25 YEAR BIRTHDAY

#GoodTogether

MTN Group Limited

Global Reporting Initiative report
for the year ended 31 December 2019

MTN

Who we are

Our vision

To lead the delivery of a bold, new digital world

Our belief

Everyone deserves the benefits of a modern connected life

Our ambition

300 million subscribers
200 million active data users
100 million digital and MoMo users

Our values

Leadership · Innovation · Relationships · Integrity · Can do

A clear strategy

B — Best customer experience
R — Returns and efficiency focus
I — Ignite commercial performance
G — Growth through data and digital
H — Hearts and minds
T — Technology excellence

MTN is a digital operator with over 250 million customers across 21 emerging markets in Africa and the Middle East. Our markets have fast-growing youthful populations with the lowest mobile penetration globally. Together with our partners', we are ideally positioned to capture growth in these markets while playing an active role in unlocking economic growth opportunities by bridging the digital divide.

Our business is guided by our BRIGHT strategy, which clearly defines the areas on which we need to focus to build our business sustainably and create value for our stakeholders. We strive to create social-economic value using our institutional capabilities while adding value to each aspect of the BRIGHT strategy. 🌐
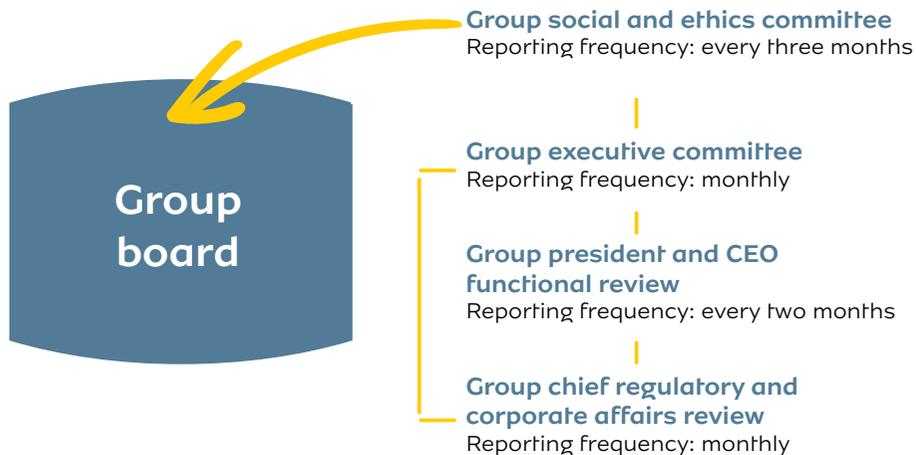
As a digital operator, we have adopted a three-pronged business model that encompasses; (1) the evolving telco focused on traditional telecommunications services, (2) the digital operator geared towards emerging digital platforms, and (3) the fintech player advancing mobile financial services.

Our sustainability approach

Our sustainability vision is to create and protect shared value for MTN and our stakeholders through responsible economic, environmental and social practices.

Our sustainability framework consists of three pillars, around which this report is structured. Our framework goes beyond traditional models of focusing on environment, social and governance matters to include economic value that is shared with our stakeholders and which in turn provides broader socio-economic benefits to society.

Sound corporate governance, ethical conduct, robust risk management and regulatory compliance are the foundations of our shared-value approach and our long-term sustainability. Our sustainability governance and reporting structure is available on our website.

Group social and ethics committee
Reporting frequency: every three months

Group board

Group executive committee
Reporting frequency: monthly

Group president and CEO functional review
Reporting frequency: every two months

Group chief regulatory and corporate affairs review
Reporting frequency: monthly

Three pillars of MTN's sustainability

Sustainable economic value

Digital and financial innovation that **enhances** lives in **society**

- **Digital and financial solutions** to close the digital and financial divide
- **Addressing barriers to inclusion:** Coverage, handsets, affordability, service bundling and ease of access education
- **Internet of Things (IoT)**, smart and other enterprise solutions that address specific social and environmental requirements

economic

Sustainable societies

Support vibrant, successful **communities**

- **Ethics:** Ethics and anti-corruption
- **Human rights:** Online freedom of expression, privacy, security and online child safety
- **The workplace:** Healthy and safe working conditions, skills to manage innovation disruptions in workplace, diversity and inclusion
- **Corporate social investment:** Investing in communities and broader society
- **Supply chain:** Ethical, sustainable environmentally responsible supply chain partners

social and governance

Eco-responsibility

Reduce our **environmental** impact

- **Climate:** Energy efficiency and alternative energy investment to reduce greenhouse gas outputs
- **Green offices:** Reduce impact, cost, use and waste from natural resources
- **E-waste:** Electronic and electrical waste management/ reduction included in upstream and downstream supply chain

environment

Everyone deserves the benefit of a modern connected life

MTN's GRI context index

MTN's disclosures are guided by the Global Reporting Initiative's (GRI) Standards ('Core' option). This document serves as MTN's 2019 GRI content index and includes references to where information for each GRI disclosure can be found across MTN's suite of reporting, or on the MTN website.
This document can be found at: https://www.mtn.com/sustainability/reports/

Key:
2019 IR: MTN's 2019 integrated report (IR) that is referenced within this content index and available here: https://www.mtn.com/investors/financial-reporting/integrated-reports/.
2019 SR: MTN's 2019 sustainability report (SR) that is referenced within this content index and available here: https://www.mtn.com/sustainability/reports/.

Indicator	Disclosure	Reference and information	Page(s)
GRI 102: General disclosures			
102-1	Name of the organisation	MTN Group Limited	
102-2	Activities, brands, products and services	https://www.mtn.com/what-we-do/	
102-3	Location of headquarters	MTN Group Limited is located at 216 14th Avenue, Fairland, 2195, South Africa	
102-4	Location of operations	2019 IR and SR: Who we are MTN operates in 21 countries in Africa and the Middle East. https://www.mtn.com/contact/#contact-countries	1 and 2
102-5	Ownership and legal form	2019 IR: Who we are. MTN Group Limited is publicly owned entity whose shares are listed on the Johannesburg Stock Exchange	1
102-6	Markets served	2019 IR and SR: Who we are MTN operates in 21 countries in Africa and the Middle East. https://www.mtn.com/contact/#contact-countries	1
102-7	Scale of the organisation	2019 IR and SR: Who we are	1 and 2
102-8	Information on employees and other workers	2019 IR: How we sustain value using the six capitals 2019 SR: Our workplace	16 39, 63
102-9	Supply chain	2019 SR: Global sourcing and supply chain. MTN has approximately 15 000 suppliers. MTN's suppliers are located globally, with key network suppliers located in Europe and China, while our local supplier base is spread across Africa and the Middle East. Sector-specific characteristics include the fact that automation remains low and therefore the use of labour remains key to the operations of the supply chain and the telecommunications supply chain is subject to stringent custom regulations on imported items. Given the nature of network items required, we often procure products specifically for our requirements, and therefore these are not classified as off-the-shelf.	43 to 44

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
102-10	Significant changes to the organisation and its supply chain	2019 SR: Global sourcing and supply chain One of our key strategies is to utilise digital tools to support effective demand planning and forecasting. We will continue to focus on digitising decision support. Many of the digitisation initiatives are driving decision support and help us to procure the right products and services at the right time, thereby reducing waste and airfreight. It also facilitates the movement of delivery vehicles through consolidation of inventory and better transportation planning.	43 to 44
102-11	Precautionary Principle or approach	2019 SR: Global sourcing and supply chain One of our key strategies is to utilise digital tools to support effective demand planning and forecasting. For example, improved demand planning in 2019 enabled us to shift shipments from air to sea channels saving costs and energy. This initiative has also resulted in less waste with a focus on procuring only what we consume.	44
102-12	External initiatives	2019 SR: About this report MTN Group is a signatory to the UN Global Compact. Committed to the articles of the Convention on the elimination of all forms of discrimination against women and UN Women Empowerment Principles applicable to all its markets. MTN is also a member of the Chartered Institute of Procurement and Supply (CIPS) and the GSMA-led industry-wide plan to achieve net-zero GHG emissions by 2050.	0
102-13	Membership of associations	The group is a member of GSMA and Broadband Commission. We also hold membership to International Telecommunications Union – Development Sector (ITU-D) and Radio communication Sector (ITU-R).	
102-14	Statement from senior decision-maker	2019 IR: View from our Chairman; Q&A with the CEO SR: Group President and CEO on sustainability	35 and 36, 37 and 38, 11 and 12
102-15	Key impacts risks and opportunities	2019 IR: Risk committee chair's review. Top risks to value creation 2019 SR: Key impacts, risks and opportunities are summarised in the sustainable economic value, sustainable societies and eco-responsibility sections	26 to 33
102-16	Organisation's values, principles, standards, norms of behaviour and codes of conduct/ethics	2019 IR: Who we are, social and ethics committee chair's review 2019 SR: Who we are, ethics, human rights and global sourcing and supply chain sections https://www.mtn.com/who-we-are/ethics/ethics-positions/	1, 20 2, 31 to 38, 43 and 44
102-17	Mechanisms for advice and concerns about ethics	2019 SR: Ethics. The group's whistle-blower line (called 'tip-offs anonymous') is available to employees, suppliers and any external party wishing to report concerns safely and anonymously (anonymous@tip-offs.net). Contact details for this service, located on the company's websites and internally, are communicated via a number of mechanisms including desktop screensavers, dedicated regular campaigns, newsletters, etc. All ethics-related policies indicate the appropriate route to follow with regard to the reporting of ethics policy breaches by employees. A dedicated mailbox (MTNGroupEthics@mtn.com) is available for all staff to raise issues of concern or ask advice privately. Engagement through this mailbox is managed confidentially. Issues raised are investigated and outcomes are reported.	31 to 34

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
102-18	Governance structure	2019 IR: Governance in action 2019 SR: Our sustainability approach	60 to 63 4
102-19	Delegating authority	2019 IR: Governance in action and social and ethics report 2019 SR: Our sustainability approach	60 to 63, 20, 4
102-20	Executive-level responsibility for economic, environmental and social topics	2019 IR: Governance in action and social and ethics report 2019 SR: Our sustainability approach	60 to 63, 20, 4
102-21	Consulting stakeholders on economic, environmental, and social topics	2019 IR: Relationships on which we rely to create value 2019 SR: Our stakeholders	21 5 and 6
102-22	Composition of the highest governance body and its committees	2019 IR: Governance in action and Social and Ethics report 2019 SR: Our sustainability approach	60 to 63, 20, 4
102-23	Chair of the highest governance body	2019 IR: Governance in action and social and ethics report 2019 SR: Our sustainability approach	60 to 63, 20, 4
102-24	Nominating and selecting the highest governance body	2019 IR: Governance in action and social and ethics report 2019 SR: Our sustainability approach	60 to 63, 20, 4
102-25	Conflicts of interest	2019 IR: Governance in action 2019 SR: Ethics https://www.mtn.com/who-we-are/ethics/ethics-positions/	60 to 63, 31 to 34
102-26	Role of highest governance body in setting purpose, values and strategy	2019 IR: Governance in action and social and ethics report 2019 SR: Our sustainability approach	60 to 63, 20, 4
102-27	Collective knowledge of highest governance body	2019 IR: Governance in action, our board of directors, and our executive committee 2019 SR: Our sustainability approach	60 to 63, 68 to 71, 4
102-28	Evaluating the highest governance body's performance	2019 IR: Governance in action and remuneration report	60 to 63, 72 to 97

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
102-29	Identifying and managing economic, environmental and social impacts	2019 IR: Social and ethics committee chair's review and our market context The committee considers sustainability matters including the group's compliance with ISO 14001, safety, health and environment, consumer protection laws and King Report on Governance for South Africa 2016 (King IV™*), social, environmental and ethical recommendations, employment equity, the IR and SR, sponsorships, corporate social investment activities and reviews and social and ethics-related policies	20, 6 and 7
102-30	Effectiveness of risk management processes	2019 IR: Top risks to value creation	26 to 33
102-31	Review of economic, environmental and social topics	2019 IR: Our market content See GRI 102-29	6 and 7
102-32	Highest governance body's role in sustainability reporting	2019 IR: Governance in action and social and ethics report SR: Our sustainability approach	60 to 63, 20, 4
102-33	Communicating critical concerns	2019 IR: Top risks to value creation, Material matters impacting value creation 2019 SR: Materiality process and top issues for our stakeholders	26 to 33, 18 and 19, 7 to 9, 6
102-34	Nature and total number of critical concerns	2019 IR: Governance in action 2019 SR: Our sustainability approach, ethics and human rights	60 to 63 4, 34, 37 to 38
102-35	Remuneration policies	2019 IR: Governance in action and remuneration report	60 to 63, 72 to 97
102-36	Process for determining remuneration	2019 IR: Governance in action and remuneration report	60 to 63, 72 to 97
102-37	Stakeholders' involvement in remuneration	2019 IR: Governance in action and remuneration report	60 to 63, 72 to 97
102-38	Annual total compensation ratio	2019 IR: Remuneration report	72 to 97
102-39	Percentage increase in annual total compensation ratio	2019 IR: Remuneration report	72 to 97
102-40	List of stakeholder groups	2019 IR: Relationships on which we rely to create value 2019 SR: Our stakeholders	21 5 and 6

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MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
102-41	Collective bargaining agreements	2019 SR: Annual sustainability statement	63
102-42	Identifying and selecting stakeholders	2019 IR: Relationships on which we rely to create value 2019 SR: Our stakeholders	21 to 24, 5 and 6
102-43	Approach to stakeholder engagement	2019 IR: Relationships on which we rely to create value 2019 SR: Our stakeholders	21 to 24, 5 and 6
102-44	Key topics and concerns raised	2019 IR: Relationships on which we rely to create value 2019 SR: Our stakeholders and top issues for our stakeholders	21 to 24, 5 and 6
102-45	Entities included in the consolidated financial statements	2019 IR: About this report and Who we are 2019 SR: About this report	0 and 1 1
102-46	Defining report content and topic boundaries	2019 IR: About this report and Who we are 2019 SR: About this report and Our sustainability approach	0, 1, 1, 4
102-47	List of material topics	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	18 and 19, 7 to 9
102-48	Restatements of information	Within the current year's integrated and sustainability reports, any data restatements are indicated as notes to quantitative statements included within the report.	N/A
102-49	Changes in reporting	2019 IR: About this report 2019 SR: About this report	0 1
102-50	Reporting period	1 January 2019 to 31 December 2019	N/A
102-51	Date of most recent report	31 December 2019	N/A
102-52	Reporting cycle	Annual	N/A
102-53	Contact point for questions regarding the report	Investor.Relations@mtn.com and sustainability@mtn.com	N/A
102-54	Claims of reporting in accordance with the GRI Standards	2019 IR: About this report 2019 SR: About this report	0 1

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
102-55	GRI content index	This document serves as MTN's 2019 GRI Content Index and includes references to where information for each disclosure can be found across MTN's suite of reporting, or on the MTN website. This document can be found at: https://www.mtn.com/sustainability/reports/	N/A
102-56	External assurance	2019 Independent assurance report: https://www.mtn.com/investors/financial-reporting/integrated-reports/ Select indicators in the 2019 Sustainability Report were externally verified. These indicators can be identified by the 'LA' icon that denotes Limited Assurance	N/A
103-1	Explanation of the material topic and its boundary	2019 IR: About this report; Our market context and material matters; Relationships on which we rely to create value 2019 SR: Our sustainability approach – materiality process	0, 6 and 7, 18 and 19, 21 to 24. 7 to 9
103-2	The management approach and its components	2019 IR and SR: MTN highlights its policies, commitments, goals and targets, responsibilities, resources, grievance mechanisms and specific actions such as processes, projects, programmes and initiatives throughout the reports	N/A
103-3	Evaluation of the management approach	2019 IR: Governance in action and remuneration report Ongoing external performance ratings by the JSE, investors/shareholders/analysts/ratings organisations, participating in benchmarking programmes undertaken by independent third-party organisations and ongoing stakeholder engagement.	60 to 63, 72 to 97
GRI 201: Economic performance			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	0 7 to 9
103-2	The management approach and its components	2019 IR: Governance in action For compliance with international standards and widely recognised initiatives concerning specific topics, see GRI 101-1.8 above Where goals and targets are indicated in the IR and the SR, these are sometimes indicated as time bound (e.g. for the upcoming financial year) or time-range bound (e.g. medium or long term).	60 to 63
103-3	Evaluation of the management approach	Mechanisms for monitoring the effectiveness of the management approach is undertaken using the following: Key performance indicator tracked and measured, monthly MSR (define) and risk and compliance or qualitative and quantitative dashboards for executive committee assessments, quarterly reports to board committees, annual external auditing of key selected material aspects, ongoing external performance ratings by the JSE Limited, investors/shareholders/analysts/ratings organisations, participating in benchmarking programmes undertaken by independent third-party organisations and ongoing stakeholder engagement as indicated in GRI 101 1.1.	N/A
201-1	Direct economic value generated and distributed	2019 IR: Where we operate and how we performed. What we are doing to address the opportunities and how we create value using the six capitals	4 and 5, 8 and 9, 14 to 16

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
201-2	Financial implications and other risks and opportunities due to climate change	2019 SR: Energy and climate The group's activities on energy management are submitted to the MTN Group Carbon Disclosure Project (CDP) and published on www.mtn.com In terms of the financial implications of risks and opportunities, MTN currently estimates its carbon tax liabilities in South Africa, as required by local legislation. MTN intends to align with the other recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) in the medium to long term.	52 to 59
201-3	Defined benefit plan obligations and other retirement plans	2019 IR: Remuneration report	72 to 97
201-4	Financial assistance received from government	In some countries, standard government rebates to encourage investment in national skills development and training is available to employers. In South Africa, for example, rebates at rates determined by the government are available on payments made in terms of the Skills Development Levies Act (where companies are registered with the South African Revenue Service, have a payroll above a government-determined threshold and make payments of 1% of monthly payroll costs to the national skills development levy). Some jurisdiction allows for extra deductions of certain employee costs, for example, granting extra tax deduction for employing graduates.	N/A
GRI 203: Indirect economic impacts			
103-1	Explanation of the material topic and its boundary	2019 IR: Technology excellence 2019 SR: Connecting the unconnected	58 and 59 16 to 19
103-2	The management approach and its components	2019 IR: Relationships on which we rely to create value 2019 SR: Our stakeholders. Connecting the unconnected	21 to 24 5 and 6 16 to 19
103-3	Evaluation of the management approach	2019 IR: Technology excellence 2019 SR: Connecting the unconnected	58 and 59 16 to 19
203-1	Infrastructure investments and services supported	2019 IR: Technology excellence 2019 SR: Connecting the unconnected	58 and 59 16 to 19
203-2	Significant indirect economic impacts	2019 IR: Technology excellence 2019 SR: Connecting the unconnected	58 and 59 16 to 19
GRI 204: Procurement practices			
103-1	Explanation of the material topic and its boundary	2019 SR: Global sourcing and supply chain	43 to 46
103-2	The management approach and its components	2019 SR: Global sourcing and supply chain	43 to 47

MTN Group Limited GRI Content Index for the year ended 31 December 2019

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
103-3	Evaluation of the management approach	2019 SR: Global sourcing and supply chain.	43 to 48
204-1	Proportion of spending on local suppliers	Proportion of spending on local suppliers as defined by local legislation is reported on in the 2019 SR. See MTN South Africa's procurement statistics for preferential procurement spend in South Africa.	44
GRI 205: Anti-corruption			
103-1	Explanation of the material topic and its boundary	2019 SR: Ethics https://www.mtn.com/who-we-are/ethics/our-codes-of-ethics/	31 to 34
103-2	The management approach and its components	2019 SR: Ethics https://www.mtn.com/who-we-are/ethics/our-codes-of-ethics/	31 to 34
103-3	Evaluation of the management approach	2019 SR: Ethics and annual sustainability statements https://www.mtn.com/who-we-are/ethics/our-codes-of-ethics/	31 to 34, 64
205-1	Operations assessed for risks related to corruption	2019 SR: Ethics https://www.mtn.com/who-we-are/ethics/our-codes-of-ethics/	31 to 34
205-2	Communication and training about anti-corruption policies and procedures	2019 SR: Ethics and annual sustainability statements https://www.mtn.com/who-we-are/ethics/our-codes-of-ethics/	31 to 34, 64
205-3	Confirmed incidents of corruption and actions taken	2019 SR: Ethics and annual sustainability statements https://www.mtn.com/who-we-are/ethics/our-codes-of-ethics/	31 to 34, 64
GRI 206: Anti-competitive behaviour			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	0 7 to 9
103-2	The management approach and its components	MTN Group has a competition law policy (Policy) that sets out MTN's expectations of its employees when dealing with competition legislation and provides guidance on how potential violations or competition risks are managed at MTN. We have developed a new competition law matter reporting template for the group. This template has been developed and designed in line with the Policy.	N/A
103-3	Evaluation of the management approach	MTN has started in-house competition law training in order to ensure that MTN employees fully understand how to accurately report on any competition matter.	N/A

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	Through the new competition law reporting template, MTN will be in a better position to take the appropriate legal action for anti-competitive, anti-trust and monopoly conduct.	
GRI 302: Energy			
103-1	Explanation of the material topic and its boundary	2019 SR: Materiality process 2019 SR: Eco-responsibility	18 and 19, 52 to 61
103-2	The management approach and its components	2019 SR: Eco-responsibility The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61
103-3	Evaluation of the management approach	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65
302-1	Energy consumption within the organisation	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65
302-2	Energy consumption outside of the organisation	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65
302-3	Energy intensity	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65
302-4	Reduction of energy consumption	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65
GRI 305: Emissions			
103-1	Explanation of the material topic and its boundary	2019 SR: Materiality process 2019 SR: Eco-responsibility	18 and 19, 52 to 61
103-2	The management approach and its components	2019 SR: Eco-responsibility The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61
103-3	Evaluation of the management approach	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65
305-1	Direct (scope 1) GHG emissions	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
305-2	Energy indirect (scope 2) GHG emissions	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65
305-3	Other indirect (scope 3) GHG emissions	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65
305-4	GHG emissions intensity	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65
305-5	Reduction of GHG emissions	2019 SR: Eco-responsibility and annual sustainability statements The group's activities on energy management are submitted to CDP and published on www.mtn.com	52 to 61, 65
305-6	Emissions of ozone-depleting substances (ODS)	This is included as reported for GRI 305-5. The group's activities on energy management are submitted to CDP and published on www.mtn.com	N/A
GRI 306: Effluents and waste			
103-1	Explanation of the material topic and its boundary	As a tertiary services organisation, MTN does not emit significant effluent. MTN's main waste impacts are not deemed high impact (material). Waste results from the use of electronic and electrical equipment, paper, plastic, water and tin/metals consumed in office operations, with e-waste being MTN's most material waste stream. 2019 SR: Eco-responsibility – environmental resources	57, 60 and 61
103-2	The management approach and its components	2019 SR: Eco-responsibility – environmental resources and annual sustainability statements In South Africa, e-waste is processed locally to the greatest possible extent by MTN's e-waste handlers. E-waste handed over by MTN for recycling or safe disposal is processed by handlers and recyclers who have been subject to due diligence, and/or are certified in terms of national regulations and/or global standards, including those related to transportation. A public/private partnership addressing extended producer responsibilities has been developed in Nigeria. A new programme for e-waste management in Ivory Coast has been announced in partnership with authorised handlers and recyclers.	57, 60 and 61, 65
103-3	Evaluation of the management approach	2019 SR: Eco-responsibility – environmental resources and annual sustainability statements In South Africa, e-waste is processed locally to the greatest possible extent by MTN's e-waste handlers. E-waste handed over by MTN for recycling or safe disposal is processed by handlers and recyclers who have been subject to due diligence, and/or are certified in terms of national regulations and/or global standards. A public/private partnership addressing extended producer responsibilities has been developed in Nigeria. A new programme for e-waste management in Ivory Coast has been announced in partnership with authorised handlers and recyclers.	57, 60 and 61, 65
306-2	Waste by type and disposal method	2019 SR: Eco-responsibility – environmental resources and annual sustainability statements	57, 60 and 61, 65

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
306-3	Significant spills	MTN strives to ensure that it follows due local and international environmental standards and regulations. In 2019, there were five significant diesel spillages that took place within MTN's West Africa region. Necessary measures took place: Site clean-up, replacement of old granites and review of fuel tanks to prevent fuel leakage Furthermore, the company is in the process of procuring specialised fuel carriers that will improve fuel leakage management	N/A
306-4	Transport of hazardous waste	2019 SR: Eco-responsibility Many substances contained in e-waste are considered hazardous. In South Africa, e-waste is processed locally to the greatest possible extent, by MTN's e-waste handlers. E-waste handed over by MTN for recycling or safe disposal is processed by handlers and recyclers who have been subject to due diligence, and/or are certified in terms of national regulations and/or global standards, including those related to transportation. A public/private partnership addressing extended producer responsibilities has been developed in Nigeria. A new programme for e-waste management in Ivory Coast has been announced in partnership with authorised handlers and recyclers. MTN does not currently collect quantitative information on e-waste transported (i.e. imported, exported, shipped internationally, treated) for any of the opcos and only quantitative information on e-waste generated is available.	57, 61
306-5	Water bodies affected by water discharges and/or runoff	As a tertiary services organisation, MTN does not emit significant effluent, water discharges and/or runoff. MTN predominantly draws water from local authority and municipal sources for consumption in office, data centre facilities and other sites. Grey water is used in some operations for bathroom facilities.	N/A
GRI 307: Environmental compliance			
103-1	Explanation of the material topic and its boundary	2019 SR: Materiality process 2019 SR: Eco-responsibility – environmental resources	18 and 19, 60 and 61
103-2	The management approach and its components	2019 SR: Eco-responsibility – environmental resources The group's activities on environmental compliance are submitted to CDP and published on www.mtn.com	60 and 61
103-3	Evaluation of the management approach	2019 SR: Eco-responsibility – environmental resources The group's activities on environmental compliance are submitted to CDP and published on www.mtn.com	60 to 62
307-1	Non-compliance with environmental laws and regulations	There were no significant non-compliances with environmental laws and regulations.	N/A

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
GRI 401: Employment			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	18 and 19, 7 to 9
103-2	The management approach and its components	2019 IR: Human capital. Hearts and minds 2019 SR: Our workplace	14 to 17, 56 and 57, 39 to 42
103-3	Evaluation of the management approach	2019 IR: Hearts and minds 2019 SR: Our workplace	56 and 57, 39 to 42
401-1	New employee hires and employee turnover	2019 SR: Annual sustainability statements	63
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	2019 IR: Remuneration report	72 to 97
401-3	Parental leave	Maternity and paternity leave is available to employees in some of the countries in which we operate. In MTN Group in particular, the amount of leave exceeds minimum statutory requirements as the employees are entitled to 10 days' fully paid for paternity and six months' fully paid for maternity leave.	N/A
GRI 402: Labour/Management relations			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	18 and 19, 7 to 9
103-2	The management approach and its components	2019 IR: Hearts and minds 2019 SR: Our workplace 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.	56 to 57, 39 to 42
103-3	Evaluation of the management approach	2019 IR: Hearts and minds 2019 SR: Our workplace	56 and 57, 39 to 42
402-1	Minimum notice periods regarding operational changes	Employees are notified as soon as possible of restructuring processes within the organisation if considered. This follows the due consultation processes applicable within the statutes of relevant laws. Once an employee has been confirmed for retrenchment, he/she is given the due notice as prescribed by the company's policies, subject to statutory regulations and laws of the respective country in which MTN operates.	N/A

MTN Group Limited GRI Content Index for the year ended 31 December 2019

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
GRI 403: Occupational health and safety			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process While occupational health and safety is not specifically identified as a material topic for MTN, during the year there were nine fatalities reported across the opcos, which are currently under investigation. MTN shall consider re-evaluating the materiality of this topic in the short to medium term and our management approach shall be strengthened accordingly with appropriate control measures to mitigate occupational health and safety incidents.	18 and 19, 7 to 9
103-2	The management approach and its components	2019 SR: Enhancing employee wellness MTN subscribes to all relevant health and safety acts, ordinances, by-laws and standards to ensure a conducive working environment and safe customer experience. The company reports all compliance obligations to the government as required. In South Africa, the mandate of the company is aligned with section 16 and section 8 of the Occupational Health and Safety Act (Act no 85 0f 1993) and all promulgated/amended regulations. In South Africa, health and safety governance is strictly subscribed to South African legislation. At opcos outside of South Africa, governance is adjusted to adhere to that particular country's legislation. MTN has a health and safety policy which serves as a guideline to implement the health and safety management programme. The policy is supported with procedures that govern all activities that may pose a risk to employees, customers, business partners and visitors. All reporting on control measures is available to both internal top management and the government where it is required.	42
103-3	Evaluation of the management approach	MTN has a health and safety committee that meets on a scheduled basis (e.g. warehouse, corporate sites, call centre). Minutes are recorded for all meetings and action items are assigned depending on the requirement. Follow-up sessions are held, with minuted action items noted to monitor ongoing compliance progress. Health and safety audits are undertaken both internally and externally. All reports are recorded on the company's health and safety sharepoint. Updating of the action plan where there are findings is conducted on an ongoing basis. Follow-up audits are conducted, enabling the audit team to update the company's risk register accordingly.	N/A
403-1	Workers representation in formal joint management–worker health and safety committees	MTN has a health and safety committee that meets on a scheduled basis (e.g. warehouse, corporate sites, call centre). The health and safety committee includes representation from management as well as workers.	N/A

MTN Group Limited GRI Content Index for the year ended 31 December 2019

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
403-2	Types of injury and rates of injury, occupational diseases, lost days, absenteeism and number of work-related fatalities	2019 SR: Wellness and safety All non-compliance findings are recorded in the risk register. We also have an occupational health and safety compliance risk monitoring framework to gauge compliance across business units. Emergency incidents are also recorded in the incident register.	63
GRI 404: Training and education			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	18 and 19, 56, 7 to 9
103-2	The management approach and its components	2019 IR: Hearts and minds 2019 SR: Our workplace – our approach Research indicates that the shelf life of knowledge is reducing year-on-year, which implies that people need to constantly be learning to keep up with new trends and technologies. MTN believes in giving people the opportunity to keep their skills sets current by giving them access to world-class learning experiences. An online platform with over 120 000 learning objects allows staff to complete courses and certifications as they choose. With mobile enablement and offline capabilities, learning is available anywhere and anytime. Learning fits into the flow of one's life and becomes an inherent part of day-to-day activities rather than a once-off experience.	56 and 57 39 to 42
103-3	Evaluation of the management approach	2019 IR: Hearts and minds 2019 SR: Our workplace	56 and 57, 39 to 42, 63
404-1	Average hours of training per year per employee	2019 SR: Annual sustainability statement	63
404-2	Programmes for upgrading employee skills and transition assistance programmes	2019 IR: Hearts and minds 2019 SR: Our workplace	56 and 57 39 to 42
404-3	Percentage of employees receiving regular performance and career development reviews	2019 SR: Annual sustainability statement	63

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
GRI 405: Diversity and equal opportunity			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process MTN's Position statement on workplace diversity and inclusion: https://www.mtn.com/wp-content/uploads/2019/03/Sustainable-societies-Workplace-Diversity-and-Inclusion-proof-read-version.pdf	18 and 19, 7 to 9
103-2	The management approach and its components	2019 IR: Hearts and minds 2019 SR: Our workplace MTN's Position statement on workplace diversity and inclusion: https://www.mtn.com/wp-content/uploads/2019/03/Sustainable-societies-Workplace-Diversity-and-Inclusion-proof-read-version.pdf	56 and 57, 39 to 42
103-3	Evaluation of the management approach	2019 IR: Hearts and minds 2019 SR: Our workplace and Annual sustainability statement MTN's Position statement on workplace diversity and inclusion: https://www.mtn.com/wp-content/uploads/2019/03/Sustainable-societies-Workplace-Diversity-and-Inclusion-proof-read-version.pdf	56 and 57, 39 to 42, 63
405-1	Diversity of governance bodies and employees	2019 IR: Hearts and minds and governance in action 2019 SR: Our workplace and annual sustainability statements	56 and 57, 60 to 63, 39 to 42, 63
GRI 406: Non-discrimination			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process MTN's Position statement on workplace diversity and inclusion: https://www.mtn.com/wp-content/uploads/2019/03/Sustainable-societies-Workplace-Diversity-and-Inclusion-proof-read-version.pdf MTN believes that diversity, inclusion and non-discrimination is both a moral imperative and a source of competitive advantage, as it enables innovation and access to a wider range of experiences and skills. The group social and ethics committee's terms of reference includes monitoring the company's activities with respect to its standing in terms of the International Labour Organisation Protocol on decent work and working conditions. In addition, the group diversity and inclusion committee is focused on driving strategies and priorities in line with our commitments towards diversity and inclusion across the company.	18 and 19, 7 to 9

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
103-2	The management approach and its components	2019 IR: Hearts and minds 2019 SR: Our workplace MTN's Position statement on workplace diversity and inclusion: https://www.mtn.com/wp-content/uploads/2019/03/Sustainable-societies-Workplace-Diversity-and-Inclusion-proof-read-version.pdf	56 and 57, 39 to 42
103-3	Evaluation of the management approach	2019 IR: Hearts and minds 2019 SR: Our workplace and annual sustainability statement MTN's Position statement on workplace diversity and inclusion: https://www.mtn.com/wp-content/uploads/2019/03/Sustainable-societies-Workplace-Diversity-and-Inclusion-proof-read-version.pdf	56 and 57, 39 to 42, 63
406-1	Incidents of discrimination and corrective actions taken	No case of discrimination has been submitted at MTN Group level during this reporting period	N/A
GRI 407: Freedom of association and collective bargaining			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	18 and 19, 7 to 9
103-2	The management approach and its components	2019 IR: Hearts and minds 2019 SR: Our workplace	56 and 57, 39 to 42
103-3	Evaluation of the management approach	2019 IR: Hearts and minds 2019 SR: Our workplace	56 and 57, 39 to 42
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	2019 SR: Unionised employees Currently, only information on the number of employees unionised employees in South Africa and as part of the group is available due to defined local legislation.	63
GRI 412: Human rights assessment			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process and human rights	18 and 19, 7 to 9, 35 to 38
103-2	The management approach and its components	2019 SR: Human rights	35 to 38

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
103-3	Evaluation of the management approach	2019 SR: Human rights	35 to 39
412-2	Employee training on human rights policies or procedures	Employees are trained on annual basis as policy revisions are undertaken. MTN's digital human rights policy was updated in 2019 and training on the revision of the policy is expected to be carried out in the short term, following which statistics on employee training in this regard shall be reported. MTN's Position on online freedom of expression, privacy and security (digital human rights): https://www.mtn.com/wp-content/uploads/2019/02/MTN-position-on-digital-human-rights_hi.pdf	N/A
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	2019 SR: Ensuring an ethical supply chain; Global sourcing and supply chain MTN Group supplier code of conduct: https://www.mtn.com/wp-content/uploads/2019/10/Supplier-code-of-conduct-2017.pdf	33, 43 and 44,
GRI 413: Local communities			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process and Corporate social investment	18 and 19, 7 to 9, 47 to 50
103-2	The management approach and its components	2019 IR: Social and relationship capital 2019 SR: Corporate social investment	14 to 17 47 to 50
103-3	Evaluation of the management approach	2019 IR: Social and relationship capital 2019 SR: Corporate social investment and annual sustainability statements	14 to 17 47 to 50, 66
413-1	Operations with local community engagement, impact assessments and development programmes	2019 IR: Social and relationship capital 2019 SR: Corporate social investment Across our footprint, the majority of our opcos engage with their beneficiary communities through various platforms and mechanisms. Guided by the MTN Group CSI policy, we strive to engage with the relevant identified internal and external stakeholders to understand the societal challenges and co-create community programmes. An example of a community-led programme driven by MTN Nigeria Foundation is the 'What Can We do together project'. This is a community based 'give-back' initiative where Nigerians are invited to nominate selected projects for particular communities to be implemented by MTN Foundation based on the needs of the community. MTN's Positions on social investment: https://www.mtn.com/sustainability/sustainable-societies/social-investment/	14 to 17 47 to 50

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
GRI 415: Public Policy			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	18 and 19, 7 to 9
103-2	The management approach and its components	2019 IR: Relationships on which we rely to create value and Our top risks	24, 27 to 30
103-3	Evaluation of the management approach	2019 IR: Relationships on which we rely to create value and Our top risks	24, 27 to 30
415-1	Political contributions	During the year, MTN did not make any political contributions. Contributions to political parties are made only when there are national elections, as per defined local legislative requirements, largely in South Africa.	N/A
GRI 416: Customer health and safety			
103-1	Explanation of the material topic and its boundary	MTN subscribes to all relevant health and safety acts, ordinances, by-laws and standards to ensure a conducive working environment and safe customer experience. The portfolio reports all compliance obligations to the government on a required basis. The mandate of the portfolio is aligned with section 16 and section 8 of the Occupational Health and Safety Act (Act no 85 0f 1993) and all promulgated/amended regulations. Governance directs all opcos of the organisation (we have group frameworks compiled). In South Africa, governance is strictly subscribed to South African legislation, in opcos out of South Africa, governance is adjusted to adhere to that particular country's legislation. 2019 SR: Mobiles and health, Networks and the environment, Environmental resources MTN's Position on mobiles and health: https://www.mtn.com/wp-content/uploads/2020/03/Eco-responsibility-Mobiles-and-Health.pdf MTN's Position on networks and the environment: https://www.mtn.com/wp-content/uploads/2020/03/Eco-responsibility-Networks-and-the-Environment.pdf	52, 60 and 61

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
103-2	The management approach and its components	MTN has a health and safety policy, which serves as a guideline to implement the health and safety management programme. The policy is supported with procedures that govern all activities that may pose a risk to employees, customers, business partners and visitors. All reporting on control measures is available to both internal top management and the government where it is required. 2019 SR: Mobiles and Health, Networks and the environment MTN's Position on mobiles and health: https://www.mtn.com/wp-content/uploads/2020/03/Eco-responsibility-Mobiles-and-Health.pdf MTN's Position on networks and the environment: https://www.mtn.com/wp-content/uploads/2020/03/Eco-responsibility-Networks-and-the-Environment.pdf	52, 60 and 61
103-3	Evaluation of the management approach	Health and safety audits are scheduled and conducted on a scheduled basis. Audits are conducted both internally and externally. All reports are recorded in the health and safety sharepoint. Updating of the action plan, where there are findings, is conducted on an ongoing basis. Follow-up audits are conducted, enabling the audit team to update the risk register accordingly. 2019 SR: Mobiles and health, Networks and the environment MTN's Position on mobiles and health: https://www.mtn.com/wp-content/uploads/2020/03/Eco-responsibility-Mobiles-and-Health.pdf MTN's Position on networks and the environment: https://www.mtn.com/wp-content/uploads/2020/03/Eco-responsibility-Networks-and-the-Environment.pdf	52, 60 and 61
416-1	Assessment of the health and safety impacts of product and service categories	Risk assessments were undertaken during 2019 for the following site categories: • Warehouses • Stores/retail shops • Corporate buildings • Call centre • Service centres • Repair centre • Switches and hubs • Site build (switches and energy centres under construction or under expansion due to network upgrades) • Network BTS tower maintenance and trenched sites for optic fibre installations (this is also assessed through an outsourced partner. We manage the compliance; therefore assess the reports; and approve the health and safety plans attached to the risk assessments compiled). Note: Risk assessments are carried out on individual sites on an ongoing basis.	N/A

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	All non-compliance findings are recorded in the risk register. MTN also has an occupational health and safety compliance risk monitoring framework, utilised to gauge compliance across business units. Emergency incidents are also recorded in the incident register.	
GRI 417: Marketing and labelling			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	18 and 19, 7 to 9
103-2	The management approach and its components	2019 IR: Best customer experience – performance 2019 SR: Human rights – empowering customers through fair treatment and mobile advertising controls	48 and 49, 37
103-3	Evaluation of the management approach	2019 IR: Best customer experience – performance 2019 SR: Human rights – empowering customers through fair treatment and mobile advertising controls	48 and 49, 37
417-1	Requirements for product and service information and labelling	2019 IR: Best customer experience – performance 2019 SR: Human rights – empowering customers through fair treatment and mobile advertising controls	48 and 49, 37
417-3	Incidents of non-compliance concerning marketing communications	In MTN South Africa, 11 communication-related matters were raised by individual consumers with the local Advertising Review Board (ARB). A total of eight of the 11 matters were resolved without a formal ruling or finding against MTN. A ruling was passed by the ARB for the remaining three matters. An agreement was reached with the complainant on two and a ruling was made in favour of MTN on the third. No complaints were brought against MTN in other operating markets.	N/A
GRI 418: Customer privacy			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	18 and 19, 7 to 9
103-2	The management approach and its components	2019 SR: Human rights – managing our customers' privacy rights. Enhancing information security	36 to 38
103-3	Evaluation of the management approach	2019 SR: Human rights – managing our customers' privacy rights. Enhancing information security	36 to 38
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	2019 SR: Human rights – managing our customers' privacy rights. Enhancing information security In 2019, an information security breach was detected in Afghanistan. The relevant regulator and law enforcement were informed.	36 to 38

MTN's GRI context index continued

Indicator	Disclosure	Reference and information	Page(s)
GRI 419: Socio-economic compliance			
103-1	Explanation of the material topic and its boundary	2019 IR: Material matters impacting value creation 2019 SR: Materiality process	18 and 19, 7 to 9
103-2	The management approach and its components	2019 IR: Our top risks to value creation 2019 SR: Corporate social investment	26 to 32 47 to 50
103-3	Evaluation of the management approach	2019 IR: Our top risks to value creation 2019 SR: Corporate social investment	26 to 33 47 to 50
419-1	Non-compliance with laws and regulations in the social and economic area	There were no significant administrative sanctions imposed on MTN for non-compliance with laws and regulations in the social and economic area.	N/A