



# Anti-bribery, Corruption and Gifts

## MTN Group's position on Anti-bribery, Corruption and Gifts

Fraudulent and corrupt activities are a threat to the sustainability and reputation of any business. MTN has a zero-tolerance approach to fraud, bribery and corruption, and we are constantly striving to improve our fight against it. It is our policy to conduct all our business activities with honesty, integrity and to the highest ethical standards, and we recently updated the MTN Group anti-bribery and corruption policy to ensure that our efforts against fraud, bribery and corruption are in alignment with the overall Group ethics framework.

We consider facilitation payments as bribes, and therefore illegal. We will only do business with parties that do not make facilitation payments. Our gifts policy includes a declaration of gifts in a gift register, and all employees are expected to record gifts, hospitality and corporate expenses. Procurement policies and procedures are communicated to employees and suppliers to ensure selected providers of services are aware of our requirement to act in a legal, ethical and professional manner. We work to ensure that third party engagements are for bona fide purposes, that adequate due diligence is conducted, and that compensation is appropriate and justifiable remuneration for legitimate services rendered.

In our dealings with public officials and government employees, we work to ensure that we act in an ethical manner. We also recognise that strong democracies require healthy political parties, and that these parties require resources to represent people, operate structures, contest elections and meaningfully contribute to political debates; therefore our political donations policy sets out our political support during general elections in countries. Political party financial support is only provided should a country hold national elections, and funding is allocated to each party in relation to its performance in general elections. We act in an entirely open manner and will publicly disclose political donations made.

As part of our corporate citizenship role, charitable donations and sponsorships are encouraged, but we will not undertake this with the intention of placing actual or potential customers, suppliers or public officials under any obligations.

For MTN, it is important that our employees in particular are aware of what constitutes fraudulent or corrupt behaviour, and what they need to do once they are aware of potentially fraudulent activities.

- MTN ensures that all employees, suppliers and partners are made aware of our Anti-bribery policies and procedures through our various internal communication channels.
- Our policies are made available in universally accepted languages and translated to local languages within our markets.
- Training is provided to staff, suppliers, and partners on our Anti-bribery policy.