MTN Group Limited

United Nations Global Compact Annual Communication Of Progress (COP) for the year ended 31 December 2016

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

We welcome feedback on its contents.

About the MTN Group

Who we are

MTN is a leading emerging markets mobile operator at the forefront of global technological changes. From our headquarters in Johannesburg and guided by our values, we are delivering a bold, new Digital World to our 240 million customers across Africa and the Middle East.

In just over two decades, through our extensive investment in advanced communication infrastructure and by harnessing the talent of our people, we have grown rapidly to offer voice, data and digital services to retail customers in 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 R238 billion at the end of December 2016 we were the twelfth largest company on the Johannesburg Stock Exchange.
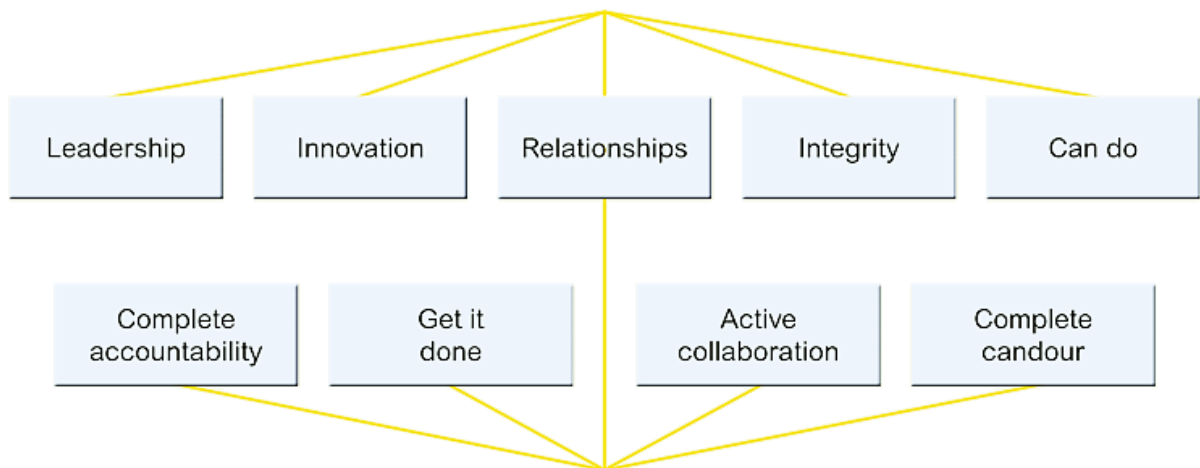
Our vision

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

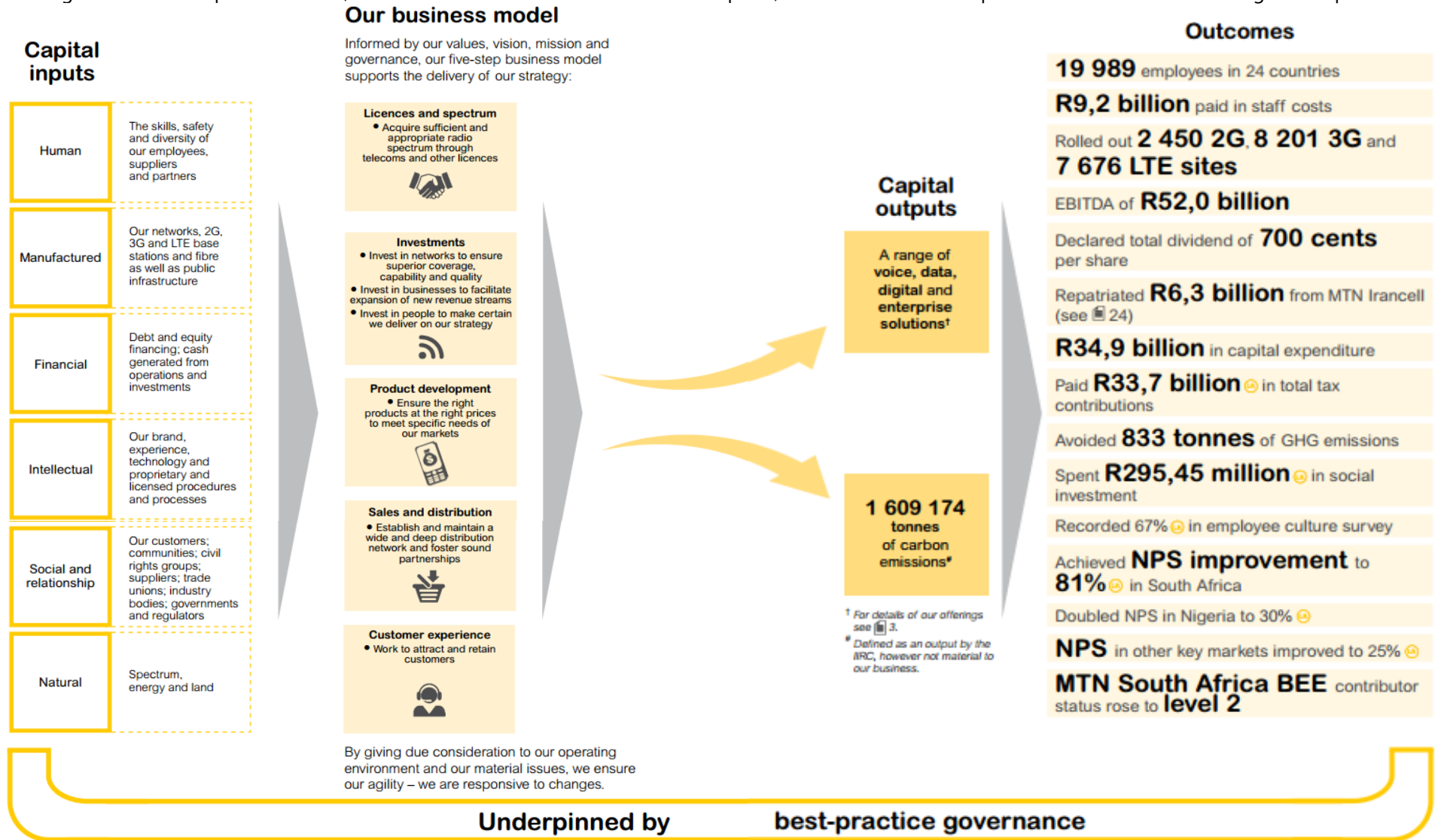## Our mission

To make our customers' lives a whole lot brighter.

Our values

| Leadership | Innovation | Relationships | Integrity | Can do |

| Complete accountability | Get it done | Active collaboration | Complete candour |

Our vital behaviours

How we create value

We create value by developing and distributing a range of innovative and reliable communication products and services. We depend on various relationships and resources, known as the six capitals, to do this. To deliver on our strategy, as well as generate value for all stakeholders, we require inputs of each capital. When making decisions on capital allocation, we consider the trade-offs between the capitals, and seek to maximise positive outcomes and curb negative impacts.

Our business model

Capital inputs

Human	The skills, safety and diversity of our employees, suppliers and partners
Manufactured	Our networks, 2G, 3G and LTE base stations and fibre as well as public infrastructure
Financial	Debt and equity financing; cash generated from operations and investments
Intellectual	Our brand, experience, technology and proprietary and licensed procedures and processes
Social and relationship	Our customers; communities; civil rights groups; suppliers; trade unions; industry bodies; governments and regulators
Natural	Spectrum, energy and land

Informed by our values, vision, mission and governance, our five-step business model supports the delivery of our strategy:

Licences and spectrum
- Acquire sufficient and appropriate radio spectrum through telecoms and other licences

Investments
- Invest in networks to ensure superior coverage, capability and quality
- Invest in businesses to facilitate expansion of new revenue streams
- Invest in people to make certain we deliver on our strategy

Product development
- Ensure the right products at the right prices to meet specific needs of our markets

Sales and distribution
- Establish and maintain a wide and deep distribution network and foster sound partnerships

Customer experience
- Work to attract and retain customers

By giving due consideration to our operating environment and our material issues, we ensure our agility – we are responsive to changes.

Capital outputs

A range of voice, data, digital and enterprise solutions†

1 609 174 tonnes of carbon emissions#

† For details of our offerings see 3.
# Defined as an output by the IIRC, however not material to our business.

Outcomes

19 989 employees in 24 countries

R9,2 billion paid in staff costs

Rolled out **2 450 2G**, **8 201 3G** and **7 676 LTE sites**

EBITDA of **R52,0 billion**

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

Repatriated **R6,3 billion** from MTN Irancell (see 24)

R34,9 billion in capital expenditure

Paid **R33,7 billion** in total tax contributions

Avoided **833 tonnes** of GHG emissions

Spent **R295,45 million** in social investment

Recorded **67%** in employee culture survey

Achieved **NPS improvement** to **81%** in South Africa

Doubled NPS in Nigeria to 30%

NPS in other key markets improved to 25%

MTN South Africa BEE contributor status rose to **level 2**

Underpinned by **best-practice governance**

Contents

MTN Group Limited

Statement of Recommitment to the UNGC

Phuthuma Nhleko
Group executive chairman

To our stakeholders

There can be little doubt that the last 18 months have been the most difficult period in MTN's 22-year history. We faced unprecedented challenges, precipitated by regulatory, macro-economic, political and competitive forces in our two largest markets, and to varying degrees across our portfolio.

With deeper senior management capacity and skills in place, including the appointment of a Group CEO, the board conducted a deep and fundamental strategic review of the business and its processes. The review illuminated a number of issues in need of attention and affirmed the Group's unique strategic advantages on which we can continue to build a sustainable business for the future. This precipitated our business transformation initiative, IGNITE, which sets out a clear roadmap for the next 18 months. There is still much to be done to transform the Group and position it for the future, but also much to look forward to for the people and stakeholders of MTN.

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

In our 2016 annual Communication of Progress we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Phuthuma Nhleko

Chairman of the Board/
Acting Group President and CEO
MTN Group Limited

▟ Scope of the COP

Materiality and stakeholder inclusiveness

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

This report marks the fourth year of our UNGC Communication of Progress reporting, and 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. In our 2016 annual Communication of Progress we describe our actions to integrate the Global Compact and its principles into our business strategy and operations. The MTN Group communication of progress covers operations in Afghanistan, Benin, Cameroon, Congo-Brazzaville, Cyprus, Guinea-Bissau, Guinea-Conakry, Ghana, Iran, Côte d'Ivoire, Liberia, Nigeria, Rwanda, South Africa, Sudan, South Sudan, Swaziland, Syria, Uganda, Yemen and Zambia, as well as MTN Enterprise operations in Kenya and Namibia.

Determining material issues

Material issues refer to matters that have an impact on our ability to remain commercially viable and socially relevant to our stakeholders. The material issues important to MTN's sustainability are determined by reviewing the issues most important to our stakeholders, and the impact of these issues on the achievement of our business objectives. Material issues are prioritised according to the scale and nature of impact on business operations, economic performance and interests of our stakeholder groups.

⊕ www.mtn.com; www.mtn.com/sustainability; www.mtn.com/investors

💼 Case study on www.mtn.com/sustainability

📝 MTN Group positions on www.mtn.com/sustainability

(GRI) UN Global Reporting Initiative

(SR) Sustainability Report

(CDP) www.cdproject.net

(AFS) Annual financial statements

(GR) Governance report

(IR) Integrated report

(RR) Remuneration report

(TAX) Tax report

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Icon reference

To make for easier reading, navigation and cross-referencing tools have been included to reference relevant pages within this book and supplementary reports on line.

To determine the issues most material to MTN's sustainability, the following sources are considered:

- Feedback from all stakeholders that review the annual reports.
- Engagement with all stakeholders through the e-mail addresses sustainability@mtn.co.za and investor.relations@mtn.co.za.
- Information gained through engagements with regulatory authorities, media organisations, civil society and community-based organisations, our customers, and general members of the public.
- Feedback from engagements with the JSE SRI, the CDP, MTN's investors and financial analysts, and research organisations that consult us or assess our responsible business performance.
- Information from third-party questionnaires and assessments of our publicly reported performance by university organisations and other third parties not commissioned by MTN.
- Feedback from internal review and research processes including industry, peer and global developments, and risk and audit management processes.
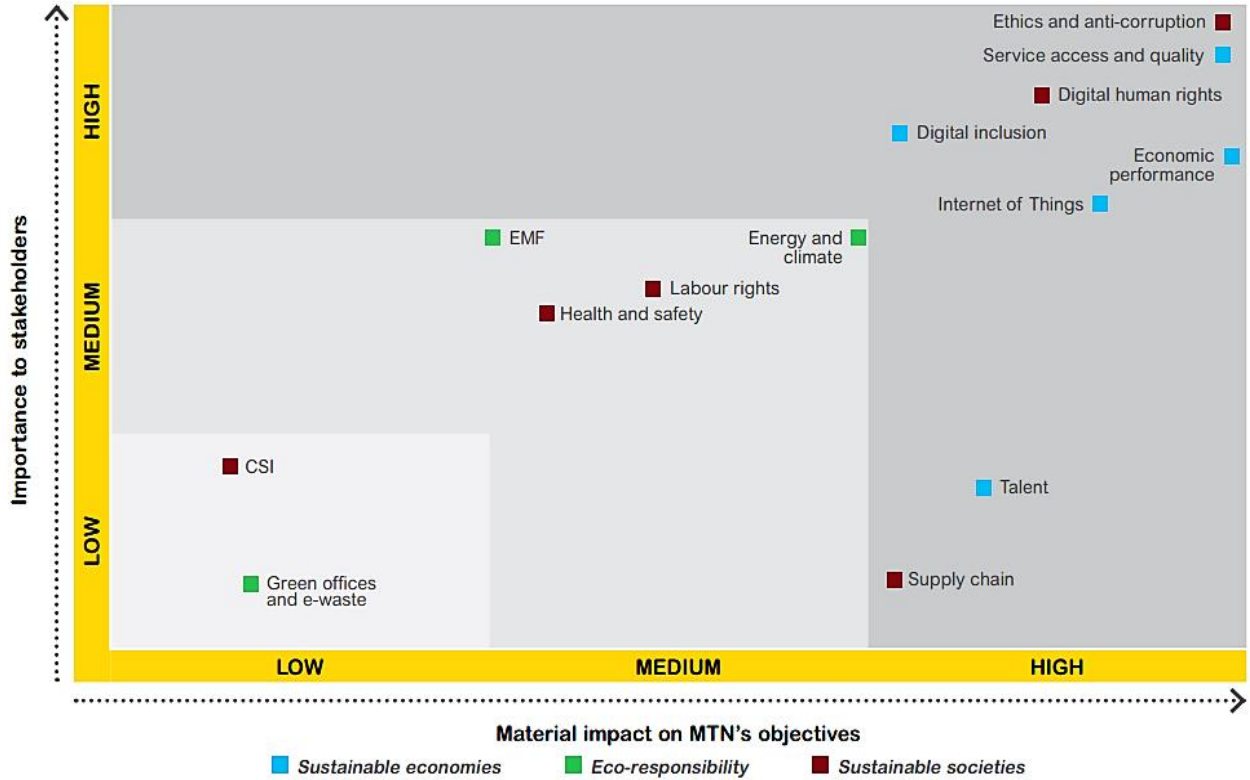
Issues identified through this process are assessed during internal materiality reviews. These issues are reviewed by the executive, the Group Social and Ethics Committee and the Group Board. This review is undertaken periodically to ensure that we are responsive and can adapt to changing operating conditions. Our material issues of focus for 2016 are set out below:

Issue	Where to find information	Issue	Where to find information
Ethics and anti-corruption	I R S R GRI G C	EMF	S R GRI
Access and quality	I R GRI	Health and safety	S R GRI
Digital human rights	I R S R GRI G C	Labour rights	S R GRI G C
Economic performance	I R GRI ⊕ www.mtn.com	Talent	GRI
Digital inclusion	S R GRI	CSI	GRI ⊕ www.mtn.com
Internet of Things	I R S R GRI ⊕ www.mtnbusiness.com	Supply chain	GRI
Energy and climate	I R S R CDP GRI G C	Green offices and e-waste	S R GRI G C

:: Sustainability context

Despite global uncertainty and the challenges faced by MTN, we are optimistic about enabling sustainable growth. By focusing on the organisational, system and process requirements needed to meet our strategic objectives, we have enhanced our ability to bring the benefits of the digital economy to our markets. Both MTN and our stakeholders have realised some of these benefits through ICT-enabled solutions that generate commissions, connect people, improve economic participation and enable social development. Cross-sectoral partnerships, catalysing local innovation and offering mobile technology solutions that address some of the service access and affordability constraints in our markets help us create shared societal value.

MTN improving sustainability in its markets in 2016

MTN's role in improving sustainability in its markets in 2016 saw us continuing to implement changes to our operating model in order to align ourselves with the growing demand for digital services and solutions in our markets. Our e-commerce partnerships are enabling our customers to enjoy access to products previously only available in more developed countries. Partnering with tower management companies, we are better able to focus on core business delivery. This also helps us and other mobile operators to reduce some of our environmental impact. By investing in the development of local content in our markets, we actively encourage mobile application developers of all ages to develop solutions that can potentially help people participate in economic opportunities and overcome constraints such as lack of access to information, health and education services, among others.

Challenges MTN faced in 2016

The challenges MTN faced in 2016 were narrowed down to those which impacted our top nine operations, ultimately affecting the Group:

- Challenging economic conditions

- Increased competition and disruption of traditional telecoms business

- Tough political environments and greater regulatory and compliance requirements

- Easing of sanctions in Iran

- Inconsistent execution of Group strategy and implementation of regulatory compliance and governance policies by operations

Actions taken to integrate sustainability into its core business activities in 2016

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

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

- We offer mobile financial services, health, education and other digital products that help narrow the digital divide between our markets and other, more developed markets.

- MTN's mobile money services have evolved from basic transfers and micro-payment services to savings and loan products.

- We actively encourage the development of digital solutions that meet the specific needs of our markets, ensuring we create shared value with the communities in which we operate.

We further met our eco-responsibility imperatives by:

- Developing IoT-based solutions to reduce negative environmental impacts.

- As we outsource our network sites, we encourage our tower management partner companies to improve energy efficiency and help MTN manage Scope 3 GHG emissions.

- Continuing to make good progress in reducing our use of paper, water and other resources and are improving our waste management practices.

We contributed to sustainable societies by:

- Enhancing our ethics management programme across the Company through training, communications and ensuring the availability of additional certified ethics officers.

- Making some progress towards achieving our digital human rights management objectives.

- Introducing progressive employee wellness solutions including flexible work policies, greater access to health services and workplace-based day-care services for employees' children were implemented in some operations.

MTN's sustainability focus for 2016

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

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

UNGC Communication of Progress for 2016

The UN GRI G4 Guidelines (which now include standard disclosures and core indicators) were used in preparation of this COP for 2016.

- *Please 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 2016
- IR: MTN Group Integrated Report 2016 (IR)
- SR: MTN Group Sustainability Report 2016 (SR)
- CDP: MTN Group Carbon Disclosure Project report 2016 (CDP)
- MTN Group website (www.mtn.com)

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page # or information on www.mtn.com)*	Page(s)
HIGH-LEVEL COMMITMENT AND STRATEGY			
G4-1	CEO statement (including our continued UNGC support)	• Communication of Progress (COP) • IR: Our executive chairman's report • SR: Group executive chairman's statement	• COP 5 • IR: 23-27 • SR: 5
G4-2	Impacts, risks and opportunities	• IR: Our top risks and what we are doing about them • IR: How we are governed • SR: Energy and climate risks, mitigation and opportunities	• IR: 32-39 • IR: 55, 59, 61 • SR: 19
CONTEXT OF OPERATION AND VERIFICATION			
G4-3	Name of reporting organisation	• MTN Group Limited	
G4-4	Primary brands, products, services	• IR: What we offer • https://www.mtn.com/en/what-we-do/Pages/default.aspx	• IR: 3
G4-6	Operating structure	• IR: Who is responsible: Our executive committee • IR: Who is responsible: Management on the ground	• IR: 64-65 • IR: 66-67
G4-5	Location of Headquarters	• 216 - 14th Avenue, Fairland, 2195, Gauteng, South Africa	
G4-6	Geographic scope / map of operations	• IR: Where we operate	• IR: 4-5
G4-7	Nature of ownership and legal form	• IR: About MTN; where we operate	• IR: 2; 4-5
G4-8	Profile of customer base, markets served and sectors served	• IR: Where we operate • https://www.mtn.com/en/mtn-group/about-us/our-story/Pages/where-we-are.aspx	• IR: 4-5
G4-9	Scale of operations of the reporting organisation including number of employees and operations	• IR: About this report • SR: About this report; sustainability value add statement	• IR: Page preceding table of contents • SR: Page preceding table of contents; 30
G4-13	Changes occurring within the reporting period regarding size, structure or ownership	• The Group has materially revised its structure and leadership significantly in 2016, to improve governance, regulatory and operational oversight, management capacity, compliance, risk management and effective execution of strategy, and increase management capacity. Changes include the appointment of a high-calibre executive management team to replace or enhance existing executive management structures, the re-constitution of three vice presidential structures and the clustering of operations in Southern and Eastern Africa, Western and Central Africa, and Middle Eastern and Northern Africa regions, and of the role of a Group chief operations officer • IR: Our new compliance structure; our executive chairman's statement; our people	• IR: 7; 24; 80

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*	Page(s)
	Awards received	• • MTN Nigeria named the Most Valued Brand in the country (Top 50 Brands survey) • MTN Uganda won Digital Brand of the Year Africa (Digital Impact Awards Africa) • MTN Uganda won Best Mobile Financial Service in Uganda • MTN South Africa named Most Valuable Brand in the country (Brand Finance) • MTN South Africa won Brand of the Year in the regional tier of the World Branding Awards in the telecoms category • MTN Ghana named CSR Company of the Year (CSR Excellence Awards) • https://www.mtn.com/en/mtn-group/press-and-insights/Our-awards/Pages/default.aspx • https://www.mtn.com/en/mtn-group/social-investments/MTN-foundation-accolades/Pages/default.aspx	
Assurance			
G4-33	Process to provide independent verification for the COP / Policy on independent assurance	• IR: Summarised assurance indicators; www.mtn.com/investors/Financial-Reporting/Integrated-Reporting/pages/default.aspx • SR: Sustainability value add statement	• IR: 90 • SR: 30
Governance			
G4-34	Company's governance structure (including major committees)	• IR: How we are governed • SR: About this report; approach to sustainability	• IR: 63 • SR: Page preceding table of contents; 3
G4-39	Is the chairman also an executive officer?	• IR: How we are governed	• IR: 64
G4-40	Board profile: number, gender, Executive vs. Non-executive	• IR: How we are governed	• IR: 59
G4-49	How do stakeholders provide recommendations to Board?	• SR: Our approach to sustainability	• SR: 3
G4-51	Link between remuneration and leadership performance	• IR: Our people and their remuneration	• IR: 70-88
G4-41	Managing conflicts of interest	• IR: How we are governed	• IR: 59
G4-40	Process for determining leadership qualifications	• IR: How we are governed	• IR: 59
G4-42	Internally developed mission / value statements, principles or codes related to sustainability	• www.mtn.com/en/investors/financial-reporting/integrated-reports/ pages/default.aspx	
G4-45	Board oversight of sustainability	• IR: How we are governed • SR: Our approach to sustainability	• IR: 61 • SR: 3
G4-44	Processes for evaluating the board's sustainability performance	• Not available	
Stakeholder engagement			
G4-24	List of stakeholder groups	• IR: How we create value; relationships; our key relationships themes • SR: About this report	• IR: 10; 20; 21 • SR: Page preceding table of contents
G4-25	How are stakeholders identified?	• IR: How we create value; relationships; our key relationships themes • SR: About this report	• IR: 10; 20; 21 • SR: Page preceding table of contents
G4-26	On-going mechanisms for stakeholder engagement: who, how, what outcomes	• IR: How we create value; relationships; our key relationships themes • SR: About this report	• IR: 10; 20; 21 • SR: Page preceding table of contents
G4-27	Stakeholder concerns and how the organisation responded	• IR: How we create value; relationships; our key relationships themes • SR: About this report	• IR: 10; 20; 21 • SR: Page preceding table of contents; 2-3
-	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	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*	Page(s)
DISCLOSURES ON MANAGEMENT APPROACH			
Economic			
EC:MD	**Management approach:** economic performance, market presence and indirect economic aspects	• https://www.mtn.com/en/Investors/Pages/default.aspx	
Economic performance			
G4-EC1	Economic value added	• IR: Financial review	• IR: 41-46
G4-EC2	Climate change related financial implications, risks and opportunities	• SR: Energy and climate • https://www.mtn.com/MTN%20Service%20Detail%20Report%20 archive/MTN_Group_2016 • https://www.cdp.net/en/search	• SR: 19
G4-EC3	Defined benefit plan obligations coverage	• Not available	
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 to develop skills for the labour market beyond the company as a contribution to the socio-economic development of society.	
-	Capital investment in telecommunication network infrastructure broken down by country/region	• IR: Where we operate	• IR: 4-5
-	Net costs for MTN under the Universal Service Obligation when extending service to geographic locations and low-income groups, which are not profitable	• The MTN Group has not separately calculated or ring-fenced the net costs of extending service to geographic locations and low-income communities which are not profitable, due to the nature of the business' operations in emerging markets across Africa and the Middle East, where low-income and geographic spread of markets are a core feature of some of these markets	
Market presence			
G4-EC5	Standard entry level wage compared to local minimum wage	• Not available	
G4-EC9	Policy, practices, and proportion of spending on locally-based suppliers	• SR: Sustainability value add statement (black economic empowerment)	• SR: 31
G4-EC6	Procedures for local hiring (including senior management)	• The MTN Group hires locally as far as possible. We do not indicate expatriate members by management level. • SR: Sustainability value add statement	• SR: 30
Indirect economic impacts			
G4-EC7	Positive public impact of pro bono / donated infrastructure and services	• SR: Sustainable economic value • IR: Manufactured capital; social and relationship capital; our investment case	• SR: 7-12 • IR: 12; 17-19; 28-29
G4-EC8	Significant indirect economic impacts, including extent	• IR: How we create value • SR: Sustainability economic value; sustainable value add statement (black economic empowerment)	• IR: 10-19 • SR: 7-12; 31

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
ENVIRONMENTAL			**13**
Indirect economic impacts			
EN:MD	Management approach: energy, water, materials, biodiversity, emissions, effluents, and waste	• SR: Eco-responsibility; environmental management	• SR: 16-22
Materials			
G4-EN1	Materials used: weight / volume	• SR: Environmental management; sustainability value add statement	• SR: 20-22; 31
G4-EN2	Percentage of recycled materials used	• SR: Environmental management; sustainability value add statement	• SR: 20-22; 31
Energy			
G4-EN3	Direct energy use within the organisation	• SR: Eco-responsibility; energy and climate; sustainability value add statement • https://www.cdp.net/en/search	• SR: 16-19; 31
G4-EN4	Indirect energy use within the organisation	• SR: Eco-responsibility; energy and climate; sustainability value add statement • https://www.cdp.net/en/search	• SR: 16-19; 31
G4-EN5	Energy saved due to efficiencies	• SR: Eco-responsibility; energy and climate; sustainability value add statement • https://www.cdp.net/en/search	• SR: 16-19; 31
G4-EN6	Energy efficiency / renewable energy initiatives	• SR: Energy and climate • https://www.mtn.com/en/mtn-group/sustainability/ecoresponsibility/Pages/energy-and-climate.aspx • https://www.cdp.net/en/search	• SR: 17-19
G4-EN6	Initiatives to reduce indirect energy consumption	• SR: Energy and climate • https://www.mtn.com/en/mtn-group/sustainability/ecoresponsibility/Pages/energy-and-climate.aspx • https://www.cdp.net/en/search	• SR: 17-19
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 is addressed. In 2015, MTN Cyprus also attained ISO 14001 certification. MTN Nigeria is currently in the process of implementing the requirements necessary to achieve ISO 14001 certification. Other operations, while not ISO 14001-certified, maintain safety health and environmental policies, and as part of business plans, all MTN countries of operation are reviewing environmental risks as a focus area in terms of the Group's principal risks. A number of MTN operations are currently implementing the Group Green Office toolkit, for water saving opportunities at offices and similar premises. • SR: Environmental management	• SR: 20-22
G4-EN9	Water sources significantly affected by withdrawal of water		
G4-EN10	Percentage and total water volume of water recycled and reused		
Biodiversity			
G4-EN11	Location and size of land owned, leased or managed in biodiversity-rich habitats	The MTN Group does not currently report against this indicator	
G4-EN12	Impacts of operations on areas of high biodiversity value	• SR: Eco-responsibility • https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2016.pdf	• SR: 16
G4-EN13	Habitats protected or restored	Due to the nature of MTN's business, the Group does not report against this indicator. However, environmental impact assessments are undertaken as part of network infrastructure and facilities implementation. • https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2016.pdf	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
G4-EN13	How are impacts on biodiversity being managed?	Due to the nature of MTN's business, the Group does not report against this indicator. However, environmental impact assessments are undertaken as part of network infrastructure and facilities implementation. • https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2016.pdf	
G4-EN14	Number of conservation list species affected by operations	Due to the nature of MTN's business, this Group does not report against this indicator. However, environmental impact assessments are undertaken as part of network infrastructure and facilities implementation. • https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2016.pdf	
Emissions, effluents and wastes			
G4-EN15 G4-EN16	Total direct and indirect greenhouse gas emissions by weight	• SR: Eco-responsibility; energy and climate; sustainability value add statement • https://www.cdp.net/en/search	• SR:16-19; 31
G4-EN17	Other relevant indirect greenhouse emissions by weight	• SR: Eco-responsibility; energy and climate; sustainability value add statement • https://www.cdp.net/en/search	• SR:16-19; 31
G4-EN19	Initiatives to reduce greenhouse gas emissions and reductions achieved	• SR: Eco-responsibility; energy and climate; sustainability value add statement • https://www.mtn.com/en/mtn-group/sustainability/ecoresponsibility/Pages/energy-and-climate.aspx • https://www.cdp.net/en/search	• SR:16-19; 31
G4-EN20	Emissions of ozone-depleting substances by weight	• 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: Environmental management; sustainability value add statement	• SR: 20-22; 31
G4-EN24	Total number and volume of significant spills	• No significant spills	
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). 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. For tonnage, see references below: • SR: Environmental management; sustainability value add statement	• SR: 21; 31
G4-EN26	Water discharge impacts on biodiversity and water bodies	• Although not a material aspect for the Group, see SR: Eco-responsibility • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_Networks_and_Environment.pdf	• SR: 16; 20-22

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
Products and Services			
G4-EN27	Initiatives to mitigate environmental impacts	• The global e-Sustainability Initiative has assessed that ICT-enabled solutions can help the world achieve carbon abatements in the region of 9,6GtCO2e or 16,5% of global outputs by 2020. Although our solutions in this domain are relatively small, opportunities are growing rapidly, and include cloud computing for virtualisation and other efficiencies, and machine-to-machine products to address risks of water leakage, report on air quality composition for improvement efforts, and encouragement of energy-efficient driving by fleet drivers using our fleet management solution. • SR: Sustainable economies – transforming enterprises • https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=29 • https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=28 • https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=23	• SR: 12-13
G4-EN28	Percentage of reclaimed products / packaging materials	• SR: Environmental management; sustainability value add statement	• SR: 20-22;31
Compliance			
G4-EN29	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	• No significant fines and sanctions	
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; sustainability value add statement • https://www.cdp.net/en/search	• SR: 17-19;31
Overall			
G4-EN31	Environmental protection expenditure	• IR : How we are governed • SR: About this report; approach to sustainability • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_%20Mobile_and_Health.pdf • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_Networks_and_Environment.pdf	• IR: 63 • SR: Page preceding table of contents; 3
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 on various aspects are submitted to the Group chief human resources and corporate affairs officer as well as to the Group Board remuneration and human resources committee • IR: How we create value using the six capitals • IR: Relationships on which we rely to create value • IR: Our investment case • IR: How we are governed to create value • IR: Our people and their remuneration	•IR: 10-12; 15; 17; 18-20 •IR: 20 •IR: 29 •IR: 56-61 •IR: 68-81

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
Employment			
G4-LA1	Employee numbers	• SR: Sustainability value add statement for 2016	• SR: 30
G4-LA1	Employee turnover	• SR: Sustainability value add statement	• SR: 30
G4-LA2	Full-time employee benefits not provided to temporary / part-time employees	• IR: Our people and their remuneration	• IR: 68-81
Labour/Management relations			
G4-LA	Percentage unionised employees	• SR: Sustainability value add statement for 2016	• SR: 30
G4-LA4	Minimum notice period/s regarding significant operational changes	The Group does provide internal notification to employees regarding significant operational changes. These vary depending on the nature and scope of the change. Employees are notified as soon as a possible restructuring process within the organisation is considered. This follows a consultation process. Once an employee has been confirmed for retrenchment, s/he is given at least one month's notice. This notice period may even be longer than one month, as determined by the various labour laws (which always state the minimum notice period) applicable in the countries in which MTN operates. It is important to note that MTN has a generous retrenchment policy relative to severance pay.	
Occupational health and safety			
G4-LA5	Employee representation in health and safety committees	• SR: The workplace	• SR: 28
G4-LA6	Total number of work-related fatalities, rates of injury, occupational diseases, lost days and absenteeism	• SR: The workplace; sustainability value add statement • 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 • 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/injuries	• SR: 28; 31
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 offer assistance on various issues but mainly counselling as the first phase of issue management. Wellness for serious diseases is also done through the medical aid	
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	• SR: Annual sustainability statement • IR: Our people	• SR: 31 • IR: 10-20
Training and education			
G4-LA9	Average hours of training per employee per year	Employees are actively encouraged to continuously take advantage of opportunities to improve their capabilities and skills through extensive training available digitally, face-to-face and from other sources supplied by the MTN Academy, or from external accredited and reputable organisations. MTN Academy regularly compiles internal reports for management on the nature of training undertaken by employees, amount of time spent on each module, and pass rates. Certain elements of training are mandatory for all employees. Directors also receive regular and informative updates and training on legislative, regulatory, and any other business-related changes throughout their tenure. They are also encouraged to discuss their development needs with the chairman, and are provided with training where necessary • SR: Sustainability value add statement	• SR: 30

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*	Page(s)
G4-LA10	Employee skills and training programmes	• SR: Sustainability value add statement • As part of our training and development initiative we offer courses to our employees in the subjects of business acumen, commercial, leadership and behavioural, organisation development and technology. Based on 2016 results, the majority of courses completed were related to technology, followed by business acumen. • E-Learning as well as instructor-led programmes of the MTN Academy cover all disciplines of work. • 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 is structured to take into account the technical and behavioural requirements for each position, level of work and functional area in our organisation. We offer training and development solutions for business, organisational behaviour, commercial, technology and leadership capabilities	• SR:30
G4-LA11	% employees receiving performance reviews and career development	• SR: Annual sustainability statement – sustainability value add statement	• SR: 30
Diversity and equal opportunity			
G4-LA12	Composition of governance bodies	• IR: How we are governed • SR: Sustainability value add statement	• IR: 57-59 • SR: 30
G4-LA13	Ratio of basic salary of men to women by employee category	MTN appoints employees based on 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.	
LA15	Return to work and retention rates after parental leave, by gender	The MTN Group does not currently report against this indicator.	
HUMAN RIGHTS			
Disclosure on management approach			
HR:MD	Management approach: investment and procurement practices, non-discrimination, freedom of association and collective bargaining, abolition of child labour, prevention of forced and compulsory labour, complaints and grievance practices, security practices, and indigenous rights	• SR: Digital human rights • 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 • MTN Group adheres to specifications of the *International Labour Organisation* Protocol on decent work and working conditions (core standards of freedom of association, forced labour, child labour, anti-discrimination). These are integrated in the Group Code of Ethics, and included in the Group Social and Ethics Committee's terms of reference.	• SR: 25-27
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	An MTN Supplier Code of Conduct was issued in December 2016. This code 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. Since this is newly instituted, no data is available as yet.	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*	Page(s)
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	• Not available • In the 2016 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. • 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 conduct enables us to correctly manage situations where an employee may infringe on these rights.	
Child Labour			
G4-HR5	Any incidents of child labour and measures taken?	• MTN Group adheres to specifications of the *International Labour Organisation* Protocol on decent work and working conditions (core standards of freedom of association, forced labour, child labour, anti-discrimination). These are integrated in the Group Code of Ethics, and included in the Group Social and Ethics Committee's terms of reference. • 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	• SR: 25-27
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 *International Labour Organisation* Protocol on decent work and working conditions (core standards of freedom of association, forced labour, child labour, anti-discrimination). These are integrated in the Group Code of Ethics, and included in the Group Social and Ethics Committee's terms of reference. • 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	
G4-HR9	Percentage and total number of operations that have undergone human rights reviews	0% in terms of indigenous rights	
G4-HR12	Number of human rights grievances filed, and resolved through formal mechanisms	The MTN Group does not track this indicator	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response (Document, Section, Page Number or additional information on www.mtn.com)	Page(s)
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	• SR: 25-27
Community			
G4-SO1	Percentage of operations with local community engagement, impact assessments, and development programs.	• • SR: 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 • **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	
Corruption			
G4-SO3	Total number and percentage and of operations assessed for risks related to corruption and the significant risks identified	• The annual Group Culture Audit contains a Corporate Integrity Index the results of which indicate employee perceptions of corporate integrity **from across all operations**. • A Group-wide corporate integrity survey (ethics risk assessment) conducted across all MTN operations which specifically includes the probing of the prevalence of instances of corruption was conducted from 1 to 19 June 2016, with each of the operations receiving their specific integrity risk profile indicating high, moderate and low ethical CULTURE risks, ethical BEHAVIOUR risks and ethics management risks. These are being analysed for incorporation into the company's corporate risk register. • https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/governance-and-management.aspx • IR: How we are governed; our approach to risk	• IR: 32-36; 55
G4-SO4	Communication and training on anticorruption policies and procedures	• IR: How we are governed; our approach to risk	• IR: 32-36; 55
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 • Disciplinary sanctions categories enforced in 2016: Theft (3%); Fraud (18%); Gross Negligence (2%); Negligence (5%); Misconduct (70%)*; Other (2%) *Increase in Misconduct due to increase in reporting of misconduct from MTNSA and MTN CDI. Top two instances of misconduct reported: (1) Bad timekeeping including lateness for work; (2) Failure to carry out duties or Failure to adhere to laid down policies* • Disciplinary sanctions enforced in 2016: o Verbal warning (12%) o Written warning (47%) o Suspension (17%) o Dismissal (14%) o Pending (10%)	

G4-1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*	Page(s)
Public policy			

G4-SO6	Engagement in public policy	• https://www.mtn.com/Sustainability/Documents/Group_Social_and_Ethics_Statement_2013.pdf
		• The executive for regulatory affairs and public policy reports to the Group chief executive officer and president
		• Public policy engagement is undertaken through the following means:
		  o Via any matters of consideration by the GSMA
		  o Via the necessary regulatory agency either in formal public commentary invitation processes, or as required for possible emerging regulation or industry-specific matters such as carbon taxes, spectrum allocation, etc. (MTN operations may engage directly with the necessary regulatory agency, or collectively via national business or industry associations)
		  o With other national or international bodies or authorities such as the African Union, and the National Business Initiative or industry associations	

G4-SO6	Financial / in-kind contributions to political parties	• No contributions made in 2016	
Anti-competitive behaviour			
G4-SO7	Number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	• Not available	
Compliance			
G4-SO8	Monetary value of significant fines and number of non-monetary sanctions for non-compliance with regulations	• IR: Financial review	• IR: 41-47
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/Sustainability/Documents/Networks_and_Environment_2016.pdf	• SR: 16
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 www.mtn.com/sustainability/Mobiles and Health • 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 www.mtn.com/sustainability/Mobiles and Health • Regarding the position paper above, all handsets have to 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 operations, and is subject to requirements set out by the national telecommunications regulator
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	• MTN operations maintain terms, conditions on service and legal content on the local website for the operations as indicated in G4-HR4. These terms and conditions may also include any additional information useful to subscribers, such as activation agreements, transfer procedures, defective goods and technical fault reporting, and more, and are often also separately detailed for different types of value-add and internet services, phones and devices, etc. Terms and conditions of service for physical products such as mobile handsets and tablets may also be included in the product pack. Product and service labelling may also be subject to additional communication, disclosure or other requirements as set out by national consumer protection regulations in each of the countries where we operate. Customer complaint and feedback services are available through walk-in service and other centres, and via voice, e-mail, social media and other digital channels • The types of products and services offered by each of our operations may vary from country to country, and this information is therefore not at 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 Please refer to the country website of each MTN operation for more information.
G4-PR3	Incidents of regulatory non-compliance concerning product and service information labelling	• None
G4-PR5	Customer satisfaction practices: surveys etc.	• IR: Our strategic performance in 2016 (NPS); operational review • IR: 30; 47-52
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

UNGC Principle	MTN's Response
	(Document, Section, Page Number or additional information on www.mtn.com)

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 **Outcomes from implementing Principle 1** **G4-HR8 - ANY INCIDENTS WHERE INDIGENOUS PEOPLE'S RIGHTS WERE VIOLATED AND MEASURES TAKEN?** • The MTN Group does not track this indicator **G4-HR12 - NUMBER OF HUMAN RIGHTS GRIEVANCES FILED, AND RESOLVED THROUGH FORMAL MECHANISMS** The MTN Group does not track this indicator

UNGC Principle	MTN's Response
Principle 2 Businesses should make sure that they are not complicit in human rights abuses	**GRI Disclosures to report actions taken to implement Principle 2 and outcomes from implementing Principle 2** Indicators Human Rights: Aspect Investment: **G4-HR1: TOTAL NUMBER AND PERCENTAGE OF SIGNIFICANT INVESTMENT AGREEMENTS AND CONTRACTS THAT INCLUDE HUMAN RIGHTS CLAUSES OR THAT UNDERWENT HUMAN RIGHTS SCREENING** • Not available. Aspect Supplier Human Rights Assessment **G4-HR10: PERCENTAGE OF NEW SUPPLIERS THAT WERE SCREENED USING HUMAN RIGHTS CRITERIA** • 0% - (However, an MTN Supplier Code of Conduct was issued in December 2016. This code 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. Since this is newly instituted, no data is available as yet.) **G4-HR11: SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE HUMAN RIGHTS IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN** • 0 %
LABOUR	
Principle 3 Businesses should uphold the freedom of association and the effective recognition to the right to collective bargaining	**GRI Disclosures to report actions taken to implement Principle 3 and outcomes from implementing Principle 3** General Standard Disclosures Organizational Profile **G4-11** a. Report the percentage of total employees covered by collective bargaining agreements. • Not available Indicators Human Rights: Aspect Freedom of Association and Collective Bargaining **G4-HR4: OPERATIONS AND SUPPLIERS IDENTIFIED IN WHICH THE RIGHT TO EXERCISE FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING MAY BE VIOLATED OR AT SIGNIFICANT RISK, AND MEASURES TAKEN TO SUPPORT THESE RIGHTS** • The MTN Group does not currently report against this indicator Labour: Aspect Labour/Management Relations **G4-LA4: MINIMUM NOTICE PERIODS REGARDING OPERATIONAL CHANGES, INCLUDING WHETHER THESE ARE SPECIFIED IN COLLECTIVE AGREEMENTS** • The Group does provide internal notification to employees regarding significant operational changes. These vary depending on the nature and scope of the change. Employees are notified as soon as a possible restructuring process within the organisation is considered. This follows a consultation process. Once an employee has been confirmed for retrenchment, s/he is given at least one month's notice. This notice period may even be longer than one month, as determined by the various labour laws (which always state the minimum notice period) applicable in the countries in which MTN operates. It is important to note that MTN has a generous retrenchment policy relative to severance pay

UNGC Principle	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Principle 4 The elimination of all forms of forced and compulsory labour	**GRI Disclosures to report actions taken to implement Principle 4 and outcomes from implementing Principle 4** Indicators Human Rights: Aspect: Forced or Compulsory Labour **G4-HR6: OPERATIONS AND SUPPLIERS IDENTIFIED AS HAVING SIGNIFICANT RISK FOR INCIDENTS OF FORCED OR COMPULSORY LABOR, AND MEASURES TO CONTRIBUTE TO THE ELIMINATION OF ALL FORMS OF FORCED OR COMPULSORY LABOUR** • No incidents
Principle 5 The effective abolition of child labour	**GRI Disclosures to report actions taken to implement Principle 5 and outcomes from implementing Principle 5** Indicators Human Rights: Aspect Child Labour **G4-HR5: OPERATIONS AND SUPPLIERS IDENTIFIED AS HAVING SIGNIFICANT RISK FOR INCIDENTS OF CHILD LABOR, AND MEASURES TAKEN TO CONTRIBUTE TO THE EFFECTIVE ABOLITION OF CHILD LABOUR** • 0 % • 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** a. Report the total number of employees by employment contract and gender. b. Report the total number of permanent employees by employment type and gender. c. Report the total workforce by employees and supervised workers and by gender. d. Report the total workforce by region and gender. e. 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. f. Report any significant variations in employment numbers (such as seasonal variations in employment in the tourism or agricultural industries). • Sustainability Report: Sustainability value added statement – page 30 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: Sustainability value added statement page 30

Labour Practices and Decent Work:

Aspect: Employment

G4-LA1: TOTAL NUMBER AND RATES OF NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER BY AGE GROUP, GENDER AND REGION
- Not available

G4-LA3: RETURN TO WORK AND RETENTION RATES AFTER PARENTAL LEAVE, BY GENDER
- Not available

Aspect: Training and Education

G4-LA9: AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE BY GENDER, AND BY EMPLOYEE CATEGORY
- Sustainability Report: Annual Sustainability Statement page 30

G4-LA11: PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS, BY GENDER AND BY EMPLOYEE CATEGORY
- Sustainability Report: Annual Sustainability Statement page 30

Aspect: Diversity and Equal Opportunity

G4-LA12: COMPOSITION OF GOVERNANCE BODIES AND BREAKDOWN OF EMPLOYEES PER EMPLOYEE CATEGORY ACCORDING TO GENDER, AGE GROUP, MINORITY GROUP MEMBERSHIP, AND OTHER INDICATORS OF DIVERSITY
- Integrated Report: How we are governed (page 57-59)
- Sustainability Report: Sustainability value added statement (page 30)

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 2016 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 (page 19)
- https://www.mtn.com/MTN%20Service%20Detail%20Report%20 archive/MTN_Group_2016
- 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 (pages 16-22)
- Sustainability Report: Sustainability value add statement (pages 20-22; 31)

Aspect: Energy
G4-EN3: ENERGY CONSUMPTION WITHIN THE ORGANIZATION
- Sustainability Report: Eco-responsibility; energy and climate; sustainability value add statement (pages 16-19; 31)
- **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; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- https://www.cdp.net/en/search

G4-EN16: ENERGY INDIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 2)
- SR: Eco-responsibility – energy and climate (pages 16-19)
- SR: Sustainability value add statement (page 31)
- https://www.cdp.net/en/search

G4-EN17: OTHER INDIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 3)
- SR: Eco-responsibility – energy and climate (pages 16-19)
- SR: Sustainability value add statement (page 31)
- 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 9.6GtCO2 e or 16.5% of global outputs by 2020. Although our solutions in this domain are relatively small, opportunities are growing rapidly, and include cloud computing for virtualisation and other efficiencies, and machine-to-machine products to address risks of water leakage, report on air quality composition for improvement efforts, and encouragement of energy efficient driving by fleet drivers using our fleet management solution
- SR: Sustainable economies – transforming enterprises (SR pages 12-13)
- https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=29
- https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=28
- https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=23

Aspect: Overall
G4-EN31: TOTAL ENVIRONMENTAL PROTECTION EXPENDITURES AND INVESTMENTS BY TYPE
- IR: How we are governed (page 63)
- SR: Approach to sustainability (page preceding table of contents; page 3)
- SR: Eco-responsibility; environmental management; sustainability value add statement (pages 20-22; 31)
- https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_%20Mobile_and_Health.pdf • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_Networks_and_Environment.pdf

ENVIRONMENT *(continued)*

Principle 8 Undertake initiatives to promote greater environmental responsibility	**GRI Disclosures to report actions taken to implement Principle 8 and outcomes from implementing Principle 8**

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

Indicators

Environmental:

Aspect: Materials
G4-EN1: MATERIALS USED BY WEIGHT OR VOLUME
The most material resource used is electronic and electrical equipment.
- Sustainability Report: Eco-responsibility ; environmental management (page 16-22)
- Sustainability Report: Sustainability value add statement (page 30-32)

G4-EN2: PERCENTAGE OF MATERIALS USED THAT ARE RECYCLED INPUT MATERIALS
Due of 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; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- https://www.cdp.net/en/search

G4-EN4: ENERGY CONSUMPTION OUTSIDE OF THE ORGANIZATION
- SR: Eco-responsibility; energy and climate; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- https://www.cdp.net/en/search

G4-EN5: ENERGY INTENSITY
- SR: Eco-responsibility; energy and climate; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- https://www.cdp.net/en/search

G4-EN6: REDUCTION OF ENERGY CONSUMPTION
- SR: Eco-responsibility; energy and climate; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- https://www.cdp.net/en/search

G4-EN7: REDUCTIONS IN ENERGY REQUIREMENTS OF PRODUCTS AND SERVICES
- SR: Eco-responsibility; energy and climate; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- 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 is addressed. In 2015, MTN Cyprus also attained ISO 14001 certification. MTN Nigeria is currently in the process of implementing the requirements necessary to achieve ISO 14001 certification. Other operations, while not ISO 14001-certified, maintain safety health and environmental policies, and as part of business plans, all MTN countries of operation are reviewing environmental risks as a focus area in terms of the Group's principal risks. A number of MTN operations are currently implementing the Group Green Office toolkit, for water saving opportunities at offices and similar premises. SR: Environmental management

G4-EN9: WATER SOURCES SIGNIFICANTLY AFFECTED BY WITHDRAWAL OF WATER
- Not material as indicated above

G4-EN10: PERCENTAGE AND TOTAL VOLUME OF WATER RECYCLED AND REUSED
- Not material as indicated above

Aspect: Biodiversity
G4-EN11: OPERATIONAL SITES OWNED, LEASED, MANAGED IN, OR ADJACENT TO, PROTECTED AREAS AND AREAS OF HIGH BIODIVERSITY VALUE OUTSIDE PROTECTED AREAS
- The MTN Group does not currently report against this indicator

G4-EN12: DESCRIPTION OF SIGNIFICANT IMPACTS OF ACTIVITIES, PRODUCTS, AND SERVICES ON BIODIVERSITY IN PROTECTED AREAS AND AREAS OF HIGH BIODIVERSITY VALUE OUTSIDE PROTECTED AREAS
- SR: Eco-responsibility – environmental management (page 16)
- https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2016.pdf

G4-EN13: HABITATS PROTECTED OR RESTORED
- Due to the nature of MTN's business, the Group does not report against this indicator. However, environmental impact assessments are undertaken as part of network infrastructure and facilities implementation.
- https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2016.pdf

G4-EN14: TOTAL NUMBER OF IUCN RED LIST SPECIES AND NATIONAL CONSERVATION LIST SPECIES WITH HABITATS IN AREAS AFFECTED BY OPERATIONS, BY LEVEL OF EXTINCTION RISK
- Due to the nature of MTN's business, this Group does not report against this indicator. However, environmental impact assessments are undertaken as part of network infrastructure and facilities implementation.
- https://www.mtn.com/Sustainability/Documents/Networks_and_Environment_2016.pdf

Aspect: Emissions
G4-EN15: DIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 1)
- SR: Eco-responsibility; energy and climate; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- https://www.cdp.net/en/search

G4-EN16: ENERGY INDIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 2)
- SR: Eco-responsibility; energy and climate; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- https://www.cdp.net/en/search

G4-EN17: OTHER INDIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 3)
- SR: Eco-responsibility; energy and climate; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- https://www.cdp.net/en/search

G4-EN18: GREENHOUSE GAS (GHG) EMISSIONS INTENSITY
- SR: Eco-responsibility; energy and climate; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- https://www.cdp.net/en/search

G4-EN19: REDUCTION OF GREENHOUSE GAS (GHG) EMISSIONS
- SR: Eco-responsibility; energy and climate; (pages 16-19)
- SR: Sustainability value add statement (page 31)
- 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: Eco-responsibility (page 16-19)
- 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 (page 16-19)
- SR: Sustainability value statement (page 30-32)

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). 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.
- For tonnage, see SR: Environmental management; sustainability value add statement (pages 21; 31)

G4-EN26: IDENTITY, SIZE, PROTECTED STATUS, AND BIODIVERSITY VALUE OF WATER BODIES AND RELATED HABITATS SIGNIFICANTLY AFFECTED BY THE ORGANIZATION'S DISCHARGES OF WATER AND RUNOFF
- Although not a material aspect for the Group, see SR: Eco-responsibility
- https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_Networks_and_Environment.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 $9.6GtCO_2e$ or 16.5% of global outputs by 2020. Although our solutions in this domain are relatively small, opportunities are growing rapidly, and include cloud computing for virtualisation and other efficiencies, and machine-to-machine products to address risks of water leakage, report on air quality composition for improvement efforts, and encouragement of energy efficient driving by fleet drivers using our fleet management solution
- SR: Sustainable economies – transforming enterprises (pages 12-13)
- https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=29
- https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=28
- https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=23

G4-EN28: PERCENTAGE OF PRODUCTS SOLD AND THEIR PACKAGING MATERIALS THAT ARE RECLAIMED BY CATEGORY
- SR: sustainability vale added statement (page 31)

Principle 8 Undertake initiatives to promote greater environmental responsibility	Aspect: Compliance **G4-EN29: MONETARY VALUE OF SIGNIFICANT FINES AND TOTAL NUMBER OF NONMONETARY SANCTIONS FOR NON-COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS** • The Group's legal and regulatory function in each country's operations is responsible for oversight and therefore receives reports on all non-compliances and fines issued including environmental matters if such incidents have occurred • No significant fines and sanctions Aspect: Transport **G4-EN30: SIGNIFICANT ENVIRONMENTAL IMPACTS OF TRANSPORTING PRODUCTS AND OTHER GOODS AND MATERIALS FOR THE ORGANIZATION'S OPERATIONS, AND TRANSPORTING MEMBERS OF THE WORKFORCE** • Although transportation is not a source of significant environmental impacts and is not deemed material, greenhouse gas emissions associated with transport are quantified. • SR: Eco-responsibility – energy and climate (page 17-19) • SR: Sustainability value added statement (page 31) • https://www.cdp.net/en/search Aspect: Overall **G4-EN31: TOTAL ENVIRONMENTAL PROTECTION EXPENDITURES AND INVESTMENTS BY TYPE** • SR: Eco-responsibility – environmental management (page 20-22) • IR : How we are governed (page 63) • SR: About this report; approach to sustainability (page preceding table of contents; 3) • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_%20Mobile_and_Health.pdf • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_Networks_and_Environment.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: Energy and climate (pages 17-19) • https://www.mtn.com/en/mtn-group/sustainability/ecoresponsibility/Pages/energy-and-climate.aspx • https://www.cdp.net/en/search **G4-EN7: REDUCTIONS IN ENERGY REQUIREMENTS OF PRODUCTS AND SERVICES** • SR: Energy and climate (pages 17-19) • https://www.mtn.com/en/mtn-group/sustainability/ecoresponsibility/Pages/energy-and-climate.aspx • https://www.cdp.net/en/search • https://www.cdp.net/en-US/Pages/CDPAdvancedSearchResults.aspx?k=MTN

Aspect: Emissions

G4-EN19: REDUCTION OF GREENHOUSE GAS (GHG) EMISSIONS
- SR: Eco-responsibility; energy and climate; sustainability value add statement (pages 16-19; 31)
- https://www.mtn.com/en/mtn-group/sustainability/ecoresponsibility/Pages/energy-and-climate.aspx
- 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 $9.6GtCO_2e$ or 16.5% of global outputs by 2020. Although our solutions in this domain are relatively small, opportunities are growing rapidly, and include cloud computing for virtualisation and other efficiencies, and machine-to-machine products to address risks of water leakage, report on air quality composition for improvement efforts, and encouragement of energy efficient driving by fleet drivers using our fleet management solution.
- SR: Sustainable economies – transforming enterprises (pages 12-13)
- https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=29
- https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=28
- https://www.mtn.com/Sustainability/MoreOnSustainability/Pages/CaseStudyFullView.aspx?pID=23

Aspect: Overall

G4-EN31: TOTAL ENVIRONMENTAL PROTECTION EXPENDITURES AND INVESTMENTS BY TYPE
- IR : How we are governed (page 63)
- SR: About this report; approach to sustainability (page preceding table of contents; 3)
- https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_%20Mobile_and_Health.pdf
- https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_Networks_and_Environment.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 • SR: About this report • https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/default. aspx • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2013_Group_Social_and_Ethics_Statement. pdf • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2013_Anti_Corruption.pdf • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2013_Conflicts_of_Interest.pdf https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2013_Digital_Human_Rights.pdf • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_%20Mobile_and_Health.pdf • https://www.mtn.com/MTN%20Service%20detail%20Document%20library/2016_Networks_and_Environment.pdf

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 19 certified Ethics Officers (registered with the Ethics Institute of South Africa) from across various organisational disciplines, e.g. Procurement, Business Risk Management, Finance (Group Tax), Legal and HR who provide assistance and advice at both personal level and systemic level to all OPCOs in terms of ethics management practice.
- Ethics related priority policies as well as the Codes (Code of Ethics, Social and Ethics Statement and Employee Conduct Pledge) direct behaviour and practice, and contain directives on routes to follow for the reporting of ethical breaches.
- An Issue Management Council exists at head office as well as in most Opcos.

G4-58

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

- All Ethics related policies indicate the appropriate route to follow with regard to reporting of ethics policy breaches, i.e. line manager / head of function / Group Chief Officer (HR and Corporate Affairs or Group Chief Officer Business Risk Management), or the whistleblowing line (Tip-offs Anonymous (anonymous@tip-offs.net).
- An ethics advice line exists on the intranet (MTNConnect) – a social platform where employees may raise issues for purposes of gaining advice.
- A dedicated mailbox (MTNGroupEthics@mtn.com) 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

- The annual Group Culture Audit contains a Corporate Integrity Index the results of which indicate employee perceptions of corporate integrity from across all operations.
- A Group-wide corporate integrity survey (ethics risk assessment) conducted across all MTN operations which specifically includes the probing of the prevalence of instances of corruption was conducted from 1 to 19 June 2016, with each of the operations receiving their specific integrity risk profile indicating high, moderate and low ethical CULTURE risks, ethical BEHAVIOUR risks and ethics management risks. These are being analysed for incorporation into the company's corporate risk register.
- https://www.mtn.com/en/mtn-group/about-us/ethics/Pages/governance-and-management.aspx
- IR: How we are governed; our approach to risk (pages 32 to36; 55)

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

- IR: How we are governed; our approach to risk (pages 32 and 61)

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 categories enforced in 2016:

  Theft (3%); Fraud (18%); Gross Negligence (2%); Negligence (5%); Misconduct (70%)*; Other (2%)
  *Increase in Misconduct due to increase in reporting of misconduct from MTNSA and MTN CDI. Top two instances of misconduct reported: (1) Bad timekeeping including lateness for work; (2) Failure to carry out duties or Failure to adhere to laid down policies

- Disciplinary sanctions enforced in 2016:
  - Verbal warning (12%)
  - Written warning (47%)
  - Suspension (17%)
  - Dismissal (14%)
  - Pending (10%)

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 2016.

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