



MTN position statement

Fraud

Introduction

MTN is committed to high ethical, moral and legal standards that include accountability, transparency, fairness, responsibility and integrity. The mechanisms available to create these standards are intended to address fraud and other acts of wrongdoing perpetrated by any employee or trading partner against MTN.

MTN clearly states its expectations and requirements relating to the prohibition, recognition, reporting and investigation of suspected fraud, corruption, misappropriation and other similar irregularities. We avoid the negative effect of fraud in relation to revenue and profits, retention of customers, MTN's reputation and operational efficiency of the business, and we create a fraud-free culture and environment within MTN by eradicating fraud and attempted fraud.

Key principles

- MTN does not tolerate maladministration, corruption, fraud, theft, cybercrime, money laundering, financing of terrorism, or any other dishonest activities of a similar nature.
- These include but are not limited to any dishonest, fraudulent or corrupt act; theft of funds, supplies, or other assets; maladministration or financial misconduct in handling or reporting of money, financial transactions or other assets; making a profit from insider knowledge; disclosing confidential or proprietary information to outside parties; irregularly accepting, requesting, offering or giving anything of material value to or from contractors, suppliers or other persons providing services/goods to the department; irregular destruction, removal or abuse of records, furniture and equipment; blackmail or extortion; money laundering and terrorist financing; criminal activities carried out by means of computers or the internet specifically targeted at MTN (cybercrime); any similar or related irregularity; and deliberately omitting or refusing to report or act upon reports of any such irregular or dishonest conduct.
- Employees are required to raise their concerns and report wrongdoing within the workplace. The whistleblowing facility is operated independently by an outsourced service provider and is governed by the MTN Group Whistleblowing Policy.
- We expect of each employee to, in all reasonable circumstances, assist and cooperate in all investigative and other activities aimed to prevent, detect and eradicate fraud.
- We further view it as the responsibility of all employees to carry out their work in such a way as to prevent fraud occurring in the workplace. Employees must also be alert for occurrences of fraud, be aware that unusual transactions or behaviors could be indications of fraud, and report potential cases of fraud.

Roles and responsibilities

MTN's Board through the Audit Committee has oversight of the Group's actions and performance regarding fraud. The Group Executive Committee ensures the Group



complies with the policy and implements its principles within their jurisdictions, operations or business units.

Applicability

All MTN employees, contractors and stakeholders such as our affiliates, partners, consultants and service providers are expected to uphold the same standards set out in the policy.

Accountability and transparent reporting

We are committed to transparency and disclosure regarding fraud at MTN. Fraud-related concerns are reported by operating companies to Group Internal Audit and Forensics. MTN's Annual Sustainability Report outlines the process of MTN's internal management on all whistleblowing reports received, including the outcomes of the internal disciplinary process.

Communication and training

The Group Fraud policy is shared with all employees of MTN's operating companies, subsidiaries and partners. The Policy is translated into local languages as required. Detailed training is undertaken for various functional, business and operating market areas and levels of management.