

REPORT ON EVIDENCE COLLECTION

1. INTRODUCTION

1.1 This report provides an overview of the evidence collection and fact-finding in connection with the Hoffmann Committee investigation, summarizing the steps taken to collect and review documentary and testimonial evidence. The scope of the Committee's investigation has been limited to the specific allegations made by Turkcell in the complaint that Turkcell filed on 28 March 2012.

2. EVIDENCE COLLECTION AND REVIEW

2.1 In light of the allegations made by Turkcell, MTN took steps to secure and preserve any relevant documents. Material of potential relevance to the Hoffmann Committee was then gathered from more than 40 custodians in the form of hard copy documents, electronic documents (including emails and documents saved to hard drives and other electronic media), and interviews. The sources of this material include current and former MTN employees, consultants, contractors, members of the Board of Directors, and other individuals who may have had knowledge of the allegations presented in the complaint.

2.2 *Hard Copy Documents*

2.2.1 Most of the hard copy documents that were collected were scanned and then filtered through the use of computer operated searches using selected search terms. Those documents containing relevant search terms were reviewed. The minority of the hard copy documents that were not initially scanned were reviewed in hard copy and in some cases were subsequently scanned. The hard copy documents were collected from the following sources:

2.2.1.1 MTN's offices in Johannesburg, including boxes of documents that had previously been located in MTNI's branch office in Tehran.

2.2.1.2 16 individual custodians.

2.2.1.3 external archives.

2.3 *Electronic Documents*

2.3.1 Approximately 6,597 gigabytes of electronic data relating to certain custodians' hard drives, email repositories, and other electronic data sources was collected and imaged. Upon the application of certain date-range filters and electronic de-duplication techniques, approximately 658 gigabytes of data (2.7 million documents, excluding email attachments) were identified for searching from 42 potential custodians, including current and former MTN employees, contractors, or consultants as well as certain current or former members of MTN's Board. Those documents were filtered through the use of

computer-operated searches using selected search terms and manual review of file names. These filters yielded approximately 781,000 potentially relevant documents, all of which were manually reviewed.

2.3.2 This electronic data was collected from the following sources:

2.3.2.1 MTN's e-mail exchange archiving server, which contains data from 2007 through 2012. It also contains data predating 2007 for custodians who possessed electronic data when the exchange archiving server commenced archiving in 2007. E-mails for 36 current and former MTN employees, amounting to 256 gigabytes of data, were collected.

2.3.2.2 MTN's file server, which contains data from 2004 through 2012, amounting to 14 terabytes of data.

2.3.2.3 Laptop, desktop, and other media storage devices (e.g. flash drives and disks) from 21 custodians. Those devices were imaged, yielding 25 hard drive images as well as images of 15 other media storage devices.

2.3.2.4 Images that had been collected from certain MTN executives' computers in 2006, yielding 12 images, amounting to approximately 213 gigabytes of compressed data.

2.4 ***Interviews***

2.4.1 Interviews were conducted with 23 potential custodians who were either (i) current or former employees or consultants or (ii) current or former members of MTN's Board of Directors. In addition, interviews were conducted with five additional individuals outside of MTN's employ. Those interviews addressed factual issues and/or document retention and collection issues.

2.5 ***Documents Related to the Deposition of Christian Kilowan***

2.5.1 In advance of the deposition of Christian Kilowan, Turkcell provided approximately 859 documents belonging to MTN which Mr. Kilowan had taken from MTN upon his resignation. The documents consisted of approximately 7,131 pages, all of which were reviewed.

2.6 ***Other Sources of Data***

2.6.1 A limited number of hard copy and/or electronic documents were also collected from various other sources and reviewed.