MTN Group Limited
United Nations Global Compact
Communication of Progress (COP)
for the year ended
31 December 2013

MTN
everywhere you go

About the **MTN Group**

The MTN Group is a leading emerging markets operator, connecting subscribers in 22 countries in Africa and the Middle East. Our offerings include voice, data and internet services, cloud services, machine-to-machine monitoring technology, mobile money transactions, as well as numerous other mobile services (including mHealth, mEducation and mInsurance).

MTN is listed on the JSE Limited in South Africa under the share code "MTN". At 31 December 2013, MTN had 207,3 million subscribers across its operations in Afghanistan, Benin, Botswana, Cameroon, Cyprus, Ghana, Guinea Bissau, Guinea Republic, Iran, Ivory Coast, Liberia, Republic of Congo (Congo Brazzaville), Rwanda, South Africa, Sudan, South Sudan, Swaziland, Syria, Uganda, Yemen and Zambia.

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

Mission
To make our customers' lives a whole lot **brighter**.

The Global Mobile Economy

↑ *6,8 billion*
mobile cellular subscriptions in 2013

↑ *5,6%*
internet penetration in Africa

↑ *1 577 petabytes*
of monthly mobile broadband traffic

↑ *3,8 billion*
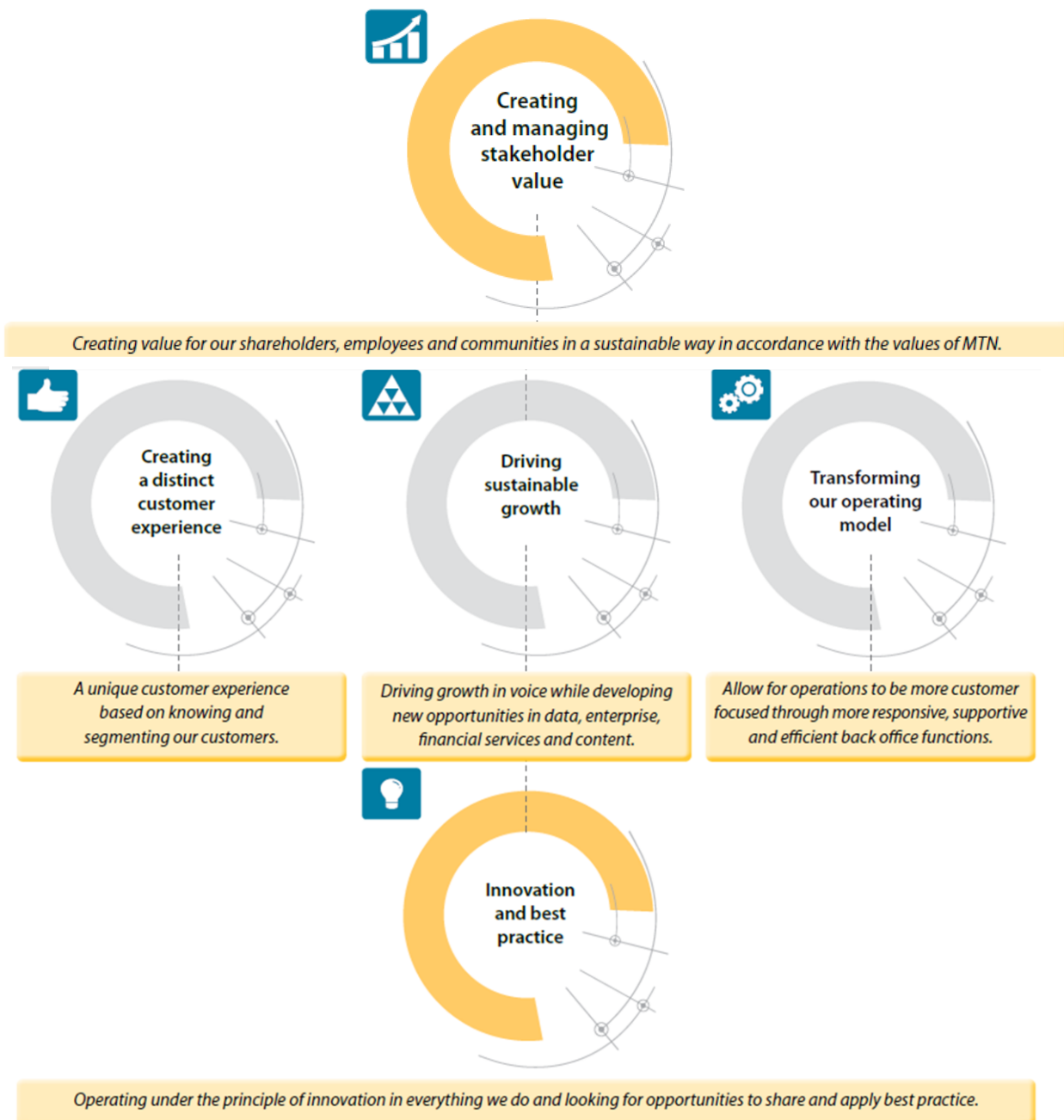*global mobile subscriptions from emerging markets*

↑ *US$10 billion*
international mobile remittances in 2013

↑ *1,2 billion*
M2M connected devices by 2017

Sources: Juniper Research, 2013 to 2018: The Mobile Economy 2013, by the GMSA.

Our strategy

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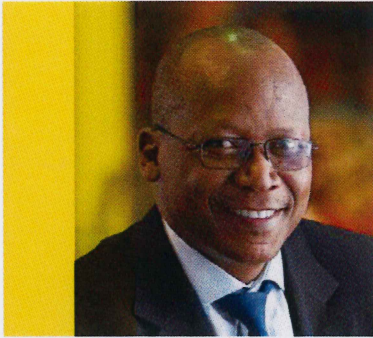
Creating and managing stakeholder value

Creating value for our shareholders, employees and communities in a sustainable way in accordance with the values of MTN.

Creating a distinct customer experience

A unique customer experience based on knowing and segmenting our customers.

Driving sustainable growth

Driving growth in voice while developing new opportunities in data, enterprise, financial services and content.

Transforming our operating model

Allow for operations to be more customer focused through more responsive, supportive and efficient back office functions.

Innovation and best practice

Operating under the principle of innovation in everything we do and looking for opportunities to share and apply best practice.

Contents

MTN Group Limited
Statement of Recommitment to the UNGC

Sifiso Dabengwa
Group President
and CEO

To our stakeholders

MTN was formed at the same time as the new and democratic South Africa. Those beginnings and the values of all South Africans at that time remain central to the way in which we do business. We operate mobile networks in 22 countries across Africa and the Middle East. Our goal is to lead the delivery of a bold, new digital world to our customers, to make our customers' lives a whole lot brighter. This we continue to do in ways that support the Ten Principles of the United Nations Global Compact.

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

In this 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.

Sincerely yours

SIFISO DABENGWA
GROUP PRESIDENT AND CEO
MTN GROUP

Scope of the COP

Materiality **and stakeholder inclusiveness**

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

The following sources were taken into account in determining materiality:

- Feedback from internal and external stakeholders who review MTN's annual Sustainability Report
- Engagement with external stakeholders via the addresses sustainability@mtn.com and investor_relations@mtn.co.za
- Communications with media organisations, civil society and community-based organisations, our customers, and general members of the public
- Feedback and engagement with the JSE SRI, the CDP, and MTN's investors who consult us or assess our responsible business performance
- Information from third-party questionnaires and assessments of our publicly reported performance by tertiary institutions and other third parties not commissioned by MTN
- Our own internal review and research processes including industry, peer and global developments, and our risk and audit management processes.

Issues identified through this process were weighted in an internal materiality review. Material issues were prioritized according to the scale and nature of impact on business operations, economic performance and stakeholder groups. These material issues are reviewed by the executive, and the Group business risk management and/or Group social and ethics committees.
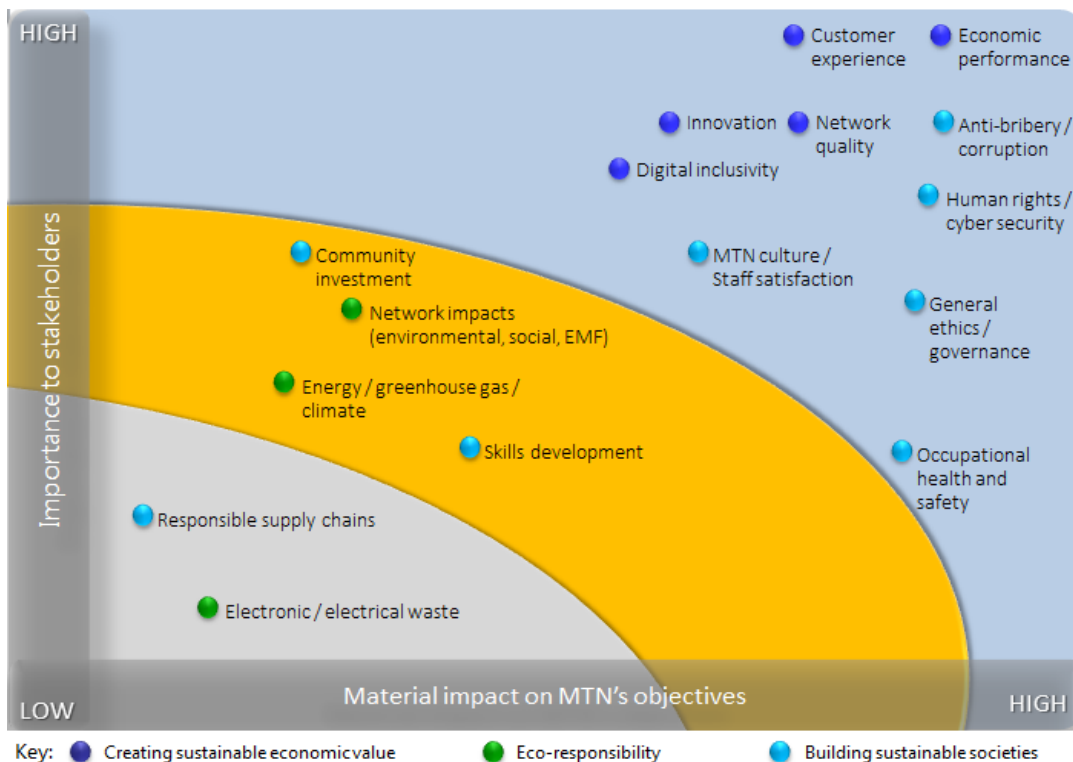
Sustainability **context**

MTN's new vision, introduced in 2012, is *'to lead the delivery of a bold, new Digital World to our customers'*. This is informed by the evolution of new information and communication channels that use digital platforms. We want to expand our presence in the digital space to ensure that our customers access a variety of content and information. This will help us deliver on our mission, which is *'to make our customers' lives a whole lot brighter'* through the implementation of our strategy.

Sustainability is the cornerstone of any successful business in the world today. One of our five strategic themes is to create and manage stakeholder value, and this is the one that most influences the way we do business sustainably. Our stakeholders – employees, civil society, regulators, and ethically focused investors and shareholders, among others – demand that we account for the organisation's responsible and sustainable performance.

Driving sustainable growth is another MTN strategic theme that links directly to sustainability, and involves the identification of products and services that can be introduced to our markets to meet the needs of our customers. There is much opportunity, through many of our products, to meet the specific societal, socio-economic or environmental needs of our customers, and we are proud of our role in helping close the digital divide.

In our new digital world, cloud and machine-to-machine services, MTN Mobile Money, mHealth, mInsurance, mEducation and even our ventures into the Big Data space complement the sustainability of the business as the demand for these services grows.

There is increasing awareness of new sources of sustainability risk and opportunity for the company. Each year we report that integrating sustainable business requirements is an ongoing journey for MTN, and various core business functions across MTN are undertaking the necessary actions in their business planning and operations more regularly. This is contributing to the realization of some of the themes that underpin our strategic vision.

The roll out and embedding of social and ethics management and governance and the associated policies, processes and procedures will continue. MTN will also continue to develop innovative products and services to make a positive societal or environmental difference while embedding our position in the global digital space.

MTN's sustainability awareness programme will be rolled out to more areas of the business, which should enhance the understanding and advance the integration of sustainability initiatives and programmes Group-wide.

UNGC **Communication of Progress** for 2013

The UN GRI G3 Guidelines and Telecommunications' Sector Supplement were used in preparation of this COP for 2013.

Global Reporting Initiative™

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

Abbreviations

- COP: Communication of Progress for the year ended 31 December 2013
- IR: MTN Group Limited Integrated Report for the year ended 31 December 2013
- SR: MTN Group Sustainability Report for the year ended 31 December 2013

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
HIGH-LEVEL COMMITMENT AND STRATEGY		
1.1	CEO statement on continued UNGC support	• COP: page 2 • IR: Group president and CEO's report, pages 50–53 • SR: Group president and CEO on sustainability, pages 4–5
1.2	Impacts, risks and opportunities	• IR: Risk and Opportunities page 18
CONTEXT OF OPERATION AND VERIFICATION		
2.1	Name of reporting organisation	• MTN Group Limited
2.2	Products, services	• https://www.mtn.com/offering/Pages/Solutions.aspx • http://www.mtnbusiness.com/
2.3	Operating structure	• IR: pages 2–3
2.4	Location of Headquarters	Phase 2 Building Innovation Centre 216 14th Avenue Fairland Roodepoort Gauteng South Africa
2.5	Geographic scope / map of operations	• IR: pages 2–3
2.6	Nature of ownership and legal form	• www.mtn.com/mtngroup/about/pages/structure.aspx
2.7	Profile of customer base	• www.mtn.com/offering
2.8	Scale of operations	• IR: pages 2–3 • SR: Report period and scope page 40
2.9	Changes occurring within the reporting period	• IR: Various sections including strategic path, leadership and governance and Group strategic analysis
2.10	Awards received	• Various on www.mtn.com including on homepage and press releases. Country-specific awards are separately noted on each MTN country of operations' websites, of which there are over 22, each representing the countries in which the Company operates e.g. www.mtn.co.za; www.mtn.co.za; www.mtn.com.gh, etc.
Assurance		
3.13	Process to provide independent verification for the COP / Policy on independent assurance	• IR: page 72 • SR: Independent Assurance Report pages 45–47

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Governance		
4.1	Company's governance structure (including major committees)	• IR: Group Board of Directors page 22 • SR: https://www.mtn.com/Sustainability/Pages/SustainabilityGovernanceDiagram.aspx • UNGC reporting at the AGM of MTN has been included in the terms of reference of the MTN Group Board's Social and Ethics Committee which was established in 2011 in response to the Companies Act of 2008.
4.2	Is the chairman also an executive officer?	No
4.3	Board profile: number, gender, Executive vs. Non-executive	• IR: Group Board of Directors page 22–31
4.4	How do stakeholders provide recommendations to Board?	• IR: Our stakeholders pages 10–11 • https://www.mtn.com/Sustainability/SustainableSociety/Pages/About2013Reports.aspx
4.5	Link between remuneration and leadership performance	• IR: Remuneration Report page 36
4.6	Managing conflicts of interest	• IR: Key governance developments page 28 • SR: Anti-corruption page 19
4.7	Process for determining leadership qualifications	• The board and Exco member's skills and qualifications are assessed during their recruitment process. Assessment of board skills is done on an on-going basis during board evaluation.
4.8	Internally developed mission / value statements, principles or codes related to sustainability	• IR: Non-financial information page 1 • SR: Sustainability Value Add Statement page 23
4.9	Board oversight of sustainability	• IR: Corporate governance pages 32–33 • www.mtn.com/Sustainability/Pages/SustainabilityGovernanceDiagram.aspx
4.10	Processes for evaluating the board's sustainability performance	• IR: Governance highlights, group secretary pages 32–33 • https://www.mtn.com/Sustainability/Pages/SustainabilityGovernanceDiagram.aspx
Stakeholder engagement		
4.14	List of stakeholder groups	• IR: Our stakeholders page 10 • SR: About this report page 42
4.15	How are stakeholders identified?	• IR: Our stakeholders page 10 • SR: About this report page 42
4.16	On-going mechanisms for stakeholder engagement: who, how, what outcome	• IR: Our stakeholders page 10 • SR: About this report page 42
4.17	Stakeholder concerns and how the organisation responded	• IR: Our stakeholders page 10 • SR: About this report page 42
	How MTN's Communication of Progress (COP) has been shared with our stakeholders	• Publicly on www.mtn.com • Via intranet on MtnConnnect
DISCLOSURES ON MANAGEMENT APPROACH		
Economic		
EC:MD	Management approach: economic performance, market presence and indirect economic aspects	• We operate at the heart of nations bursting with innovation, creativity and new ideas. We will continue to champion positive change. We are not First World or Third world - we believe we are operating in the new world, which is the Digital World. Working with integrity, we value our relationships with the communities in which we work, our customers and employees, our shareholders and the media, governments and regulators as well as supplies and business and industry partners. We recognise the importance of these stakeholders, among others, in the sustainability of our business. • IR: CEO statement pages 50–53 • SR: Sustainable economic value pages 7–11

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Economic performance		
EC1	Economic value added	• IR: How we create value page 12 • SR: Sustainable economic value pages 8–9
EC2	Climate change related financial implications, risks and opportunities	• SR: Eco-responsibility page 14
EC3	Defined benefit plan obligations	• IR: Remuneration report page 38
EC4	Significant financial assistance received from government	• MTN Group and its operations (excluding MTN South Africa) do not receive financial assistance from government • MTN South Africa contributes 1% of its annual payroll to the national Skills Development Levy. A 50% rebate on this contribution is received, and the company uses this to further training and skills development programmes
IO1	Capital investment in telecommunication network infrastructure broken down by country/region	• IR: Where we operate pages 2–3; Key statistics page 4
IO2	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 feature of in some of these markets
Market presence		
EC5	Standard entry level wage compared to local minimum wage	• The MTN Group pays entry level wages equal to or above local minimum wages in each country in which the Company operates
EC6	Policy, practices, and proportion of spending on locally-based suppliers	• SR: Annual Sustainability Statement (Black Economic Empowerment Scorecard) page 19
EC7	Procedures for local hiring : including senior management)	• The MTN Group hires locally as far as possible. Only 1.1% of the local staff base across the Group comprises expatriate members

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Access to telecommunications products and services: bridging the digital divide		
PA1	Policies and practices to enable the deployment of telecommunications infrastructure and access to telecommunications products and services in remote and low population density areas	• SR: Sustainable economic value pages 9–11 • As MTN operates in emerging markets across Africa and the Middle East, digital inclusion and core business are intertwined, and therefore providing service across all geographic locations, localities, languages, education and income levels, and other features of communities constitutes the normal business of the Company
PA2	Policies and practices and business model applied to overcome barriers for access and use of telecommunication products and services, including: language, culture, illiteracy and lack of education, low income, disabilities and age	• IR: Sustainable economic value pages 9–11 • As MTN operates in emerging markets across Africa and the Middle East, digital inclusion and core business are intertwined, and therefore providing service across all geographic locations, localities, languages, education and income levels and other features of communities, constitutes the normal business of the Company
PA3	Policies and practices to ensure availability and reliability of telecommunications products and services and quantify, where possible, for specified time periods and locations of down time	• SR: Annual sustainability statements (infrastructure availability) pages 25–26
PA4	The level of availability of telecommunications products and services in areas where MTN operates	• IR: Our risks page 18 • SR: Annual sustainability statements (infrastructure availability) pages 25–26
PA5	Number and types of telecommunication products and services provided to and used by low- and no-income sectors of the population, with definitions of these designated groups	• SR: Annual sustainability statements (infrastructure availability) pages 25–26 • As MTN operates in emerging markets across Africa and the Middle East, digital inclusion and core business are intertwined, therefore providing service across all geographic locations, localities, languages, education and income levels and other features of communities, constitutes the normal business of MTN
PA6	Programmes to provide and maintain telecommunication products and services in emergency situations and for disaster relief	• In Rwanda, MTN and Ericsson's Refugees Unite programme has been operating successfully for a number of years. In Iran, MTN Irancell offers a mobile private network for the National Disaster Management Organisation of Iran, using technology to reduce vulnerability to natural disasters. It enables the connection of special Irancell SIM cards to the local private network of the disaster management headquarters across the country and uses the extension numbers of all the disaster managers.
Indirect economic impacts		
EC8	Positive public impact of pro bono / donated infrastructure and services	• www.mtn.com/csi
EC9	Significant indirect economic impacts, including extent	• www.mtn.com/csi

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
ENVIRONMENTAL		
Indirect economic impacts		
EN:MD	Management approach: energy, water, materials, biodiversity, emissions, effluents, and waste	Our customers live in emerging countries that are resource-rich, but globally in countries that are amongst the most vulnerable to the effects of climate change. For this reason, we take our responsibility to address our environmental impact seriously. The three most material areas of impact where our efforts can have a less harmful impact on the environment are managing and reducing our greenhouse gas emissions, ensuring our network implementation is environmentally-sound, and responding to the global proliferation of electronic and electrical waste. We also know that we can use ICT solutions to help other companies reduce their environmental impact. • SR: Eco-Responsibility pages 13 - 16 • www.mtn.com/sustainability: MTN Group's Networks and Environment Position
Materials		
EN1	Materials used: weight / volume)	The most material resource used is electronic and electrical equipment. SR: Eco-responsibility page 16
EN2	Percentage of recycled materials used	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
Energy		
EN3	Direct energy use: by primary source)	• SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 • www.cdproject.net (MTN reports)
EN4	Indirect energy use: by primary source)	• SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 • www.cdproject.net (MTN reports)
EN5	Energy saved due to efficiencies	• SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 • www.cdproject.net (MTN reports)
EN6	Energy efficiency / renewable energy initiatives	• SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 • www.cdproject.net (MTN reports)
EN7	Initiatives to reduce indirect energy consumption	• SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 • www.cdproject.net (MTN reports)

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Water		
EN8	Total water withdrawal by source	Due to the nature of MTN's business, this indicator is not material. However, as part of the implementation of ISO 14001 in operations and LEED certification in MTN South Africa, responsible water management and use is addressed. Other operations, while not ISO14001-certified, maintain Safety Health and Environmental policies. As part of 2014's business plans all MTN countries of operation are reviewing environmental risks as a focus area in terms of the Group's principal risks
EN9	Water sources significantly affected by withdrawal of water	Not material as indicated above
EN10	Percentage and total water volume of water recycled and reused	Not material as indicated above
Biodiversity		
EN11	Location and size of land owned, leased or managed in biodiversity-rich habitats	The MTN Group does not currently report against this indicator
EN12	Impacts of operations on areas of high biodiversity value	• **www.mtn.com/sustainability:** MTN Group's Networks and Environment position
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. • **www.mtn.com/sustainability:** MTN Group's Networks and Environment position
EN14	How are impacts on biodiversity being managed?	• **www.mtn.com/sustainability:** MTN Group's Networks and Environment position
EN15	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. • **www.mtn.com/sustainability:** MTN Group's Networks and Environment position

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Emissions, effluents and wastes		
EN16	Total direct and indirect greenhouse gas emissions by weight	• IR: page 5 • SR: Eco-Responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 • **www.cdproject.net** (MTN reports)
EN17	Other relevant indirect greenhouse emissions by weight	• IR: page 5 • SR: Eco-Responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 • **www.cdproject.net** (MTN reports)
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved	• IR: page 5 • SR: Eco-Responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 • **www.cdproject.net** (MTN reports)
EN19	Emissions of ozone-depleting substances by weight	Due to the nature of MTN's business, this indicator is not material
EN20	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
EN21	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
EN22	Total amount of waste by type and disposal method	The most material waste generated is old / redundant is electronic and electrical equipment. • SR: Eco-responsibility page 16 and annual sustainability statement page 24
EN23	Total number and volume of significant spills	No significant spills were reported by MTN operations
EN24	Weight of transported, imported, exported or treated hazardous waste	Due to the nature of MTN's business, this indicator is not applicable
EN25	Water discharge impacts on biodiversity and water bodies	Due to the nature of MTN's business, this indicator is not material
Products and Services		
EN26	Initiatives to mitigate environmental impacts	• SR: Eco-responsibility pages 13 - 16 • **www.cdproject.net** (MTN reports)
EN27	Percentage of reclaimed products / packaging materials	• SR: Eco-responsibility page 16 and annual sustainability statement page 24

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Compliance		
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Apart from operations in Nigeria, no significant monetary fines and non-monetary sanctions for non-compliance with environmental laws and regulations have been reported. The environmental compliance situation experienced by MTN Nigeria was not specific to the Company, but a matter of broader political challenges of which all mobile network operators in Nigeria were subjected to, and were attributed to management issues in the mandates, roles and responsibility issues between the Federal Ministry of Environment (FME) and the National Environmental Standards and Regulations Enforcement Agency (NESREA), which are both tasked with environmental oversight in the country. Internal management complications relating to the respective authorities or roles between these two agencies resulted in unforeseen impact on the national telecommunications operators' industry, and were not specific to the actions of any single network operator. As a result, in 2009 NESREA elected to shut down a number of network sites of all operators without following due legal, regulatory and stakeholder engagement processes. In 2013 a joint committee of the Federal Ministries of Environment and Communications Technology, NESREA and the Nigerian Communications Commission was convened and a Memorandum of Understanding brokered, which is hoped to improve environmental regulatory management of the national telecommunications sector. MTN was the first operator to embark on an Environmental Impact Assessment (EIA) of operations across Nigeria, and was granted its EIA certificate in 2004. In 2009 MTN Nigeria was one of the network operators which submitted over 15,000 Environmental Assessment Reports to NESREA to provide evidence of environmental compliance. In early 2014 the Federal Government also agreed on environmental procedural guidelines for 170 BTS rollouts as part of MTN Nigeria's capital expansion programme.
Transport		
EN29	Significant environmental impacts of transport use : for products, materials, members of the workforce)	Although transportation is not a source of significant environmental impacts and is not deemed material, greenhouse gas emissions associated with transport are quantified. • SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement page 24 • www.cdproject.net (MTN reports)
Overall		
EN30	Environmental protection expenditure	The MTN Group does not track this indicator.
IO7	Policies and practices on the siting of masts and transmission sites including stakeholder consultation, site sharing and initiatives to reduce visual impacts.	• www.mtn.com/sustainability/ MTN Group's Networks and Environment position paper, and Mobile and Health position paper
IO8	Number and percentage of stand-alone sites, shared sites and sites on existing structures.	• IR: Where we operate – Percentage 2G, 3G, WiMax and LTE sites pages 2 - 3

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Resource efficiency		
TA1	Provide examples of the resource efficiency of telecommunication products and services delivered	• SR: Sustainable Economic Value: Cloud computing and M2M page 8 • www.mtn.com/sustainability/pages/case studies.aspx • www.cdproject.net (MTN reports)
TA2	Provide examples of telecommunication products, services and applications that have the potential to replace physical objects	• SR: Sustainable Economic Value: Cloud computing and M2M page 8 • www.mtn.com/sustainability/pages/case studies.aspx • www.cdproject.net (MTN reports)
TA3	Disclose any measures of transport and/or resource changes of customer use of the telecommunication products and services listed above. Provide some indication of scale, market size or potential savings	• www.mtnbusiness.co.za; www.mtnbusiness.com.ng and www.mtn.com.sy Mobile Fleet Management Service/ Solution
TA4	Disclose any estimates of the rebound effect: indirect consequences) of customer use of the products and services listed above, and lessons learned for future development. This may include social consequences as well as environmental.	Not available
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	• The MTN Group recognises that to achieve its strategic objectives and vision to lead the delivery of a bold new digital world to its customers, the Group needs appropriately skilled, culturally diverse employees who are motivated by and enjoy their work • SR: Sustainable Societies – employee Health and Safety page 21 and annual sustainability statement page 24 • MTN provides learning and development opportunities to all employees, and specifically through its e-Live e-learning offerings makes it possible for every employee to undertake learning and development as part of more comprehensive career management; the MTN Academy is instrumental in providing comprehensive learning and development services to all operations through its three regional learning centres in South Africa, Dubai and Ghana • The Group is embedding its new Cultural Operating System (COS) across all operations
Employment		
LA1	Employee numbers	• SR: Annual sustainability statement page 24
LA2	Employee turnover	• SR: Annual sustainability statement page 24
LA3	Full-time employee benefits not provided to temporary / part-time employees	• IR: Remuneration structure page 37 - 38
Labour/Management relations		
LA4	Percentage unionised employees	• Not available
LA5	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.

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Occupational health and safety		
LA6	Employee representation in health and safety committees	• SR: Annual sustainability statement page 24
LA7	Total number of work-related fatalities, rates of injury, occupational diseases, lost days and absenteeism	• SR: Annual sustainability statement page 24
LA8	Employee wellness programmes regarding serious diseases	• Not available
LA9	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	• www.mtn.com/sustainability MTN Group's Mobile and Health position
Training and education		
LA10	Average hours of training per employee per year	• SR: Annual sustainability statement page 24
LA11	Employee skills and training programmes	• SR: Annual sustainability statement page 24
LA12	% employees receiving performance reviews and career development	• SR: Annual sustainability statement page 24
Diversity and equal opportunity		
LA13	Composition of governance bodies	• IR: Governance pages 24 - 28
LA14	Ratio of basic salary of men to women by employee category	The MTN Group does not currently report against this indicator
LA15	Return to work and retention rates after parental leave, by gender	The MTN Group does not currently report against this indicator
HUMAN RIGHTS		
Disclosure on management approach		
HR:MD	Management approach: investment and procurement practices, non-discrimination, freedom of association and collective bargaining, abolition of child labour, prevention of forced and compulsory labour, complaints and grievance practices, security practices, and indigenous rights	• The MTN Group adheres to specifications with respect to the International Labour Organisation Protocol on decent work and working conditions (core standards of freedom of association, forced labour, child labour, anti-discrimination). These requirements are integrated broadly in the MTN Group Code of Ethics, and are included in the Group Social and Ethics Committee's terms of reference.
Investment and procurement activities		
HR1	Percentage and number of significant investments that have undergone human rights screening	• 0%
HR2	Percentage of significant suppliers and contractors that have undergone human rights screening	• 0%
HR3	Total hours and number of employees receiving human rights training	• 0%
Non-discrimination		
HR4	No of incidents of discrimination and action taken	The MTN Group does not currently report against this indicator

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Freedom of association and collective bargaining		
HR5	Any incidents where freedom of association / collective bargaining was at risk? Actions taken?	The MTN Group does not currently report against this indicator
Child Labour		
HR6	Any incidents of child labour and measures taken?	In 2011 the MTN Group specifically assessed whether it was compliant with the ILO child labour minimum age specification, and found that it was, with youngest employee was 17 years of age at the time. As part of a basic human resources management information data-gathering process currently underway, this indicator will be assessed in 2014.
Forced and compulsory labour		
HR7	Any incidents of forced labour and measures taken?	No incidents
Security practices		
HR8	Percentage of security personnel trained in human rights	Due to the nature of MTN's business, this indicator is not applicable
Indigenous rights		
HR9	Any incidents where indigenous people's rights were violated and measures taken?	No incidents
HR10	Percentage and total number of operations that have undergone human rights reviews	0% in terms of indigenous rights
HR11	Number of human rights grievances filed, and resolved through formal mechanisms	The MTN Group does not track this indicator
SOCIETY		
Disclosure on management approach		
SO:MD	Management approach: community, corruption, public policy, anti-competitive behaviour and compliance	• IR: Various statements in Chairman's statement page 25 and Group President and CEO statement page 53 • SR: Sustainable Societies – Anti-corruption page 19 • www.mtn.com/sustainability: MTN Group's Anti-corruption position
Community		
SO1	Percentage of operations with 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
Access to content		
PA7	Policies and practices to manage human rights issues relating to access and use of telecommunications products and services	• SR: Sustainable Societies page 19 • www.mtn.com/sustainability: MTN Group's Human Rights and ICT position

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
Corruption		
SO2	Business units analysed corruption risks	• SR: Sustainable societies (anti-corruption) page 19
SO3	Employee training regarding anti-corruption	• SR: Sustainable societies (anti-corruption) page 19 and Annual sustainability statement page 24
SO4	Actions taken in response to incidents of corruption	Due disciplinary processes are followed to investigate and resolve matters of ill-discipline including corruption. Sanctions may range from warnings to termination of employment
Public policy		
SO5	Engagement in public policy	Public policy engagement is undertaken in the following means: • Via any matters of consideration by the GSMA Board, due to the fact that the Group's President and CEO is a member of this Board • Via the necessary regulatory agency either in formal public commentary invitation processes, or as required for possible emerging regulation or industry-specific matters such as carbon taxes, spectrum allocation, etc. (MTN operations may engage directly with the necessary regulatory agency, or collectively via national business or industry associations)
SO6	Financial / in-kind contributions to political parties	MTN is a 20-year old company, having commenced its business operations at the dawn of South Africa's democracy in 1994. As a proudly South African company, founded on the values of our nation's democratic vision, MTN is supportive of efforts to strengthen South Africa's multiparty democracy. Accordingly, the Group has made funding available to 13 political parties currently represented in parliament, as they prepare to take part in the 7 May 2014 general elections. The funding is in line with the MTN Code of Ethics and Corporate Political Contributions Policy. In determining the allocations, MTN followed the Independent Electoral Commission's model of proportional representation in parliament, based on the outcome of the 2009 general elections. We believe that political parties need resources to participate in elections, and extending funding to these organisations is critical to ensuring a vibrant and democratic society.
Anti-competitive behaviour		
SO7	Number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	None
Compliance		
SO8	Monetary value of significant fines and number of non-monetary sanctions for non-compliance with regulations	Telecommunication regulators in some of the countries in which MTN operates have threatened or imposed quality of service fines upon MTN based on network performance standards. Although this information is available in the public domain, we have not quantified the value of these fines for the purposes of this report
SO9	Operations with significant negative impacts on local communities.	None
SO10	Prevention and mitigation of significant negative impacts on local communities, by operation	• www.mtn.com/sustainability: MTN Group's Networks and Environment position
TA5	Description of practices relating to intellectual property rights and open-source technologies	The MTN Group upholds intellectual property rights in its business operations

G3.1 Disclosure #	UNGC reporting requirement	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
PRODUCT RESPONSIBILITY		
Disclosure on management approach		
PR:MD	Management approach: customer health and safety, product and service labelling, marketing communications, customer privacy, and compliance.	• SR: Sustainable Societies – Human Rights and ICT page 20 • **www.mtn.com/sustainability:** MTN Group's Human Rights and ICT position and on Mobiles and Health
Customer health and safety		
PR1	Life cycle stages of products / services assessed for health and safety impacts : incl. % of products / services assessed)	• **www.mtn.com/sustainability:** MTN Group's position on Mobiles and Health
PR2	Incidents of regulatory non-compliance concerning health and safety impacts of products and services	Not available
PA8	Policies and practices to publicly communicate on EMF related issues	• **www.mtn.com/sustainability:** MTN Group's position on Mobiles and Health
PA9	Total amount invested in programmes and activities in electromagnetic field research	Not available
Product and service labelling		
PR3	Product / service information required by procedures	None
PR4	Incidents of regulatory non-compliance concerning product and service information labelling	None
PR5	Customer satisfaction practices: surveys etc.)	The MTN Market Performance Report (MPR) is an extensive assessment tool used by our operations to gauge market perceptions and customer experience and perceptions across a number of business dimensions related to network, service, functionality, value, and other indicators, and is reported to the Group Executive on a quarterly basis.
Marketing communications		
PR6	Adherence to marketing, promotions and communications standards	The MTN Group ensures that it complies with local laws, standards and codes.
PR7	Incidents of regulatory non-compliance concerning marketing communications	No incidents have been reported by operations
PA10	Initiatives to ensure clarity of charges and tariffs	None
PA11	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		
PR8	Incidents of substantiated breaches of customer privacy and losses of customer data	• SR: Sustainable Societies – Human Rights and ICT page 20

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

Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights	**Actions taken to implement Principle 1**
		• *HR3 - Total hours and number of employees receiving human rights training:*
		0%
		• *HR8 - Percentage of security personnel trained in human rights:*
		Due to the nature of MTN's business, this indicator is not applicable
		• *HR10 - Percentage and total number of operations that have undergone human rights reviews*
		0% in terms of indigenous rights
		• *SO1 - Percentage of operations with local community engagement, impact assessments, and development programs:*
		  o 68 % of MTN operations (15 countries) have a formal Foundation.
		  o 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
		• *SO9 - Operations with significant negative impacts on local communities:*
		None
		• *SO10 - Prevention and mitigation of significant negative impacts on local communities, by operation:*
		www.mtn.com/sustainability: MTN Group's Networks and Environment position
		
		Outcomes from implementing Principle 1
		• *HR9 - Any incidents where indigenous people's rights were violated and measures taken?*
		No incidents
		• *HR11 - Number of human rights grievances filed, and resolved through formal mechanisms*
		The MTN Group does not track this indicator

Principle 2	Businesses should make sure that they are not complicit in human rights abuses	**Actions taken to implement Principle 2** • *HR2 - Percentage of significant suppliers and contractors that have undergone human rights screening:* 0% **Outcomes from implementing Principle 2** • *Hr1 - Percentage and number of significant investments that have undergone human rights screening:* 0%

UNGC Principle	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
LABOUR	
Principle 3 Businesses should uphold the freedom of association and the effective recognition to the right to collective bargaining	**Actions taken to implement Principle 3** • *LA5 - 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. Outcomes from implementing Principle 3 • *LA4 - Percentage unionised employees* Not available • *HR5 - Any incidents where freedom of association / collective bargaining was at risk? Actions taken?* The MTN Group does not currently report against this indicator
Principle 4 The elimination of all forms of forced and compulsory labour	**Actions taken to implement Principle 4** • *HR7 - Any incidents of forced labour and measures taken?* No incidents
Principle 5 The effective abolition of child labour	**Actions taken to implement Principle 5** • *HR6 - Any incidents of child labour and measures taken?* In 2011 the MTN Group specifically assessed whether it was compliant with the ILO child labour minimum age specification, and found that it was, with youngest employee was 17 years of age at the time. As part of a basic human resources management information data-gathering process currently underway, this indicator will be assessed in 2014.
Principle 6 The elimination of discrimination in respect of employment and occupation	**Actions taken to implement Principle 6** • *EC7 – Procedures for local hiring: including senior management:* The MTN Group hires locally as far as possible. Only 1.1% of the local staff base across the Group comprises expatriate members • *LA1 - Employee numbers* SR: Annual sustainability statement page 24 • *LA2 - Employee turnover* SR: Annual sustainability statement page 24 • *LA10 - Average hours of training per employee per year* SR: Annual sustainability statement page 24 • *LA12 - % employees receiving performance reviews and career* development SR: Annual sustainability statement page 24 • *LA13 - Composition of governance bodies* IR: Governance pages 24 - 28 • *LA14 - Ratio of basic salary of men to women by employee category* The MTN Group does not currently report against this indicator • *LA15 - Return to work and retention rates after parental leave, by gender* The MTN Group does not currently report against this indicator • *HR4 - Number of incidents of discrimination and action taken:* The MTN Group does not currently report against this indicator Outcomes from implementing Principle 6 • *EC5 – Standard entry level wage compared to local minimum wage:* The MTN Group pays entry level wages equal to or above local minimum wages in each country in which the Company operates

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

ENVIRONMENT		
Principle 7	Businesses should support a precautionary approach to environmental challenges	Actions taken to implement Principle 7 • *EC2 – Climate change-related financial implications, risks and opportunities:* SR: Eco-responsibility page 14 • *EN26 - Initiatives to mitigate environmental impacts* SR: Eco-responsibility pages 13 – 16; www.cdproject.net (MTN reports) • *EN27 - Percentage of reclaimed products / packaging materials* SR: Eco-responsibility page 16 and annual sustainability statement page 24 • *EN30 - Environmental protection expenditure:* The MTN Group does not track this indicator. Outcomes from implementing Principle 7 • *EN1 – Materials used: weight/volume* The most material resource used is electronic and electrical equipment. SR: Eco-responsibility page 16) • *EN3 – Direct energy use: by primary source* SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 **www.cdproject.net** (MTN reports) • *EN8 - Total water withdrawal by source:* Due to the nature of MTN's business, this indicator is not material. However, as part of the implementation of ISO 14001 in operations and LEED certification in MTN South Africa, responsible water management and use is addressed. Other operations, while not ISO14001-certified, maintain Safety Health and Environmental policies. As part of 2014's business plans all MTN countries of operation are reviewing environmental risks as a focus area in terms of the Group's principal risks • *EN16 – Total direct and indirect greenhouse gas emissions by weight:* IR: page 5 SR: Eco-Responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24; **www.cdproject.net** (MTN reports) • *EN19 - Emissions of ozone-depleting substances by weight:* Due to the nature of MTN's business, this indicator is not material • *EN20 - 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 • *EN21 - 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 • *EN22 - Total amount of waste by type and disposal method* The most material waste generated is old / redundant is electronic and electrical equipment. SR: Eco-responsibility page 16 and annual sustainability statement page 24 • *EN23 - Total number and volume of significant spills* No significant spills were reported by MTN operations • *EN24 - Weight of transported, imported, exported or treated hazardous waste* Due to the nature of MTN's business, this indicator is not applicable • *EN25 - Water discharge impacts on biodiversity and water bodies* Due to the nature of MTN's business, this indicator is not material

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

ENVIRONMENT *(continued)*

UNGC Principle		MTN's Response
		Actions taken to implement Principle 8
		• *EN6 - Energy efficiency / renewable energy initiatives*
		SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24; **www.cdproject.net** (MTN reports)
		• *EN7 - Initiatives to reduce indirect energy consumption*
		SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24; **www.cdproject.net** (MTN reports)
		• *EN14 – How impacts on biodiversity are being managed*
		www.mtn.com/sustainability: MTN Group's Networks and Environment position
		• *EN18 - Initiatives to reduce greenhouse gas emissions and reductions achieved*
		IR: page 5
		SR: Eco-Responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24; **www.cdproject.net** (MTN reports)
		• *EN26 - Initiatives to mitigate environmental impacts*
		SR: Eco-responsibility pages 13 – 16; www.cdproject.net (MTN reports)
		• *EN30 - Environmental protection expenditure:*
		The MTN Group does not track this indicator.
		Outcomes from implementing Principle 8
		• *EN1 – Materials used: weight/volume*
		The most material resource used is electronic and electrical equipment.
		SR: Eco-responsibility page 16
Principle 8	Undertake initiatives to promote greater environmental responsibility	• *EN2 – Percentage of recycled materials used:*
		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
		• *EN3 – Direct energy use: by primary source*
		SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24
		www.cdproject.net (MTN reports)
		• *EN4 – Indirect energy use: by primary source*
		SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24
		www.cdproject.net (MTN reports)
		• *EN5 – Energy saved due to efficiencies*
		SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24
		www.cdproject.net (MTN reports)
		• *EN8 - Total water withdrawal by source:*
		Due to the nature of MTN's business, this indicator is not material. However, as part of the implementation of ISO 14001 in operations and LEED certification in MTN South Africa, responsible water management and use is addressed. Other operations, while not ISO14001-certified, maintain Safety Health and Environmental policies. As part of 2014's business plans all MTN countries of operation are reviewing environmental risks as a focus area in terms of the Group's principal risks
		• *EN9 - Water sources significantly affected by withdrawal of water:*
		Not material

UNGC Principle	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
ENVIRONMENT - *Principle 8 Outcomes (continued)*	

		• *EN10 - Percentage and total water volume of water recycled and reused:* Not material • *EN11 - Location and size of land owned, leased or managed in biodiversity-rich habitats:* The MTN Group does not currently report against this indicator • *EN12 - Impacts of operations on areas of high biodiversity value:* www.mtn.com/sustainability: MTN Group's Networks and Environment position • *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. (www.mtn.com/sustainability: MTN Group's Networks and Environment position) • *EN15 - 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. (www.mtn.com/sustainability: MTN Group's Networks and Environment position) • *EN16 – Total direct and indirect greenhouse gas emissions by weight:* IR: page 5 SR: Eco-Responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 www.cdproject.net (MTN reports) • *EN17 - Other relevant indirect greenhouse emissions by weight* IR: page 5 SR: Eco-Responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 www.cdproject.net (MTN reports) • *EN19 - Emissions of ozone-depleting substances by weight:* Due to the nature of MTN's business, this indicator is not material • *EN20 - 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 • *EN21 - 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 • *EN22 - Total amount of waste by type and disposal method* The most material waste generated is old / redundant is electronic and electrical equipment. SR: Eco-responsibility page 16 and annual sustainability statement page 24 • *EN23 - Total number and volume of significant spills* No significant spills were reported by MTN operations • *EN24 - Weight of transported, imported, exported or treated hazardous waste* Due to the nature of MTN's business, this indicator is not applicable • *EN25 - Water discharge impacts on biodiversity and water bodies* Due to the nature of MTN's business, this indicator is not material • *EN27 - Percentage of reclaimed products / packaging materials* SR: Eco-responsibility page 16 and annual sustainability statement page 24 • *EN28 - Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations:*
Principle 8	Undertake initiatives to promote greater environmental responsibility	

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

ENVIRONMENT - *Principle 8 Outcomes (continued)*

Principle 8	Undertake initiatives to promote greater environmental responsibility	Apart from operations in Nigeria, no significant monetary fines and non-monetary sanctions for non-compliance with environmental laws and regulations have been reported. The environmental compliance situation experienced by MTN Nigeria was not specific to the Company, but a matter of broader political challenges of which all mobile network operators in Nigeria were subjected to, and were attributed to management issues in the mandates, roles and responsibility issues between the Federal Ministry of Environment (FME) and the National Environmental Standards and Regulations Enforcement Agency (NESREA), which are both tasked with environmental oversight in the country. Internal management complications relating to the respective authorities or roles between these two agencies resulted in unforeseen impact on the national telecommunications operators' industry, and were not specific to the actions of any single network operator. As a result, in 2009 NESREA elected to shut down a number of network sites of all operators without following due legal, regulatory and stakeholder engagement processes. In 2013 a joint committee of the Federal Ministries of Environment and Communications Technology, NESREA and the Nigerian Communications Commission was convened and a Memorandum of Understanding brokered, which is hoped to improve environmental regulatory management of the national telecommunications sector. MTN was the first operator to embark on an Environmental Impact Assessment (EIA) of operations across Nigeria, and was granted its EIA certificate in 2004. In 2009 MTN Nigeria was one of the network operators which submitted over 15,000 Environmental Assessment Reports to NESREA to provide evidence of environmental compliance. In early 2014 the Federal Government also agreed on environmental procedural guidelines for 170 BTS rollouts as part of MTN Nigeria's capital expansion programme. • *EN29 - Significant environmental impacts of transport use : for products, materials, members of the workforce):* Although transportation is not a source of significant environmental impacts and is not deemed material, greenhouse gas emissions associated with transport are quantified. SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement page 24; www.cdproject.net (MTN reports)
Principle 9	Encourage the development and diffusion of environmentally friendly technologies	Actions taken to implement Principle 9 • *EN6 - Energy efficiency / renewable energy initiatives:* SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 **www.cdproject.net** (MTN reports) • *EN7 - Initiatives to reduce indirect energy consumption* SR: Eco-responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 **www.cdproject.net** (MTN reports) • *EN18 - Initiatives to reduce greenhouse gas emissions and reductions achieved* IR: page 5 SR: Eco-Responsibility – energy, carbon and climate; annual sustainability statement pages 13 – 15; page 24 **www.cdproject.net** (MTN reports) • *EN26 - Initiatives to mitigate environmental impacts* SR: Eco-responsibility pages 13 – 16; www.cdproject.net (MTN reports) • *EN30 - Environmental protection expenditure:* The MTN Group does not track this indicator.

UNGC Principle	MTN's Response *(Document, Section, Page Number or additional information on www.mtn.com)*
ANTI-CORRUPTION	
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery

Actions taken to implement Principle 10

- *SO4 - 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
- *SO5 - Engagement in public policy:*

  Public policy engagement is undertaken in the following means:
  - Via any matters of consideration by the GSMA Board, due to the fact that the Group's President and CEO is a member of this Board
  - Via the necessary regulatory agency either in formal public commentary invitation processes, or as required for possible emerging regulation or industry-specific matters such as carbon taxes, spectrum allocation, etc. (MTN operations may engage directly with the necessary regulatory agency, or collectively via national business or industry associations)

Outcomes from implementing Principle 10

- *SO2 - Business units analysed corruption risks:*
  SR: Sustainable societies (anti-corruption) page 19
- *SO3 - Employee training regarding anti-corruption:*
  SR: Sustainable societies (anti-corruption) page 19 and Annual sustainability statement page 24

everywhere you go