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.

Three pillars of MTN’s sustainability

<table>
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<tr>
<th>Sustainable economic value</th>
<th>Sustainable societies</th>
<th>Eco-responsibility</th>
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<tbody>
<tr>
<td>Digital and financial innovation that enhances lives in society</td>
<td>Support vibrant, successful communities</td>
<td>Reduce our environmental impact</td>
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| - Digital and financial solutions to close the digital and financial divide | - 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 | - 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 |

Everyone deserves the benefit of a modern connected life
Frequently Asked Questions on Digital Human Rights (Online Freedom of Expression, Privacy and Security)

We believe in the rights of all people using digital communications to freely communicate and share information and opinions, and to enjoy the right to privacy and information security without interference. We endeavour to protect the rights of all people using our services in the respective jurisdictions in which we operate.

**Frequently Asked Questions**

- **Is there senior leadership oversight over Digital Human Rights matters?**
  Governance of Digital Human Rights is overseen by the Group Social and Ethics Committee on behalf of the MTN Group Board. It is tracked on an on-going basis by the Group Executive Committee led by the MTN Group President and Chief Executive Officer (see our sustainability governance structure below). Regional Vice Presidents and Country CEOs play a key role at a country and regional level.

- **What steps does MTN take when requested to shut down the internet?**
  MTN undertakes a robust due diligence approach including: 1) Request validation and determining the urgency and impact of the request; 2) Request assessment to confirm if request is official, from legally authorised body, compliant to law and/or license terms, implications on rights, human lives and other factors; 3) Explore and act upon all possible options (seek request amendment, set aside, reject where possible, partially comply and as last resort comply with request); 4) Explore and act upon all possible options; and 5) Provide remedies where relevant, monitor request to ensure compliance and provide updates to relevant stakeholders.

- **Why does MTN choose to keep operating in conflict markets?**
  We see significant potential in our markets to offer vital communication services despite some of the inherent risks. Such risks are factors of doing business in these markets and are not limited to MTN. We are continuously evolving and innovating our risk framework and the way we conduct our business. We also transfer lessons from one market to another on an ongoing basis.

- **Does MTN conduct human rights risk and impact assessments?**
  Impact assessments are a key element in MTN’s due diligence framework and risk assessments. Due to the evolving nature of risks in digital communications, we update our risks and impact assessments on a periodical basis. Human rights forms part of the various factors that is taken into consideration as we conduct our business.

- **Does MTN offer remedies to customers affected by incidents such as the restriction of freedom of expression?**
  Yes, MTN has offered data refunds or offers of free data/airtime to customers affected when access to communications is restricted in certain situations.

- **Does MTN publish requests made by government or private entities to restrict access or requests for user information?**
  MTN continues to benchmark and evolve our disclosure and transparency mechanisms to respond to the needs of our stakeholders. While there are legal restrictions on publishing this information for a number of the countries in which we operate, we note that transparency of this nature is an important aspect of good corporate governance and stakeholder engagement.

**Our sustainability governance and reporting structure**

- **Group social and ethics committee**
  Reporting frequency: every three months

- **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
Frequently Asked Questions on energy, climate and environmental resources

MTN is continuously works to reduce our own impacts by understanding our energy consumption and its drivers, managing anomalies and rectifying issues as they arise. MTN applies precautionary principle in its use of natural resources, including energy and water.

Frequently Asked Questions

What is MTN’s policy and approach on managing its energy use and climate impacts?
MTN’s strategy to reduce our energy use and greenhouse gas emissions is to continually seek opportunities to extract greater efficiencies in from our technical infrastructure, and by replacing inefficient and old products with more efficient solutions. We also invest in renewable energy sources. We monitor energy consumption on an ongoing basis to identify any problems that may drive sudden increases in energy usage.

What is the biggest challenge that MTN faces where it comes to reducing its emission?
Close to half of MTN’s energy use and greenhouse gas emissions is not within our control, as a result of our network tower outsourcing strategy. Infrastructure partners are therefore critical in helping us to reduce our energy use directly (for energy on MTN owned or controlled infrastructure) and indirectly (on leased infrastructure). We continually engage with vendors to manage consumption and emissions e.g. by undertaking energy management trials.

What types of initiatives does MTN undertake?
Our network infrastructure consumes approximately 96% of the total energy we use. We consume energy from diesel, gas, coal and hydro-powered national grids, and directly generate energy from solar and wind. Our strategy is to mitigate our climate impact is to continually seek opportunities to extract energy efficiencies where possible and to maintain investment in renewable sources of energy. Other initiatives such as those related to the IoT and prepaid solar energy systems for customers also allow us to leverage digital technologies to support the growth of green economies.

What targets has MTN set for reducing greenhouse gas emissions/ why does MTN not disclose targets?
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Does MTN support any initiatives to reduce carbon emissions?
MTN Group supports the goals of GSMA-led initiative as the company is cognisant of the potential of the ICT and telecommunications sector to contribute to de-carbonisation and to support the social and environmental initiatives set out by organisations such as the United Nations and the International Telecommunications Union.

Do you report publicly on your greenhouse gas emissions? What are the biggest challenges that you see when it comes to climate change?
Yes, our greenhouse gas emissions are reported in our integrated, sustainability, UN Global Reporting Initiative, UN Global Compact (www.mtn.com) and CDP reports (https://www.cdp.net/en), which are published on our website. Our biggest challenge is to reduce our climate impact in the context of a rapidly growing business and network, in regions where access to reliable and affordable energy remains a challenge.