



MTN position statement

Political contributions

Introduction

MTN, as a leading pan-African mobile operator, is cognisant of the responsibilities and challenges associated with operating in markets with diverse political and socio-economic environments. We endeavour to participate openly and transparently in all jurisdictions and with all stakeholders, including in our work with our nation-state hosts. The sustainability of our business is intrinsically linked to the stability and prosperity of the societies we serve. A commitment to healthy, informed democratic values and good governance underpins our corporate engagement with political entities.

Understanding that political parties are central to the democratic process, MTN has adopted a policy on political contributions that aims to support democracy through opportunities for 'in-kind donations' in the form of services provided in our ordinary course of business. To mitigate the dangers of corruption, the policy very clearly states that MTN does not make cash donations to political parties.

The policy expresses our commitment to ethical corporate citizenship, constructive discourse, transparency, integrity, and social responsibility. It is aligned with local regulations and international standards.

Purpose

Our policy and compliance principles define MTN's position on political contributions, and ensure that all engagements with political parties align with our corporate values, legal obligations, and international principles, including the Ten Principles of the UN Global Compact.

MTN's approach

The following standards and policies guide us:

- King IV Report on Corporate Governance for South Africa - Principle 2: The governing body should govern the ethics of the organisation in a way that supports the establishment of an ethical culture.
- King IV Report on Corporate Governance for South Africa - Principle 3: The governing body should ensure that the organisation is, and is seen to be, a responsible corporate citizen.
- MTN Group Conduct Passport.
- MTN Group Gifts, Hospitality and Entertainment Policy.
- MTN Group Anti-Bribery and Corruption Policy.
- MTN Group Stakeholder Management Policy.
- MTN Group Corporate Social Responsibility Policy.

Key principles

MTN's approach to political contributions is anchored in principles that reflect our corporate values and commitment to ethical conduct:

- Democratic processes are fundamental to societal development and stability.
- We believe in the transformative power of corporate entities in society. Acknowledging that political parties need resources to fulfil their



democratic purpose, our policy is designed to support well-capacitated multi-party-political systems.

- We do not make cash donations to political parties. However, we offer limited 'in-kind' donations in the form of goods and services provided in the ordinary course of business. These are offered to political parties in the countries in which we operate, in line with domestic legislation where it exists.
- All political parties in the national legislature of eligible countries can receive in-kind donations, the value of which is proportional to the seats each occupies in the legislature. This is subject to an authorised limit.
- Our contributions are non-partisan and aim to strengthen multi-party democracy. Contributions may be withheld where there is a risk of reputational damage or other undue risks to MTN.
- MTN is committed to accountability and transparency. We seek to disclose in-kind donations annually and ensure that such disclosures comply with relevant laws. We will maintain a 'Political Contributions and Donations Register' and publish it in our annual suite of reports available on our website.
- The highest standards of ethical conduct guide our engagements. We have zero tolerance for corruption and ensure our contributions do not compromise our values and reputation.
- As an industry leader, we strive to set an example through our corporate governance. We ensure that our engagements with political parties are conducted with utmost professionalism and adherence to best practice.
- We ensure that, at a minimum, all our engagements and any form of political contribution comply with the laws and regulations of the countries in which we operate. In certain instances, we will enforce additional procedural and disclosure requirements to ensure that we adhere to the highest standards possible.
- We maintain a non-partisan stance in our political engagements, ensuring that our in-kind support of political parties is unbiased and aimed solely at strengthening democratic institutions. We do not seek to influence, benefit, or gain any competitive advantage in providing political contributions.
- We take all reasonable steps to prevent the MTN name or logo from being used for any political purposes whatsoever by beneficiaries.
- We respect the rights of our employees to engage in political activities in their personal capacity. However, such engagements must be clearly separated from their association with MTN.

Roles and responsibilities

Our Board – through the Group Social, Ethics and Sustainability Committee – oversees the Group's actions and performance regarding political contributions. The Group's Executive Committee is responsible for policy implementation, driven by the Group Sustainability and Corporate Affairs function.

**Applicability**

MTN Group, all its operating companies, all MTN employees, directors and representatives in all territories.

Communication and training

The policy is shared with employees of MTN's operating companies, subsidiaries and partners. It is translated into local languages as required. Detailed training is provided for various functional, business operations.