse culture
- Total reward and recognition

We believe that the investment in our people is critical to achieving our strategy and to improve our competitive edge. We recognise the importance of employee engagement and development in order to deliver the best customer experience and to improve our business performance. Our HR approach focuses on the creation of a high-performance culture, sustaining our high-potential factory, and creating employee-centric solutions.

Central to our customer-centricity approach is ensuring that we have a diverse workforce that understands the varied needs of our subscribers. We are therefore building a multi-cultural workforce across the markets in which we operate. At the end of December 2017, MTN employed 15 901 permanent employees and 3 030 contractors, from 63 different nationalities.

• **Our gender equality focus in 2017**

MTN Group promotes gender equality and is committed to eradicating unfair gender discrimination. MTN Group commits itself fully to the articles of the ***Convention on the Elimination of all forms of Discrimination against Women***, as well as to the ***Women's Empowerment Principles*** of the UNGC.

MTN's position and actions to promote gender equality are underpinned by the following principles:

- High-level corporate leadership commitment to gender equality.
- Every person associated with MTN Group is entitled to enjoy the fundamental right to gender equality and human dignity. We therefore treat all employees fairly at work, respecting and supporting their basic human rights and their right to non-discrimination.
- MTN ensures the health, safety and well-being of all its employees.

- We ensure that work-life balance is enabled through policies that support educational, career and occupationally-directed development of women, and that support flexible work arrangements.
- We regard unfair gender discrimination as a serious offence, a gross violation of fundamental rights and detrimental to the status of the MTN Group. Transgressors are therefore subject to our disciplinary procedures.

MTN's gender policy protects persons unfairly discriminated against on the basis of gender. Through the policy and our women empowerment initiatives we create an enabling environment that specifically addresses the special needs of women and that promotes advancement of all persons, free from gender bias.

• **Developing our talent**

For MTN talent management is a strategic initiative to ensure organisational sustainability. The quality of the people we attract, develop and retain impact our profitability, providing us with a competitive advantage. Our talent management processes are therefore robust and rigorous, enabling us to identify, assess, develop and suitably deploy our future talent.

Through succession planning we focus on those roles most at risk in terms of current occupancy and future replacement. We ringfence critical positions and ensure that we have a pipeline of suitable talent for future appointment. In 2017 we continued to apply our build, boost, borrow and bind talent strategy to manage our talent risks.

In 2017 we continued to emphasise development of the skills of our talent to ensure our employees are equipped to meet the needs of the evolving ICT industry. Our digital e-learning platform enabled 445 606 course completions across 31 118 employees and contractors in 2017, averaging 14 online learning programmes per employee. The learning foci for 2017 were:

- Customer experience
- Sales and business operations
- Technology excellence
- Leadership and culture

MTN's **Global Graduate Development Programme (GGDP)** sources, develops, and accelerates top graduate talent from across MTN's footprint in Africa and the Middle-East. The GGDP fast-tracks talented individuals into critical roles at MTN by giving them targeted exposure that combines formal development (in partnership with Duke Corporate Education and the MTN Academy), as well as on-the-job development where graduates are employed in MTN's operating companies. The participants also experience job rotation which includes in-role experience, varied interactions with the executive committees, mentoring, and coaching.

• **Digitisation of Human Resources**

In 2017 MTN focused on improving efficiency, effectiveness and employee experience for HR. This included a number of initiatives to digitise HR. The following initiatives were rolled out with success:

- MTN's Global MyStrengthsFinder system is a talent management and development platform for all employees.
- **InfoSlips** was implemented group-wide as an efficient means for employees to access their personal remuneration and reward information.

- We increased the use of **MTN Shine**, our on-the-spot recognition platform to drive a high-performance culture. During 2017, more than 300 000 recognition messages were sent on the platform.
- Embracing artificial intelligence, MTN introduced “**Ziya**”, a computer programme that presents as a chatbot to engage in conversation with employees. Ziya is an HR specialist who for now engages with MTN Group employees based in Johannesburg.

• **Remuneration**

Part of MTN’s people-centred approach to talent management includes a holistic remuneration philosophy. We attract, motivate, retain and engage the appropriate talent to execute our business strategy. We are cognisant of the competitive talent landscape which dictates a reward system that differentiates and competitively matches pay for results, delivered without bias and with fairness and flexibility across our markets.

In 2017 we continued to review and benchmark our reward components. We linked short- and long-term incentives to relevant performance indicators. Performance remained the basis for employee reward, yet we continued to customise reward to address the varied needs and lifestyles of employees. We maintained full regulatory and legislative compliance in our markets, and regularly audited and assessed our risks, benefits and compliance of reward.

Our decision-making processes and the operationalisation of all reward matters continued to be directed by a range of remuneration policies endorsed by management and governed by our remuneration committee. We continue to strive to deliver a legislatively compliant reward system that is aligned with the future strategic objectives of the company.

• **Independent accreditation for HR Practices**

MTN follows the **Global Investor in People (IiP)** standard to obtain external, independent assurance of the quality of its people management practices. The IiP defines what is required to lead, support and manage people well for sustainable results.

At December 2017, seventeen MTN operations had achieved varying levels of IiP accreditation. The highest level of accreditation (Gold) was attained by –

- MTN Cameroon
- MTN Ghana
- MTN Nigeria
- MTN Swaziland and
- MTN head office

Learn more about how MTN promoted labour principles in 2017

To learn more about MTN’s promotion of labour principles, please refer to the **MTN Group Integrated Report** (pp. 79-83) and the **MTN Group Sustainability Report** (pp. 47-49).

For details about specific implementation programmes supporting labour principles, please note the **MTN Group Sustainability Report** (pp. 47-49).

Environment

Principle 7

Businesses should support a precautionary approach to environmental challenges;

Principle 8

Undertake initiatives to promote greater environmental responsibility; and

Principle 9

Encourage the development and diffusion of environmentally friendly technologies.

Many of the countries MTN operates in are too under-resourced economically and socially to mitigate severe environmental impacts and to develop the necessary resilience to withstand these impacts in the long run. We recognise that it is therefore all the more important that we reduce our impact on the environment, especially in the more vulnerable communities where we operate. To address resource constraints and promote more efficient use of natural resources, we are tapping into our capabilities and cultivating partnerships around smart technologies.

While we work actively to reduce our climate impact and our use of natural and manufactured resources, we still face the following challenges:

- The growth of our energy-intensive networks constrains our reduction of greenhouse gas emissions.
- Managing electronic and electrical waste on the African continent. We remain committed to address this global challenge and are therefore cultivating partnerships that are already rendering promising results at this early stage.

We are pleased that MTN's Green Office programme has resulted in savings in energy, water and paper use. The amount of waste sent for recycling has increased, and we have raised awareness about environmental issues among our staff.

Further progress includes the group environmental policy which will replace or complement existing country operation policies. The policy has been defined and the consultative process has been concluded. The assessment of the implementation road map to meet the policy objectives is in progress and the policy should be finalised in 2018.

MTN Irancell, Swaziland and the MTN office in Gallo Manor, Johannesburg, joined the Green Office Programme in 2017, and operations are tracking their progress on initiatives with regard to the programme.

• Energy use in 2017

MTN operations consumed 19 095 879 gigajoules (GJ) of energy in 2017. This was mainly from grid electricity, diesel and petrol. Our technical facilities (network sites, data centres, switches and hubs) are the primary energy consumers for MTN's operations. This infrastructure, which enables MTN's communication services, is responsible for 95,8% of MTN's total energy consumption. We engage with our network partners to understand the programmes they have implemented or are planning to implement. This engagement gives us greater confidence that our outsourced infrastructure has systems and controls in place to mitigate negative impacts

for our business and ensure business continuity. Despite the good reports submitted to us by our network partners, we are conscious of the costs, challenges and barriers they face, particularly when they operate in remote areas.

Learn more

- **Refer to our website** for an infographic and case studies showcasing how we continue to reduce our reliance on fossil-based fuels by driving energy efficiency and investing in the rollout of renewable energy technologies:
<https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/default.aspx>
- MTN's IoT solutions addressing water, energy, animal management, and smart city and refrigeration requirements may be reviewed in the **MTN Group Limited 2017 Sustainability Report** (pp. 25-27)
- **Associated reports:** Latest MTN Group CDP and UN GRI 4 on
<https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx>
<https://www.cdp.net/en>
- **Position papers:** Environmental positions on how we manage and operate our networks, as well as how we manage health aspects in the use of mobile technologies:
<https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx>
- **Case studies** on MTN's solutions for environmental issues:
<https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Case-studies.aspx>

- **Environmental management**

In 2017, MTN Cyprus and MTN South Africa maintained their ISO 14001 status after independent external annual audits of each operation's performance had been conducted.

We are concerned about the following:

- The likelihood of environmental risk on our supply chain impacting MTN in future
- The global rate of consumption of resources
- The impact of waste materials on natural environments and communities.

We are therefore extending our focus to ascertain if our suppliers have the systems in place to cope with adverse climate, environmental or social impacts, and whether they are reducing their environmental footprints.

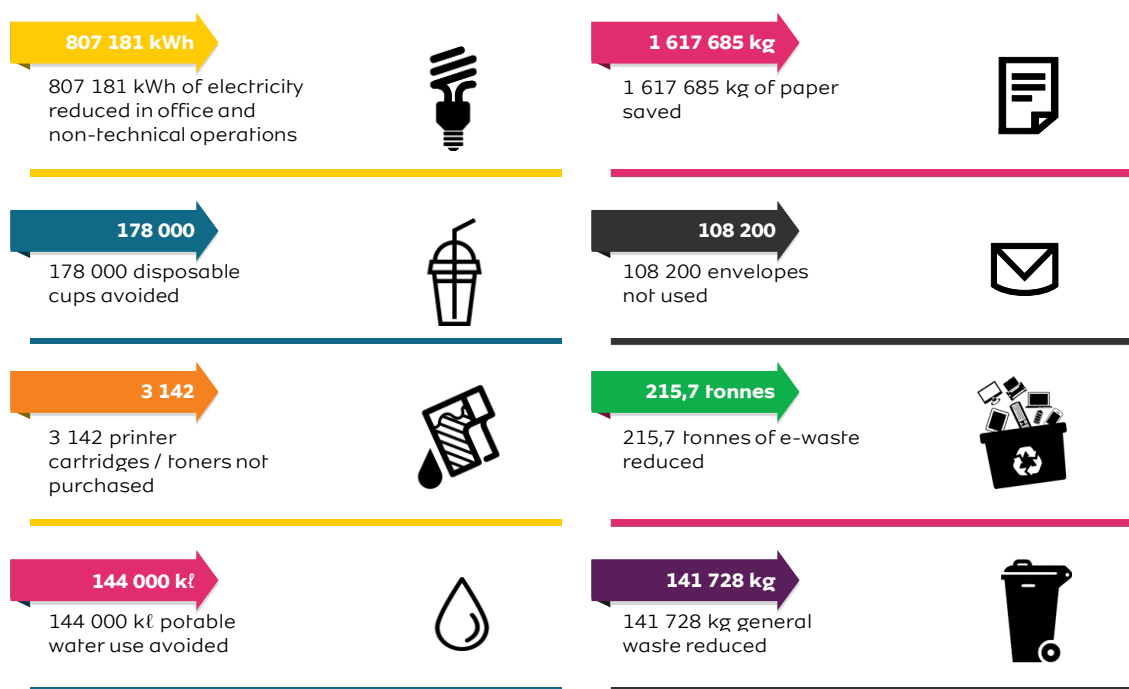
MTN's new supplier Code of Conduct distributed in 2017 sets out the minimum standards that suppliers, their employees and subcontractors must adhere to when conducting business with MTN. They are expected to –

- conduct environmentally sustainable business activities, which includes reviewing the state of their workplaces;
- ensure that environmental authorisations, permits and reports are submitted to MTN upon request,
- reduce resource consumption;
- prevent pollution and minimise waste outputs; and
- ensure responsible management of hazardous materials.

- **Green Office operations**

MTN's Green Office programme aims to reduce the consumption of natural and manufactured resources in the office environment through active conservation initiatives and the promotion of sustainable practices. Activities focus on reducing consumption and waste from energy, water, paper and toner, general plastic, glass, tin, electronic and other waste. Solutions have also been developed that are aimed at sustainable practices in the group's procurement chain, travel activities and event management.

MTN Green Office results for 2017



- **Waste electronic and electrical equipment (WEEE) management**

At the core of the digital economy is the development of ICT, which has challenging effects on the environment. WEEE or e-waste can be toxic and otherwise harmful to the environment, including to human health if not handled properly.

MTN generates e-waste largely from end-of-life radio or network equipment, products that enable cooling, and computing devices such as laptops. Our customers also generate waste when they discard old cellular handsets and tablets. Non-MTN subscribers and organisations who are no longer able to use their assets such as computers, data centre and technical equipment and other electronic devices also face such challenges. To address this complex and growing problem necessitates collaboration among like-minded organisations and communities to approach the problem in a coordinated and effective manner.

Through our partnerships we focus on improving the volumes of waste collected within our operations and from the public. We also try to ensure that e-waste is diverted to responsible handlers. In Benin, Cameroon, Cyprus, Iran, Ivory Coast, Nigeria, South Africa and Uganda, waste collection or supplier take-back agreements have been signed or are ongoing.

Learn more

To learn more about MTN's environmental management activities, case studies and results, refer to *MTN Group Limited 2017 Sustainability Report* (pp. 35-38).

Anti-Corruption

Principle 10

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

MTN believes that its efforts in fighting corruption begins with ethical leadership. MTN has a vested interest in ensuring that it provides effective leadership based on an ethical foundation. We believe that fraudulent and corrupt activities threaten the sustainability and reputation of our business. As expressed in our Code of Ethics, it is our policy to conduct all our business activities with honesty, integrity and to the highest ethical standards, and we take a zero-tolerance approach to fraud, bribery and corruption as we constantly strive to improve our fight against it. Our efforts against corruption are aligned with the overall Group ethics management framework, and we recently updated the MTN Group anti-bribery and corruption policy to express this alignment.

MTN follows a dual approach to the management of ethics: an integrity (or values-based) approach combined with a strong compliance focus. MTN's compliance model is characterised by external enforcement of ethical standards upon the organisation (e.g. through codes and policies), while our integrity approach means that we invite the personal commitment of individual employees to our shared corporate values. Employees and suppliers are expected to act in ways that are morally responsible.

- **Governance**

The Group Board's social and ethics committee exercises strategic oversight of the ethics performance of MTN. This is aided through the committee's partnership with the risk management, compliance and corporate governance committee, which ensures that MTN business is conducted in a way that is sustainable and reflective of the company's culture of ethics.

In 2017 the committee continued to ensure the implementation of an ethics management strategy addressing ethics risks. In addition to the Group-wide ethics strategy roll out, each opco implemented a series of interventions based on their specific ethics risks and opportunities profile.

The committee improved ethics accountability at executive level and ensured that dedicated ethics management functions were expanded beyond tier 1 operations.

- **Positioning of the ethics function**

In 2017 we continued to focus efforts on strengthening MTN's control and compliance environment. This involved the design of a revised second and third line assurance model, which provides for a clear separation in the three lines of assurance within MTN, i.e., first line of assurance being responsible for business risk management function and implementation of controls to maintain a strong control and compliance environment; second line of assurance being responsible for defining the risk and compliance frameworks of the organisation, oversight and monitoring of risk management, control, compliance and ethics management practices and reporting to various stakeholders; and third line of assurance being responsible for providing independent assurance to MTN stakeholders on the state of the control environment of the organisation.

- **Ethics management structures**

Ethics management structures and ethics office capability were further bolstered in 2017 through the Ethics Officer Certification Programme (EOCP). The total number of certified, registered MTN ethics officers increased to 27.

- **Measuring ethics governance and management**

During the year, opcos were assessed on those ethics management elements considered essential for the enhancement of ethical culture in the Group. Criteria reflected minimum standards set and were derived from MTN's ethics management framework. The results of the assessment provided insight into opcos' development needs and dictated the nature of assistance each opco requires from the group ethics office.

- **Institutionalisation of ethics**

Ethics management practices are well-embedded in the group of companies. The year under review saw a shift in emphasis to ensure that ethical standards continued to be well-communicated and understood by all employees. Initiatives were implemented across the group of companies by the Group office, complemented by opco-specific interventions managed by each opco's ethics task team. A comprehensive series of interventions was implemented during the year to address ethics risks and opportunities in differentiated ways for various stakeholders. During the year interventions focused on enabling employees and other stakeholders to contribute to greater corporate integrity:

- **Corporate integrity, ethics and anti-corruption communication campaigns:** An enterprise-wide sustained communications campaign was conducted during the year to raise awareness, educate staff and reinforce our message regarding ethical conduct, anti-corruption and fraud prevention. Other means included ethics and fraud prevention quizzes and an ethics portal on the intranet with crucial ethics information accessible to all staff.
- **Ethics education and training of staff:** During the year, 451 employees completed ethics-related online courses, bringing the number of online ethics course completions across MTN since 2014 to a satisfactory 20 928. In 2017 considerable efforts were made to balance ethics e-learning with facilitator-led conversations about integrity in the workplace, with each Opco conducting a minimum of one series of employee engagement sessions on ethics. An online ethics module and associated assessment formed part of the onboarding activities of all new staff members. A bespoke MTN video-based e-learning training toolkit (*Business Ethics – Everyone's Responsibility*) was developed in MTN's main languages for use across all operations for all employees. The toolkit enables ethics champions to facilitate focus groups to build a uniform understanding of ethical conduct.
- **Supplier engagement on conduct:** MTN's new Supplier Code of Conduct was shared with Group suppliers in March 2017. As part of MTN's supplier on-boarding process new suppliers are only invited to MTN RFPs after they acknowledge the Supplier Code of Conduct. For existing suppliers, an annual supplier health check was launched which requires the acknowledgement of the Supplier Code of Conduct. A new supplier section added to MTN's public website provides an overview of the SCM function and its concern for ethical supply chain management practice.
- **Recognition for the promotion of corporate integrity:** Through the MTN recognition programme and platform, employees may recognise colleagues for exceptional behaviour and professional achievements. For 2017 a total of 30 178 instances were

recorded online where employees recognised colleagues for promoting corporate integrity.

- **Declaration of conflicts of interest; registration of gifts:** 2017 was again marked by the annual declaration of conflicts of interest and registration of gifts in accordance with the Gifts, Hospitality and Entertainment policy.

- **Ethics risk management**

MTN's identified ethics risks were recorded and tracked as part of the company's key risks using our enterprise risk management methodology. Along with all other corporate risks, MTN's ethics risks were defined according to the same risk appetite framework, ensuring proper risk treatment, monitoring and review.

- **External participation for the advancement of corporate ethics**

As a member of the steering committee for the Ethics Practitioners Association, an organised professional body, MTN demonstrated its commitment to advancing the professionalisation of ethics practitioners. MTN also collaborated on the development of The Ethics Institute's *Ethics Office Handbook*.

- **MTN's anti-corruption practices**

For MTN, it is important that our employees are aware of what constitutes fraudulent or corrupt behaviour, and what they need to do once they are aware of potentially fraudulent activities. Employees are required to raise their concerns and report wrongdoing within the workplace. The whistleblowing facility is operated independently by an outsourced service provider and is governed by the MTN Group Whistleblowing Policy.

MTN clearly states its expectations and requirements relating to the prohibition, recognition, reporting and investigation of suspected fraud and other similar irregularities. These include –

- any dishonest, fraudulent or corrupt act;
- theft of funds, supplies, or other assets;
- maladministration or financial misconduct in handling or reporting of money, financial transactions or other assets;
- making a profit from insider knowledge;
- disclosing confidential or proprietary information to outside parties;
- irregularly accepting, requesting, offering or giving anything of material value to or from contractors, suppliers or other persons providing services/goods to the department;
- irregular destruction, removal or abuse of records, furniture and equipment; blackmail or extortion;
- money laundering and terrorist financing;
- criminal activities carried out by means of computers or the internet specifically targeted at MTN (cybercrime);
- any similar or related irregularity; and deliberately omitting or refusing to report or act upon reports of any such irregular or dishonest conduct.

We consider facilitation payments as bribes, and therefore illegal, hence we only do business with parties that do not make facilitation payments. Our gifts policy includes a declaration of

gifts in a gift register, and all employees are expected to record gifts, hospitality and corporate expenses. Procurement policies and procedures are communicated to employees and suppliers to ensure selected providers of services are aware of our requirement to act in a legal, ethical and professional manner. We further work to ensure that third party engagements are for bona fide purposes, that adequate due diligence is conducted, and that compensation is appropriate and remuneration justifiable for legitimate services rendered.

In our dealings with public officials and government employees, we work to ensure that we act in an ethical manner. We also recognise that strong democracies require healthy political parties, and that these parties require resources to represent people, operate structures, contest elections and meaningfully contribute to political debates; therefore, our political donations policy sets out our political support during general elections in countries. Political party financial support is only provided should a country hold national elections, and funding is allocated to each party in relation to its performance in general elections. We act in an entirely open manner and will publicly disclose political donations made. As part of our corporate citizenship role, charitable donations and sponsorships are encouraged, but we will not undertake this with the intention of placing actual or potential customers, suppliers or public officials under any obligations.

Anti-fraud case study

MTN Ghana worked closely with authorities and other mobile operators to introduce an agent registry that will blacklist mobile money operators who have committed fraud. A 'Cash Out' feature was also introduced, allowing customers to opt out of transactions with agents prior to initiation and completion. Judges and police are being trained on how the mobile money system works and how customers may be defrauded during transactions, which will help inform prosecutions and judgments. Police services also assist in screening people who apply for mobile money agencies, while agents who commit fraud are sanctioned by MTN. Transaction monitoring and tracking systems, customer helplines and education campaigns, and system audit trails further ensure that MTN provides as secure a service for our customers as far as possible.

Learn more

- **Position papers**

To learn more about MTN's position on ethics, anti-corruption and related matters, refer to:

<https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/Ethics-policy-positions.aspx>

and

<https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx>

- **Code of Ethics**

<https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx>

UNGC Communication of Progress for 2017



Alignment with the GRI-G4

The UN GRI G4 Guidelines (which now include standard disclosures and core indicators) were used in preparation of this COP for 2017.



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

Abbreviations

- UNGC: MTN Group Global Compact Communication of Progress Report 2017
- IR: MTN Group Integrated Report 2017 (IR)
- SR: MTN Group Sustainability Report 2017 (SR)
- CDP: MTN Group Carbon Disclosure Project report 2017 (CDP)
- MTN Group website (www.mtn.com)

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
HIGH-LEVEL COMMITMENT AND STRATEGY			
G4-1	CEO statement (including our continued UNGC support)	- o Communication of Progress (COP) - o IR: Q&A with Group President and CEO - o SR: Group President and CEO's message on sustainability	COP 5 30-31 5-8
G4-2	Impacts, risks and opportunities	o IR: Top risks to value creation	20-21
CONTEXT OF OPERATION AND VERIFICATION			
G4-3	Name of reporting organisation	o MTN Group Limited	
G4-4	Primary brands, products, services	- o IR: What we offer - o https://www.mtn.com/en/what-we-do/Pages/default.aspx	3
G4-6	Operating structure	- o IR: Our executive committee - o IR: Management of or top opcos	72-73 74-75
G4-5	Location of Headquarters	o 216 - 14th Avenue Fairland 2195 Gauteng South Africa	
G4-6	Geographic scope / map of operations	- o IR: Where we operate and how we performed - o https://www.mtn.com/en/mtn-group/about-us/our-story/Pages/where-we-are.aspx	8-9
G4-7	Nature of ownership and legal form	o https://www.mtn.com/en/investors/Pages/default.aspx	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
G4-8	Profile of customer base, markets served and sectors served	o https://www.mtn.com/en/what-we-do/Pages/default.aspx	
G4-9	Scale of operations of the reporting organisation including number of employees and operations	- o IR: About this report - o SR: Scope, boundaries	Inside front cover (IFC) IFC
G4-13	Changes occurring within the reporting period regarding size, structure or ownership	• Annual financial statement at https://www.mtn.com/en/investors/Pages/default.aspx	
	Awards received	Congo Brazzaville • MTN Congo Brazzaville Foundation named Best Foundation by the MB Production (Médard BONGO Productio) NGO. • UN-R2 PDH (United Nations Reality * Perspective * Peace-Democracy-and Human Rights) lauded MTN Congo B Foundation, as a Messenger of Peace and Advocate for Human Rights. Cameroon • MTN Cameroon named Best Corporate Citizen during the 6th edition of SAGO - (Le Salon de l'Action Gouvernementale) • Named best Internet provider 2017, by "Les Trophées de Zoe" in partnership with Gicam) South Africa • MTN SA awarded two Loeries - Gold in the category; "TV Crafts - Best use of Licensed Music" and a Silver in the category; "TV & Cinema Commercials – Up to 905," for the MTN Night Shift campaign. • MTN SA won a joint award with Huawei at AfricaCom 2017. The 'Delivering Excellence in Customer Experience award was in recognition of the two companies' work to help customers feel the brighter side of life. Nigeria • MTN Nigeria received Corporate Pacesetter award and the 9jaSAFE Merit award at the 9jaSAFE Awards 2017 (Nigeria Safety Award for Excellence). Uganda • MTN Uganda took the top spot in five categories at the Digital Impact Africa Awards: ✓ Digital Brand of the Year – MTN Uganda ✓ Best Technology Brand on Social Media – MTN Uganda ✓ Best Mobile Financial Service for Africa – MTN Mobile Money ✓ Best Financial Inclusion Product/Service MTN/CBA – MoKash ✓ Best Digital Customer Service by Technology Brand – MTN Uganda Ghana • MTN Ghana acknowledged in five categories at the HR Focus Magazine Awards: ✓ Overall Best Organisation in HR Practice. ✓ Best HR Management in Telecommunications and IT ✓ Best Practice in Human Resource Information Systems (HRIS) ✓ Best Organization in Organizational Culture ✓ Employer of Choice ✓ HR Practitioner of the Year • MTN Ghana received 8 awards at the 2017 Ghana Information Technology and Telecoms Awards: ✓ Customer Experience Award	

- ✓ 4G LTE Provider of the Year
- ✓ Mobile Money Service of the Year
- ✓ Cloud Service Provider of the Year
- ✓ CSR Company of the Year
- ✓ Mobile Operator of the Year
- ✓ IT Team of the Year
- ✓ Customer Service Team of the Year
- ✓ CEO of Year (Mr. Ebenezer Asante)
- ✓ CTO of the Year (Mr. Mohammed Lawal Rufai)

- **Telecommunications Service Executive of the Year** (Awarded to MTN Ghana CEO, Mr. Ebenezer Asante)
Ghana Entrepreneurship and Corporate Executive Award

Institute of Africa Media Monitoring Intelligence and Advocacy (IAMMIA Africa):

- Ghanaian Telecommunication Sector Media Visibility Index in the first quarter of 2017 (Mr. Ebenezer Asante)
- Clean Environment (MTN House) by the Accra Metropolitan Assembly

Chartered Institute of Marketing Ghana (CIMG):

- Marketing Man of the Year (Mr. Ebenezer Asante)
- Telecom Company of the Year
- Marketing-Oriented Company of the Year

Ghana CSR Excellence Awards:

- Safety and Wellness
- CSR Practitioner of the Year (Mr. Robert Kuzoe)

Investors in People (IiP):

- Gold Accreditation - MTN Ghana awarded gold accreditation in the Investors in People Standard

Ghana Investment Promotion Center (GIPC) Ghana Club 100:

- Second Best Company
- Highest Tax Payer of the Year
- Largest Company
- Most Child Friendly Business in Ghana

Institute of Public Relations (IPR):

- PR Organisation of the Year
- Best Organisation in Crisis Communications
- Best for a Cause Communication

Sustainability & Social Investment Awards organised by Ion Africa Business (IAB):

- Foundation of the Year
- Best Company in Partnership for Community Development Project of the Year

Assurance

- | | | |
|-------|---|---|
| G4-33 | Process to provide independent verification for the COP / Policy on independent assurance | <ul style="list-style-type: none"> • Assurance statements are available at https://www.mtn.com/en/investors/Pages/default.aspx |
|-------|---|---|

Governance

- | | | | |
|-------|---|--|------------|
| G4-34 | Company's governance structure (including major committees) | <ul style="list-style-type: none"> • IR: Governance • SR: Our approach to sustainability | 56-75
3 |
| G4-39 | Is the chairman also an executive officer? | <ul style="list-style-type: none"> • Yes | |
| G4-40 | Board profile: number, gender, Executive vs. Non-executive | <ul style="list-style-type: none"> • IR: Governance | 56-75 |

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
G4-49	How do stakeholders provide recommendations to the board?	IR: Our approach to risk management	60-61
G4-51	Link between remuneration and leadership performance	IR: Remuneration report	79-83
G4-41	Managing conflicts of interest	IR: Governance	56-75
G4-40	Process for determining leadership qualifications	IR: Governance	56-75
G4-42	Internally developed mission / value statements, principles or codes related to sustainability	IR: Governance – Social and Ethics Committee	62
G4-45	Board oversight of sustainability	- IR: Governance - SR: Our approach to sustainability	56-75 3
G4-44	Processes for evaluating the board's sustainability performance	Not available	
Stakeholder engagement			
G4-24	List of stakeholder groups	- IR: Relationships on which we rely to create value - SR: About this report	18-20 1
G4-25	How are stakeholders identified?	- IR: Relationships on which we rely to create value - SR: About this report	18-20 1
G4-26	On-going mechanisms for stakeholder engagement: who, how, what outcomes	- IR: Relationships on which we rely to create value - SR: About this report	18-20 1
G4-27	Stakeholder concerns and how the organisation responded	- IR: Relationships on which we rely to create value - SR: About this report	18-20 1
-	How MTN's Communication of Progress (COP) has been shared with our stakeholders	- Publicly on www.mtn.com - With staff across the group of companies via intranet	
DISCLOSURES ON MANAGEMENT APPROACH			
Economic			
EC:MD	Management approach: economic performance, market presence and indirect economic aspects	www.mtn.com/en/Investors/Pages/default.aspx	
Economic performance			
G4-EC1	Economic value added	- IR: Key financial tables - Annual financial statements on https://www.mtn.com/en/investors/Pages/default.aspx	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
G4-EC2	Climate change related financial implications, risks and opportunities	- SR: Energy and climate risks, mitigation and opportunities - CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx - Latest group CDP report: www.cdproject.net	34
G4-EC3	Defined benefit plan obligations coverage	IR: Remuneration report	79 - 83
G4-EC4	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, 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 SA Revenue Services, have a payroll above a government-determined threshold, and make payments of 1% of monthly payroll costs in the form of a National Skills Development Levy); the company invests this rebate and further skills development grants into training and skills development programmes for staff and unemployed / inexperienced learners.	
-	Capital investment in telecommunication network infrastructure broken down by country/region	- IR: Where we operate and how we performed - Manufactured capital: Capital expenditure: R31,5 billion Networks in 24 countries 2G sites rolled out in 2017: 3 663 3G sites rolled out in 2017: 8 583 4G sites rolled out in 2017: 8 611 Kilometres of fibre rolled out: 4 364 km We focused our capital investment on rolling out new 3G and 4G base stations, data and switching centres and dedicated fibre. By expanding our networks, we increase the stock of manufactured capital and reduce our stock of financial capital in the short term. However, ultimately this investment should boost our business and therefore our stock of financial capital in the longer term. By advancing manufactured capital, we negatively impact natural capital. However, by sharing infrastructure and increasing the efficiency of existing infrastructure we can mitigate our impact on the stock of natural capital.	8 - 9
-	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's 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	Not available	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
G4-EC9	Policy, practices, and proportion of spending on locally-based suppliers	- SR: Annual sustainability statements (black economic empowerment) https://www.mtn.com/en/mtn-group/supplier/group-scm-overview/Pages/Local-supplier-empowerment.aspx	53
G4-EC6	Procedures for local hiring (including senior management)	- The MTN Group hires locally as far as possible. While we do report on the percentage of expatriate employees, we do not indicate this by management level. - SR: Annual sustainability statements	51 - 53
Indirect economic impacts			
G4-EC7	Positive public impact of pro bono / donated infrastructure and services	- IR: How we create value using the six capitals - SR: Annual sustainability statements https://www.mtn.com/en/mtn-group/social-investments/Pages/default.aspx	14 - 15 51 - 53
G4-EC8	Significant indirect economic impacts, including extent	Not available	
ENVIRONMENTAL			
EN:MD	Management approach: energy, water, materials, biodiversity, emissions, effluents, and waste	- The Group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations. https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx - Also note our <i>Code of Ethics</i> statement 'Commitment towards communities, society and environment': https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx	
Materials			
G4-EN1	Materials used: weight / volume	- SR: Eco-responsibility – environmental management - SR: Annual sustainability statements	35 – 38 52
G4-EN2	Percentage of recycled materials used	- SR: Eco-responsibility – environmental management - SR: Annual sustainability statements	35 – 38 52
Energy			
G4-EN3	Direct energy use within the organisation	- SR: Eco-responsibility - energy and climate; - SR: Annual sustainability statements - CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx - Latest group CDP report: https://www.cdp.net/en/search	30 – 34 52

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
G4-EN4	Energy consumption outside the organisation	- SR: Eco-responsibility - energy and climate; - SR: Annual sustainability statements - CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx - Latest group CDP report: https://www.cdp.net/en/search	30 – 34 52
G4-EN5	Energy saved due to efficiencies	- SR: Eco-responsibility – energy and climate - SR: Annual sustainability statements - CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx - Latest group CDP report: https://www.cdp.net/en/search	30 – 34 52
G4-EN6	Energy efficiency / renewable energy initiatives	- SR: Eco-responsibility – energy and climate - SR: Annual sustainability statements - CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx - Latest group CDP report: https://www.cdp.net/en/search	30 – 34 52
G4-EN6	Initiatives to reduce indirect energy consumption	- SR: Eco-responsibility – energy and climate - SR: Annual sustainability statements - CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx - Latest group CDP report: https://www.cdp.net/en/search	30 – 34 52
Water			
G4-EN8	Total water withdrawal by source	SR: Eco-responsibility – environmental management	35 – 38
G4-EN9	Water sources significantly affected by withdrawal of water	The group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations	
G4-EN10	Percentage and total water volume of water recycled and reused	https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx - Due to the nature of MTN's business and the products and services offered, this indicator is not material. However, as part of the maintaining the ISO 14001 certifications in Cyprus and South Africa, this aspect is addressed. Other operations, while not ISO 14001 certified, maintain safety health and environmental policies, and as part of business plans, all MTN countries of operation are required to identify environmental risks as a focus area in terms of the group's principal risks. A number of MTN operations are currently implementing the group Green Office toolkit, for water saving opportunities at offices and similar premises	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
Biodiversity			
G4-EN11	Location and size of land owned, leased or managed in biodiversity-rich habitats	- SR: Eco-responsibility – environmental management - The group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations - Networks and environment – https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx	35 – 38
G4-EN12	Impacts of operations on areas of high biodiversity value		
G4-EN13	Habitats protected or restored		
G4-EN13	How are impacts on biodiversity being managed?		
G4-EN14	Number of conservation list species affected by operations		
Emissions, effluents and wastes			
G4-EN15	Total direct and indirect greenhouse gas emissions by weight	SR: Eco-responsibility – energy and climate	30 – 34
G4-EN16		- SR: Annual sustainability statements - CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx https://www.cdp.net/en/search	52
G4-EN17	Other relevant indirect greenhouse emissions by weight	- SR: Eco-responsibility – energy and climate - SR: Annual sustainability statements - CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx https://www.cdp.net/en/search	30 – 34 52
G4-EN19		Initiatives to reduce greenhouse gas emissions and reductions achieved	- SR: Eco-responsibility – energy and climate - SR: Annual sustainability statements - CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx https://www.cdp.net/en/search
G4-EN20	Emissions of ozone-depleting substances by weight	- CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx https://www.cdp.net/en/search	
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	SR: Eco-responsibility – environmental management	35 – 38
		SR: Annual Sustainability Statements 51 – 54	52

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
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 electronic and electrical waste (e-waste or WEEE). In South Africa, e-waste is processed locally to the greatest possible extent, by MTN's e-waste handlers. MTN's fractions are ultimately mixed with e-waste from other companies and sources, and we are not aware of the weight of fractions shipped internationally. Short-term public awareness and e-waste collection campaigns resulting in collection and shipping of e-waste from Benin and Ivory Coast to South Africa in the past have been subject to the Convention. Local e-waste management in partnership with recyclers will commence in Ivory Coast in 2018. Supplier take-back agreements are in place in Cameroon, and safe disposal guidelines for batteries have been implemented in Iran. A public private partnership addressing extended producer responsibilities has been developed in Nigeria. For tonnage, see references below - SR: Eco-responsibility – environmental management - SR: Annual sustainability statements	35 – 38 52
G4-EN26	Water discharge impacts on biodiversity and water bodies	Networks and environment: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx	
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 9,6 GtCO₂e or 16,5% of global outputs by 2020. Although our solutions in this domain are relatively small, opportunities are growing rapidly. See reference links below: - SR: Sustainable economies – powering communications and IoT - See case studies at https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/default.aspx	14 – 16 and 26 – 27
G4-EN28	Percentage of reclaimed products / packaging materials	- SR: Eco-responsibility – environmental management - SR: Annual sustainability statements	35 – 38 52
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	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
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 and reported. - SR: Eco-responsibility – energy and climate - SR: Annual sustainability statements - CDP report: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Reports.aspx - Latest group CDP report: https://www.cdp.net/en/search	30 – 34 52
Overall			
G4-EN31	Environmental protection expenditure	- The group applies the precautionary principle towards environmental management, and our operations are compliant to national laws and regulations. https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx - IR: Governance – Social and Ethics Committee - Networks and environment: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx - Mobiles and health: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx	62
LABOUR PRACTICES AND DECENT WORK			
Disclosure on management approach			
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 of various aspects are submitted to the Group Chief Human Resources Officer. Annual performance is presented in the Group's UN Global Compact Communication of Progress report - SR: The workplace - UN GC: Labour	47 – 49 32 – 35
Employment			
G4-LA1	Employee numbers	- IR: Our people – Overview of our people - Partial information is available, as indicated in the SR: Annual sustainability statements	80 53
G4-LA1	Employee turnover	- IR: Our people – Overview of our people - Partial information is available, as indicated in the SR: Annual sustainability statements	80 53

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
G4-LA2	Full-time employee benefits not provided to temporary / part-time employees	IR: Remuneration report	82 - 95
Labour/Management relations			
G4-LA	Percentage unionised employees	SR: Annual sustainability statements for 2017	51
G4-LA4	Minimum notice period/s regarding significant operational changes	Employees are notified as soon as possible of restructuring processes within the organisation if considered. This follows a consultation processes. Once an employee has been confirmed for retrenchment, 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 very generous retrenchment policy relative to severance pay	
Occupational health and safety			
G4-LA5	Employee representation in health and safety committees	Not available	
G4-LA6	Total number of work-related fatalities, rates of injury, occupational diseases, lost days and absenteeism	SR: Sustainable societies - the workplace Annual Sustainability Statements 51 - 54 Occupational diseases are not a feature of our business, given the nature of products and services offered. Data on lost days are not available, but deemed not material due to the low rate of workplace-related accidents / incidents / injuries	47 - 49 51
G4-LA7	Employee wellness programmes regarding serious diseases	MTN Group has partnered with ICAS, an international risk management services as our employee wellness provider who assists on various issues but mainly counselling as the first phase of issue management. Wellness for serious diseases is also done through the medical aid.	
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	- Practices in accordance with the relevant occupational health and safety legislation in the various operations. - The MTN Academy e-learning system hosts occupational health and safety programmes accessible to all employees; where relevant, specific courses are made compulsory and completion is tracked through a workflow process.	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
Training and education			
G4-LA9	Average hours of training per employee per year	- SR: Annual sustainability statements - Employees are actively encouraged to improve their capabilities and skills through extensive training available digitally, face-to-face and from other sources supplied by the MTN Academy and from external accredited and reputable organisations. MTN Academy compiles regular internal reports for management on the nature of training undertaken by employees, amount of time spent on each module, and completion 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. Employees contract on identified development areas during their performance appraisals.	51 – 54
G4-LA10	Employee skills and training programmes	- UN GC: Labour – talent development - SR: Annual sustainability statements - IR: Our people – Developing our talent - As part of our training and development initiative we offer courses to our employees in the following disciplines: business acumen, commercial, leadership and behavioural, organisation development and technology. An average of 14 online learning programmes were completed per employee. - Discipline-specific e-learning catalogues are also in use, e.g. telecoms e-learning, ethics, corporate governance, compliance, etc. - We provide talent management learning solutions that ensure that we continue to attract, retain and develop the talents of our employees. Our global talent standards are structured to take into account the technical and behavioural requirements for each position, level of work and functional area in our organisation.	34 51 – 54 79; 81
G4-LA11	% employees receiving performance reviews and career development	- IR: Our people – Performance management - SR: Annual sustainability statements	81 51
Diversity and equal opportunity			
G4-LA12	Composition of governance bodies	- IR: Governance, people and remuneration - SR: Annual sustainability statements	58 – 59 51
G4-LA13	Ratio of basic salary of men to women by employee category	MTN appoints employees through a fair process that is based on human resource policies and procedures. Remunerations decisions are subject to these policies and procedures which are applicable to males and females. Remuneration is determined by position, skills, expenses, qualifications and affordability. No reports on equal remuneration for men and women are available.	
G4-LA15	Return to work and retention rates after parental leave, by gender	The MTN Group does not currently report against this indicator.	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
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 • Digital Human Rights: https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx • https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx • MTN Group adheres to specifications of the <i>International Labour Organisation</i> 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.	41 – 46
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	
Non-discrimination			
G4-HR3	Number of incidents of discrimination and action taken	• No incidents of discrimination were reported • In the Group-wide ethics risk assessment conducted by The Ethics Institute the survey specifically probed prevalence of discrimination as an ethics risk. Consolidated Group-wide results (all operations) indicated discrimination as a low ethics risk. Group-wide Ethics Risks Assessment is scheduled for 2019 to determine progress. • 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 providing the services they had contractually agreed to.	
Freedom of association and collective bargaining			
G4-HR4	Any incidents where freedom of association / collective bargaining was at risk? Actions taken?	• Employees are free to associate socially, politically, religiously or otherwise, as well as join any bargaining council, without fear of victimisation. Our code of ethics enables us to correctly manage situations where an employee may infringe on these rights.	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
Child Labour			
G4-HR5	Any incidents of child labour and measures taken?	- MTN Group adheres to specifications of the <i>International Labour Organisation</i> 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. https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2013_Digital_Human_Rights.pdf	
Forced and compulsory labour			
G4-HR6	Any incidents of forced labour and measures taken?	No incidents	
Security practices			
G4-HR7	Percentage of security personnel trained in human rights	Due to the nature of MTN's business, this indicator is not applicable	
Indigenous rights			
G4-HR8	Any incidents where indigenous people's rights were violated and measures taken?	- MTN Group adheres to specifications of the <i>International Labour Organisation</i> 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. https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Digital-human-rights_hi.pdf	
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	Not available	
SOCIETY			
Disclosure on management approach			
SO:MD	Management approach: community, corruption, public policy, anti-competitive behaviour and compliance	- SR: Digital human rights https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/our-code-of-ethics.aspx https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/governance-and-management.aspx https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/responsibility-for-ethics.aspx https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_%20Mobile_and_Health.pdf https://www.mtn.com/en/mtn-group/social-investments/our-focusareas/Pages/our-focus-areas.aspx	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
Community			
G4-SO1	Percentage of operations with local community engagement, impact assessments, and development programs.	• Digital human rights: SR: Sustainable societies – digital human rights • 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	41 - 46
Corruption			
G4-SO3	Total number and percentage and of operations assessed for risks related to corruption and the significant risks identified	• All MTN operations participate in the MTN group-wide ethics risk assessment, which is conducted independently every three years by The Ethics Institute. The next ERA will be conducted in 2019. Annually, a group-wide culture audit is conducted that includes a corporate integrity as well as a values dimension. The results of these two indexes provide insight into the efficacy of ethics risk management efforts. To ensure that high ethics risks are tracked as part of the key risks according to the MTN Group enterprise risk management (ERM) methodology, ethics risk was included in the MTN corporate risk register as from 2017. Mitigation of key ethics risks was reported to the group board's Social and Ethics Committee in every quarter. The impact of ethics risk management interventions is monitored through the analysis of trends in the corporate integrity as well as the values index within MTN's annual group-wide culture audit. Findings indicated a year-on-year improvement in employee perception of corporate integrity and values. This positive year-on-year trend in these two dimensions has been sustained since 2014. The improvement is deemed statistically significant by Willis Towers Watson, who independently conducts the MTN GCA • https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/governance-and-management.aspx • IR: Our approach to risk management	76 - 78
G4-SO4	Communication and training on anticorruption policies and procedures	• IR: Governance; our approach to risk • UN GC: Anti-corruption	76 - 78 39 - 42
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	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
Public policy			
G4-SO6	Engagement in public policy	For us at MTN, the approach to public policy engagement must be agile and fluid. Given the rapid pace at which the industry is changing, it is important that we are ahead of the curve when it comes to changes in the public policy universe. We do this in many ways: - o Via various board committees and working groups in the GSMA: MTN Group is represented both at the GSMA board level and at the chief policy and regulatory officers group (CPROG) by the group president and CEO and the chief regulatory and corporate affairs officer respectively. Each of these bodies provide strategic insights and critical input opportunities for various studies, global research projects and standardisation efforts across the industry - o In the last year, a function dedicated to public policy and regulatory governance was created within the group regulatory and corporate affairs division. Within this function is the role for research and policy management which is mainly responsible for proactively identifying important policy developments, changes and trends that may affect the business across our various markets - o We continue to take a rigorous approach to engaging with regulatory and legislative bodies who invite us to provide commentary and engage in public consultations. We also ensure that each of our MTN operations are able to engage directly with their authorities at critical points in the policy cycle to ensure sufficient opportunity for crafting public policy with the relevant stakeholders in a way that can create shared value - o Finally, the rise of digital services requires a more nuanced approach to public policy and subsequent regulation that emerges from this. For this reason, we are engaging with multiple industry associations, international and regional bodies as well as other stakeholders on policy directions that are mutually beneficial to customers and service providers of digital solutions • Social and ethics statement https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx	
G4-SO6	Financial / in-kind contributions to political parties	• No political contributions made	
Anti-competitive behaviour			
G4-SO7	Number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	• We have historically reported on the status and results of the lawsuit by Turkcell against MTN Group Limited and other companies in the group. Please refer to https://www.mtn.com/en/mtn-group/press-and-insights/press-releases/Pages/default.aspx for updated information	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
Compliance			
G4-SO8	Monetary value of significant fines and number of non-monetary sanctions for non-compliance with regulations	Not available	
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	- SR: Eco-responsibility https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Networks-and-the-environment_hi.pdf	28 – 38
PRODUCT RESPONSIBILITY			
Disclosure on management approach			
G4-PR:MD	Management approach: customer health and safety, product and service labelling, marketing communications, customer privacy, and compliance.	- Group positions on mobiles and health: https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Mobiles-and-health_hi.pdf - MTN operations maintain terms, conditions on service and legal content on the local website for the operations. These terms and conditions may also include any additional information useful to subscribers, such as activation agreements, transfer procedures, defective goods and technical fault reporting, personal information management, and more. Some aspects of customer terms and conditions are often also separately detailed for different types of value-add and internet services, phones and devices, etc. Terms and conditions of service for physical products such as mobile handsets and tablets may also be included in the product pack. In some countries, all MTN stores display MTN's commitments to consumer rights and complaints mechanisms including contact details of regulatory authorities. Product and service labelling may also be subject to additional communication, disclosure or other requirements as set out by national consumer protection regulations in each of the countries where we operate. Customer complaint and feedback services are available through walk-in service and other centres, and via voice, e-mail, social media and other digital channels.	
Customer health and safety			
G4-PR1	Life cycle stages of products / services assessed for health and safety impacts: incl. % of products / services assessed	- Group positions on mobiles and health: https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Mobiles-and-health_hi.pdf - Regarding the position paper above, all handsets must be certified for safety before national regulators will allow distribution. The number of network sites assessed for health and safety impacts with respect to safe levels of electromagnetic fields varies for each country of operation, and is subject to requirements set out by the national telecommunications regulator	

G4 Disclosure #	UNGC reporting requirement	MTN's Response (Document, section or information on www.mtn.com)	Page(s)
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	
Product and service labelling			
G4-PR3	Product / service information required by procedures	The types of products and services offered by each of our operations may vary from country to country, and this information is therefore not available in a consolidated format at the group reporting levels. Some of our operations may maintain this information on their local websites. Please refer to the references as indicated in G4-HR4	
G4-PR3	Incidents of regulatory non-compliance concerning product and service information labelling	None	
G4-PR5	Customer satisfaction practices: surveys etc.	IR: How we sustain value using the six capitals	14
Marketing communications			
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	
Customer privacy			
G4-PR8	Incidents of substantiated breaches of customer privacy and losses of customer data	Not available	

HUMAN RIGHTS

Principle 1: Human Rights

Businesses should support and respect the protection of internationally proclaimed human rights

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

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

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 - The MTN Supplier Code of Conduct sets out MTN's approach to ethical and sustainable business practices and stating its requirement for suppliers to embrace this commitment. The code defines minimum standards in 5 domains that MTN suppliers, their employees and subcontractors must adhere to when conducting business with MTN. The standards describe the company's expectations in terms of: Ethics; Labour and Human Rights; Health, Safety and Environment; and Management Systems. Acknowledgement of and adherence to the Supplier Code is a prerequisite for working with MTN. 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

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 % - The MTN Group is compliant with the ILO child labour minimum age specification.
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: Annual sustainability statements – 51 - 54 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. A small minority of the local staff base across the Group comprises expatriate members - Sustainability report: Annual sustainability statements – 51 - 54

	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 Statements 51 - 54 G4-LA11: PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS, BY GENDER AND BY EMPLOYEE CATEGORY - Sustainability Report: Annual Sustainability Statements 51 - 54 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: Governance, people and remuneration - 56 - 99 - Sustainability Report: Annual Sustainability Statements 51 - 54 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 - None reported. - Discrimination was identified as a low ethics risk in the group-wide ethics risk assessment ('Global Corporate Integrity Survey') conducted across all MTN operations.
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 - SR: Energy and climate – 30 - 34 - Latest Group CDP Report: https://www.cdp.net/en/search 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 - environmental management 35 - 39 - Sustainability Report: Annual Sustainability Statements 51 - 54

Aspect: Energy**G4-EN3: ENERGY CONSUMPTION WITHIN THE ORGANIZATION**

- Sustainability Report: Eco-responsibility - energy and climate - 30 - 34
- Sustainability Report: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

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.

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

- SR: Eco-responsibility - energy and climate - 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

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

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

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

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

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

- <https://www.cdp.net/en/search>

G4-EN21: NO_x, SO_x, 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 economic value - 10 - 27
- <https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Case-studies.aspx>

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

- SR: Eco-responsibility - environmental management - 35 - 39
 - SR: Annual Sustainability Statements 51 - 54
 - MTN position paper: Mobiles and Health:
https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Mobiles-and-health_hi.pdf
 - MTN position paper: Networks and the environment:
https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Networks-and-the-environment_hi.pdf
-

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.

- SR: Eco-responsibility - environmental management – 35 - 39
- SR: Annual Sustainability Statements 51 – 54

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 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

G4-EN4: ENERGY CONSUMPTION OUTSIDE OF THE ORGANIZATION

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

G4-EN5: ENERGY INTENSITY

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

G4-EN6: REDUCTION OF ENERGY CONSUMPTION

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

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

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

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 maintaining the ISO 14001 and LEED certifications for MTN South Africa, responsible water management and use is addressed. Other operations 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 have implemented the Group Green Office toolkit, for water saving opportunities at offices and similar premises.
- SR: Eco-responsibility - environmental management – 35 - 39

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 – 35 – 39
- MTN position paper: Networks and the environment:
https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Networks-and-the-environment_hi.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.
- MTN position paper: Networks and the environment:
https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Networks-and-the-environment_hi.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.
- MTN position paper: Networks and the environment:
https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Networks-and-the-environment_hi.pdf

Aspect: Emissions

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

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

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

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

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

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

G4-EN18: GREENHOUSE GAS (GHG) EMISSIONS INTENSITY

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

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

- SR: Eco-responsibility - energy and climate 30 - 34
- SR: Annual Sustainability Statements 51 - 54
- <https://www.cdp.net/en/search>

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/search>

G4-EN21: NO_x, SO_x, 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: Sustainable economic value - 16
- SR: Sustainability value statement (page 30-32)

G4-EN24: TOTAL NUMBER AND VOLUME OF SIGNIFICANT SPILLS

No significant spills were reported by MTN operations

- SR: Eco-responsibility – 29 - 38
- SR: Annual Sustainability Statements 51 - 54

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 electronic and electrical waste (e-waste or WEEE). In South Africa, e-waste is processed locally to the greatest possible extent, by MTN's e-waste handlers. MTN's fractions are ultimately mixed with e-waste from other companies and sources, and we are not aware of the weight of fractions shipped internationally. Short-term public awareness and e-waste collection campaigns resulting in collection and shipping of e-waste from Benin and Ivory Coast to South Africa in the past have been subject to the Convention. Local e-waste management in partnership with recyclers will commence in Ivory Coast in 2018. Supplier take-back agreements are in place in Cameroon, and safe disposal guidelines for batteries have been implemented in Iran. A public private partnership addressing extended producer responsibilities has been developed in Nigeria. For tonnage, see references below
- SR: Eco-responsibility – environmental management – 35 - 38
- SR: Annual sustainability statements - 52

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

- https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Networks-and-the-environment_hi.pdf

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 9,6 GtCO₂e or 16,5% of global outputs by 2020. Although our solutions in this domain are relatively small, opportunities are growing rapidly. See reference links below
- SR: Sustainable economies – powering communications and IoT – 14 – 16 and 26 – 27
- https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Networks-and-the-environment_hi.pdf

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

- SR: Eco-responsibility – environmental management – 35 - 38
- SR: Annual sustainability statements – 52

	Aspect: Compliance G4-EN29: MONETARY VALUE OF SIGNIFICANT FINES AND TOTAL NUMBER OF NONMONETARY SANCTIONS FOR NON-COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS • Not available 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 30 - 34 • SR: Annual sustainability statements – 52 • https://www.cdp.net/en/search Aspect: Overall G4-EN31: TOTAL ENVIRONMENTAL PROTECTION EXPENDITURES AND INVESTMENTS BY TYPE • SR: Eco-responsibility – environmental management – 35 – 38 • MTN position paper: Mobiles and Health: https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Mobiles-and-health_hi.pdf • MTN position paper: Networks and the environment: https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Networks-and-the-environment_hi.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 - 30-34 • SR: Annual sustainability statements - 52 • Latest group CDP report: https://www.cdp.net/en/search G4-EN7: REDUCTIONS IN ENERGY REQUIREMENTS OF PRODUCTS AND SERVICES • SR: Energy and climate - 30 – 34 • SR: Annual sustainability statements - 52 • Latest group CDP report: https://www.cdp.net/en/search

	Aspect: Emissions G4-EN19: REDUCTION OF GREENHOUSE GAS (GHG) EMISSIONS - SR: Eco-responsibility – energy and climate 30 - 34 - SR: Annual sustainability statements – 52 - Latest CDP report: https://www.cdp.net/en/search 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 9,6 GtCO₂e or 16,5% of global outputs by 2020. Although our solutions in this domain are relatively small, opportunities are growing rapidly. See reference links below: - SR: Sustainable economies – powering communications and IoT - See case studies at https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/default.aspx Aspect: Overall G4-EN31: TOTAL ENVIRONMENTAL PROTECTION EXPENDITURES AND INVESTMENTS BY TYPE - SR: Eco-responsibility – environmental management – 35 – 38 - MTN position paper: Mobiles and Health: https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Mobiles-and-health_hi.pdf - MTN position paper: Networks and the environment: https://www.mtn.com/MTN%20Service%20detail%20Document%20library/Networks-and-the-environment_hi.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. - IR: Our values - 2 - SR: About this report - 2 https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/default.aspx https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/Ethics-policy-positions.aspx https://www.mtn.com/en/mtn-group/sustainability/cases-and-library/Pages/Document-library.aspx 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 with whom the company has organisational membership; this partnership is crucial for ethics advice required at a systemic level. - Annually a perception-based, anonymous organisation climate / culture survey is conducted across the group of companies, with Values and Corporate Integrity being two of the 16 dimensions probed.

- 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 29 certified Ethics Officers (registered with the Ethics Institute of South Africa) from across various organisational disciplines, e.g. Procurement, Business Risk Management, Finance (Group Tax), Legal and HR who provide assistance and advice at both personal as well as at 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.

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 Executive Risk and Compliance), or the whistleblowing line (Tip-offs Anonymous (anonymous@tip-offs.net)).
- An ethics advice / help-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) in 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

- All MTN operations participate in the ethics risk assessment, which is conducted independently every three years. Annually, a group-wide culture audit is conducted that includes a **corporate integrity** as well as a **values** dimension. The results of these two indexes provide insight into the efficacy of ethics risk management efforts. To ensure that high ethics risks are tracked as part of the key risks according to the MTN Group enterprise risk management (ERM) methodology, ethics risk was included in the MTN corporate risk register as from 2017. Mitigation of key ethics risks was reported to the group board's Social and Ethics Committee in every quarter. The impact of ethics risk management interventions is monitored through the analysis of trends in the corporate integrity as well as the values index within MTN's annual group-wide culture audit. Findings indicated a year-on-year improvement in employee perception of corporate integrity and values. This positive year-on-year trend in these two dimensions has been sustained since 2014. The improvement is deemed statistically significant by Willis Towers Watson, who independently conducts the MTN GCA
- <https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/governance-and-management.aspx>
- IR: Our approach to risk management – 76 - 78

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

- IR: Our approach to risk management – 76 – 78

G4-SO5: CONFIRMED INCIDENTS OF CORRUPTION AND ACTIONS TAKEN

- Due disciplinary processes are followed to investigate and resolve matters of ill-discipline including corruption. Sanctions may range from warnings to termination of employment

Disciplinary sanctions enforced in 2017:

Written warnings	32%
Final written warnings	25%
Verbal warnings	15%
Suspensions	10%
Dismissals	8%
Counselling	1%
Not guilty	1%
Pending	4%

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 2017.
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