



Digital Human Rights

MTN's position on Digital Human Rights

More people than ever before across the world have access to information, services and opportunities, with instant connections that transcend locations and borders. This has created significant innovations and opportunities for people to enhance their lives and enjoy greater access to rights than ever before.

MTN's networks, products and services are supplied with the intention of facilitating digital communications and brightening the lives of the societies in which the company operates.

Our response to digital human rights is underpinned by a sound policy and due diligence framework. Our approach is consistent with internationally recognised principles while ensuring that MTN remains compliant with the terms of our various jurisdictional legal obligations and licence conditions.

We believe in respecting and protecting the rights of all people to communicate, to share information freely and responsibly, and to enjoy privacy and security regarding their data and their use of digital communications.

MTN is guided by the following globally-defined standards:

- The United Nations Universal Declaration on Human Rights
- The United Nations "Protect, Respect and Remedy" Framework and Guiding Principles
- African Union Convention on Cyber Security and Personal Data Protection
- ECOWAS Supplementary Act A/SA.1/01/10 on Personal Data Protection (2010)
- SADC Model Law on Data Protection (2012)

MTN is a member of these key bodies:

- Signatory of the United Nations Global Compact
- Member of GSMA (Global System for Mobile Communications):
 - Sustainability Network includes Human Rights
 - Data Protection and Privacy Working Group
- Center for Internet Security
- Information Security Forum
- GSM Association

Our commitment to digital human rights is an integral part of our business strategy and sustainability framework and is embedded in the highest levels of our governance structures.

Any comments or concerns can be logged through our in-country customer help lines and via email to HumanRights@mtn.com.



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Key principles of MTN's policy on Digital Human Rights

- MTN respects the rights of all persons and opposes any actions that undermine people's human rights and that discriminate against people or may be contrary to our values and beliefs.
- We respect people's rights irrespective of race, ethnicity, colour, age, language, religion, gender, sexual orientation, political or other affiliation, ability, jurisdictional or international status.
- 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 respect and endeavour to comply with the laws of the countries in which we operate.
- We strive to create platforms to enable stakeholders to discuss their concerns with us and to escalate their concerns where they believe their rights have been infringed.
- We value the trust that our customers place in us when they provide personal information. We endeavour to stipulate the data we capture, retain, process, use and provide to key stakeholders.
- We work to limit the scope, extent or duration of human rights impacts, in instances where we do not have direct control, by engaging with third parties, internet service providers, regulators or other stakeholders who may have control of and/or access to our facilities, infrastructure or services.
- We may restrict access to services, where MTN owns, operates or has technical control over online platforms, in instances where potential exists to harm the rights of people. Restrictions would be applied after assessing if the content is illegal or harmful as defined in terms of prevailing national laws or the UN Universal Declaration on Human Rights.
- MTN seeks solutions to reduce digital human rights risks and adverse impacts through stakeholder collaboration and engagement.

- Our Digital Human Rights policy applies to all our directors, officers, employees and representatives of the Company whether permanent, temporary or on contract.
- We expect our intermediaries, agents, contractors, suppliers and business partners to uphold the same standards. Our Supplier Code of Conduct outlines the minimum standards including Human Rights that each supplier of products or services must comply with ([Link to Supplier Code of Conduct on the website](#)).
- Detailed training is provided to staff & partners based on the extent of their roles and ability to impact and/or influence these rights.

Digital Human Rights

MTN's Digital Human Rights Due Diligence Framework

MTN's due diligence framework has been drawn from the UN Guiding Principles for Business and Human Rights framework ("Protect, Respect and Remedy").

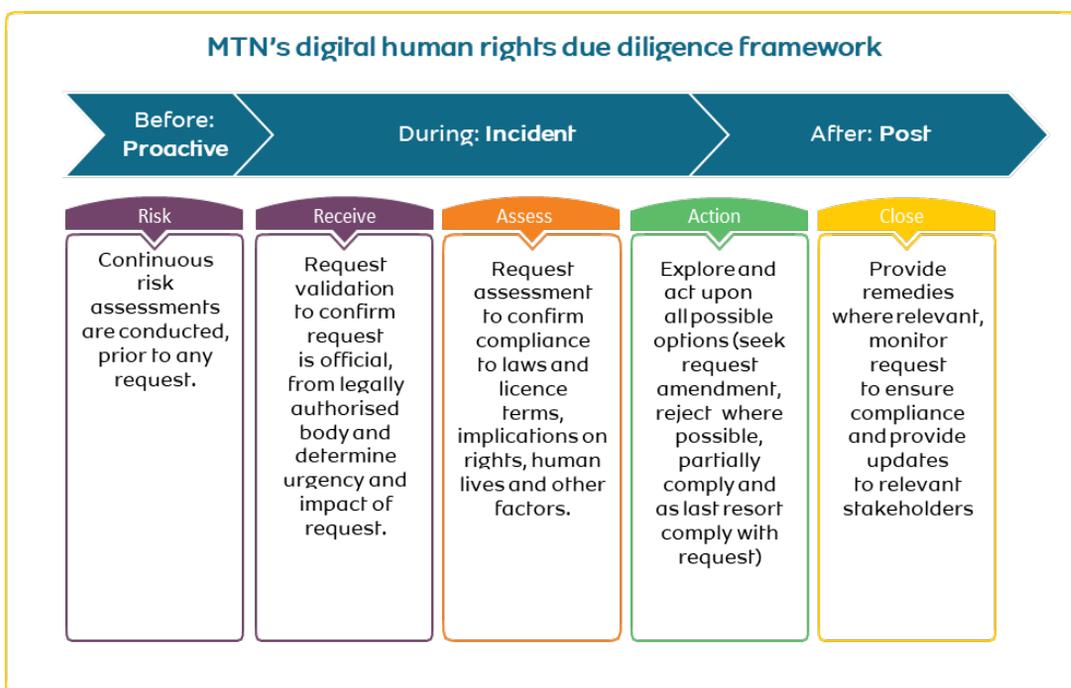
The framework, supported by a toolkit, outlines the steps that all MTN operations would follow before, during and after the occurrence of a digital human rights incident.

Incidents would come in the form of a request or instance where an authority or non-governmental entity approaches MTN on a matter related to freedom of expression, data privacy and information security.

This framework includes assessing potential incidents and potential impacts of the incidents that may affect customers' rights and enabling our teams to respond to incidents through a clearly defined process which includes identifying remedies for affected customers.

The same process is followed irrespective of whether it is a non-judicial government demand or court order from local or foreign government jurisdictions.

MTN will attempt to avoid negative human rights impacts by exploring every possible alternative, including pushing back, where it identifies a risk of these rights being infringed.



MTN's due diligence approach is iterative and ongoing due to the complex and rapid evolution of technology and regulation, taking into account the macro, social and political climate.

Digital human rights

Frequently Asked Questions on Digital Human Rights

MTN strives to conduct business in a way that is respectful of the rights of all people. MTN believes in the rights of all people to communicate, access and share information freely and responsibly, and to enjoy privacy and security regarding their data and their use of digital communications.

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 (CEO) (see our sustainability governance structure below). Regional Vice Presidents and Country CEOs play a key role at a regional and country level.



Does MTN undertake digital human rights risk & impact assessments for new investments or acquisitions?

MTN strives to undertake digital human rights risk and impact assessments for all strategic and/or high-risk acquisitions, investments and partnerships at planning or contract renewal stages.



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 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?

Risk and impact assessments are a key element of MTN's due diligence framework. Due to the evolving nature of risks in digital communication, we work to update our digital human rights risk identification and mitigation plans on a quarterly basis. We conduct impact assessments on an annual to bi-annual cycle utilising internal and third parties as required.



Does MTN offer remedies to customers affected by incidents such as freedom of expression restriction?

MTN offers remedies including data refunds or free data/airtime to impacted customers impacted on a case-by-case basis.



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. MTN will strive to publish Transparency Reports annually to enhance stakeholder understanding of MTN's operating environment, risks and management of digital human rights. Reports would be published to the extent allowed by the laws of each of the countries in which MTN operates.

Our sustainability governance and reporting structure

