



MTN Group Limited

Transparency Report for the year ended 31 December 2020

Leading digital solutions for Africa's progress



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MTN believes that everyone deserves the benefits of a modern connected life.

Progressing the United Nations Sustainable Development Goals (UN SDGs)

We view sustainability as an integral part of MTN's value-creation journey.

The UN SDGs on which we have the greatest impact are highlighted below:

Online information

Additional reports and more information about MTN and its sustainability are available on our website.



Our online reports:

CDP Carbon Disclosure Project	IR Integrated Report	KIV King IV™
SE Social and Ethics Report	TAX Tax Report	UN UN Global Compact

Other icons:

- www.mtn.com
- Limited assurance obtained
- Five-year review
- COVID-19

Our material stakeholders:

- MTN people
- Subscribers/customers
- Investment community
- Civil society
- Governments and regulators



Who we are

MTN is an emerging market mobile operator at the forefront of technological and digital changes. Inspired by our belief that everyone deserves the benefits of a modern connected life, we provide a diverse range of voice, data, digital, fintech, wholesale and enterprise services to more than 280m customers in 21 markets.

We were established in South Africa at the dawn of democracy, in 1994, as a leader in transformation. Since then, we have grown by investing in sophisticated communication infrastructure, developing new technologies and harnessing the talents of our diverse team of people to now offer services to communities across Africa and the Middle East.

Our revised strategy, Ambition 2025, is anchored in building the largest and most valuable platform business with a clear focus on Africa. This will rest on a scale connectivity and infrastructure business using both mobile and fixed access networks across the consumer, enterprise and wholesale segments. Implementing this growth strategy will be accelerated through selective partnerships and leveraging MTN's brand as the most trusted and valued in Africa, while it will be supported and funded through enhanced cost and capital expenditure efficiencies. The execution of Ambition 2025 is embodied in four clear strategic priorities, and we have identified five vital enablers to assist in operationalising our strategy.

Belief statement

"Everyone deserves the benefits of a modern connected life"

Strategic intent

Ambition 2025 "Leading digital solutions for Africa's progress"

**20
25**

Strategic priorities



Build the **largest** and most valuable platforms



Drive **industry-leading** connectivity operations



Create **shared value**



Accelerate portfolio **transformation**

Vital enablers



Leading customer experience



Best talent, culture and future skills



Value-based capital allocation



ESG at the core



Technology platforms second to none

Values

Leadership

Innovation

Relationships

Integrity

Can do

Our sustainability approach

Sustainability is at the core of our business strategy as we strive to create shared value for our stakeholders. We realise the importance of driving economic value sharing through responsible environmental, social and governance practices as outlined within our sustainability framework.

Eco-responsibility

One of the most significant ways business is shaping the world we live in is through energy use and its contribution to climate change. Scientists and policymakers largely agree that Africa's population is more vulnerable to the effects of climate change than many other regions globally.

We believe the growth and success of any business should not come at the expense of the future of our planet. As a result, we take responsibility for our environmental impacts and manage the aspects within our control throughout our geographic footprint in Africa and the Middle East.

Sustainable societies

Building a digital platform to drive digital transformation across Africa and the Middle East is pivotal to serving societies' interests. The digital revolution is a powerful agent for transforming society for the better; conversely, a lack of access to the digital world creates wider social and economic disparities.

As an emerging market operator, addressing social challenges is an inherent part of our business. MTN can flourish only when the communities and ecosystems in which it operates are healthy.

Leveraging the size, resources and capabilities of our business, we enable socio-economic development in the communities within which we operate. This is underpinned by our core belief that everyone deserves the benefits of a modern, connected life.

Sound governance

A strong governance framework fosters sustainability, establishes sustainable values and embeds a value-driven organisational culture. Good governance promotes accountability and transparency, underpinning efficient management of human, natural, economic and financial resources. Sound governance includes ethical conduct, robust risk management and regulatory compliance, which is fundamental in our shared-values approach and in ensuring our long-term sustainability.

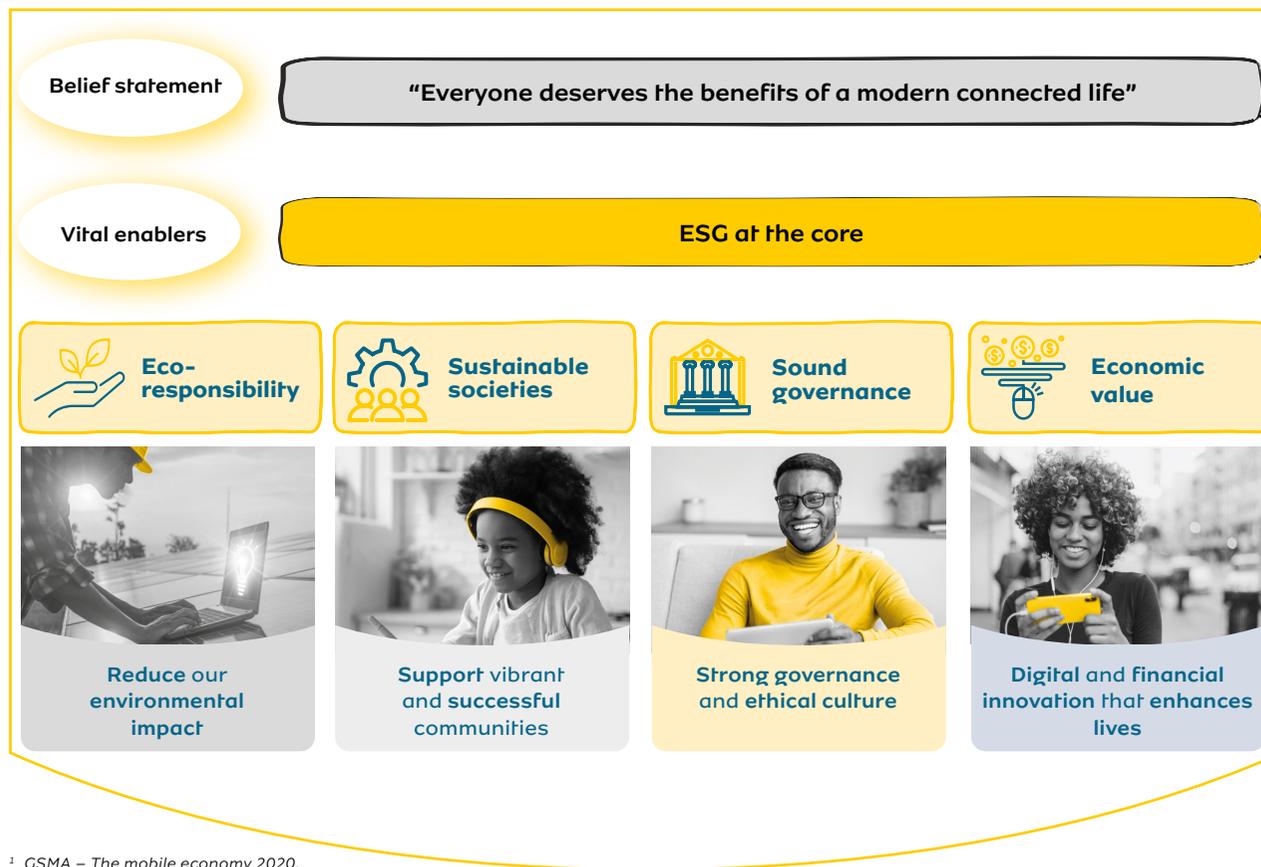
Our governance practices assist us in preventing and mitigating risks in our operating environments, as well as building trust with our stakeholders.

Economic value

Mobile technologies and services contributed as much as 4,7% to gross domestic product (GDP) globally in 2019. This significant figure is estimated to increase to 4,9% of GDP by 2024, as countries continue to benefit from the related improvements in productivity and efficiency¹.

MTN's success is closely linked to inclusive socio-economic growth and development in Africa. We provide the foundation for a modern connected life through our extensive and resilient networks and a wide range of products and services tailored to emerging market needs. As one of Africa's largest digital operators, MTN plays a pivotal role in addressing considerable gaps in access to connectivity by driving mobile and internet adoption.

Our sustainability framework



¹ GSMA – The mobile economy 2020.



Overview

We believe **everyone deserves** the benefits of a **modern connected life**. We are accelerating digital and financial inclusion by connecting the unconnected and ensuring that people **reap** the social, economic and developmental **dividends** of being online.

Technology transforms economies and societies and supports the UN SDGs. It also provides more significant opportunities for people to enjoy their rights.

MTN works to create and protect shared value for MTN and our stakeholders through responsible economic, environmental, social and governance practices.

MTN is committed to respecting human rights and endeavours to protect the rights of all people using our services in the respective jurisdictions in which we operate in accordance with globally defined standards, while remaining compliant with the terms of its various jurisdictional legal obligations and licence conditions.

MTN endorses the position of the UN that the rights held by people offline must also be protected online. To increase the disclosure of our impact on society, human rights and the environments in which we operate, we publish a suite of complementary reports.

This first edition of MTN's Transparency Report seeks to provide an understanding of our operating environment, risks and approach to digital human rights across our footprint.



South Africa

Nigeria

SEAGHA

WECA

MENA
(including Iran)

Our approach to digital human rights



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.



Our operating context

As an emerging market operator, the environment in which we work is complex, presenting unique challenges as well as exciting and valuable opportunities.

Many of the markets in which MTN operates have the lowest mobile penetration rates globally. The countries in which we operate have fast-growing, youthful populations.

Governments in all our markets recognise the importance of connectivity to promote investment and drive economic growth. Investing in these markets allows MTN to provide vital communications services, ensuring people have access to basic and emergency services and a means of sharing information and staying connected.

MTN's presence enables people to realise their basic human rights. Notwithstanding, the risk of human rights incidents in our countries of operations exists. Such risks are a factor of doing business in these markets and are not strictly limited to MTN.

In some of our markets we rely on third-party internet service providers for international connectivity. When internet services are restricted or shut down, we may be limited in managing the impacts on our customers.

The rights of various stakeholder groups are balanced against each other as the Company strives to avoid or minimise any negative human rights impact and contribute positively to the advancement of the societies in which we operate.

To ensure that we remain agile, we are continuously innovating the way we conduct our business. Our digital human rights approach is ever evolving to remain abreast of the complex and rapid evolution of technology and regulation, as well as the macro-social and political climate.



South Africa[^]

#2 operator

Population	58,8m
Subscribers	32,0m
Data subscribers	15,7m
Employees	6 058*

Service revenue	R37,0bn
Data revenue	R14,6bn
EBITDA margin	39,0%
Capex	R7,5bn

Nigeria

#1 operator

Population	204,7m
Subscribers	76,5m
Data subscribers	32,6m
Employees	2 715

Service revenue	R57,7bn
Data revenue	R14,4bn
EBITDA margin	50,9%
Capex	R12,7bn

SEAGHA

Population	117,9m
Subscribers	57,3m
Data subscribers	20,6m
Employees	3 229

Service revenue	R33,7bn
Data revenue	R8,4bn
EBITDA margin	49,4%
Capex	R6,1bn

WECA

Population	91,8m
Subscribers	39,2m
Data subscribers	13,6m
Employees	2 365

Service revenue	R27,4bn
Data revenue	R6,6bn
EBITDA margin	31,2%
Capex	R3,4bn

MENA

Population	212,5m
Subscribers	74,6m
Data subscribers	31,9m
Employees	4 928

Service revenue	R10,4bn
Data revenue	R3,5bn
EBITDA margin	32,2%
Capex	R1,6bn

*Includes MTN IranCell

[^] South Africa numbers include MTNSA, MTN head office and business solutions

Our Human Rights Policy

More people than ever before worldwide 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.

MTN's networks, products and services are supplied to facilitate digital communications and brighten 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.

MTN is guided by the following globally defined standards:

- The 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.
- Economic Community of West African States 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:
 - Sustainability Network includes human rights.
 - Data Protection and Privacy Working Group.
- Center for Internet Security.
- Information Security Forum.

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.

We provide detailed training to staff and partners based on the extent of their roles and ability to impact and/or influence these rights.

Key principles of MTN's Digital Human Rights Policy



MTN respects the rights of all persons and opposes any actions that undermine people's human rights and that discriminates 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 of Human Rights.



MTN seeks solutions to reduce digital human rights risks and adverse impacts through stakeholder collaboration and engagement.



Our Human Rights Policy continued



Key complementary policy developments

We are deeply committed to respecting digital human rights. Our freedom of expression, data privacy and protection, information security, and treating customers fairly rights (TCF) and principles are an integral part of our Digital Human Rights Policy and due diligence framework.

Across various human rights issues, we ensure that we remain abreast of new developments, review lessons learnt and continue to update our processes and policies to align with international standards.

Our revised Digital Human Rights Policy, reviewed in 2020 and approved in 2020, places greater emphasis on proactive risk detection and mitigation.

Scanned over 3,5 billion URLs suspected of hosting Child Sexual Abuse Material (CSAM) and locked 623 million abusive URLs in 2020.

This is complemented by the following policies:

Managing customers' privacy rights

- The Data Privacy and Protection Policy, approved in 2020, informs customers of their rights and sets MTN's standard to protect personal information of customers and frames the Group's collection, use and protection of user's information. The policy considers data privacy/data protection developments and regulations in MTN's markets and globally.

Enhancing information security

- The Group Information Security Policy was last updated in 2020. The policy sets out requirements for securing the Group's information, systems and people, using a formal information security management system. The system is based on leading global practice including ISO/IEC 27001:2013, Center for Internet Security controls and the National Institute of Standards cybersecurity framework.

Empowering customers through fair treatment

- MTN implemented a group-wide framework on TCF to facilitate transparency and customer control. The framework serves to enable customers to remain aware of the costs they incur, the services they use and how to control and remove access to these services.

Protecting children online

- MTN is committed to ensuring the safety of children online. In 2020, we deepened our commitment by launching the child online protection programme, prioritising our focus on child sexual abuse material. We formalised our commitment by becoming members of the Internet Watch Foundation. We have thereby extended our ability to fight against the use of our networks to share CSAM.



Our 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").

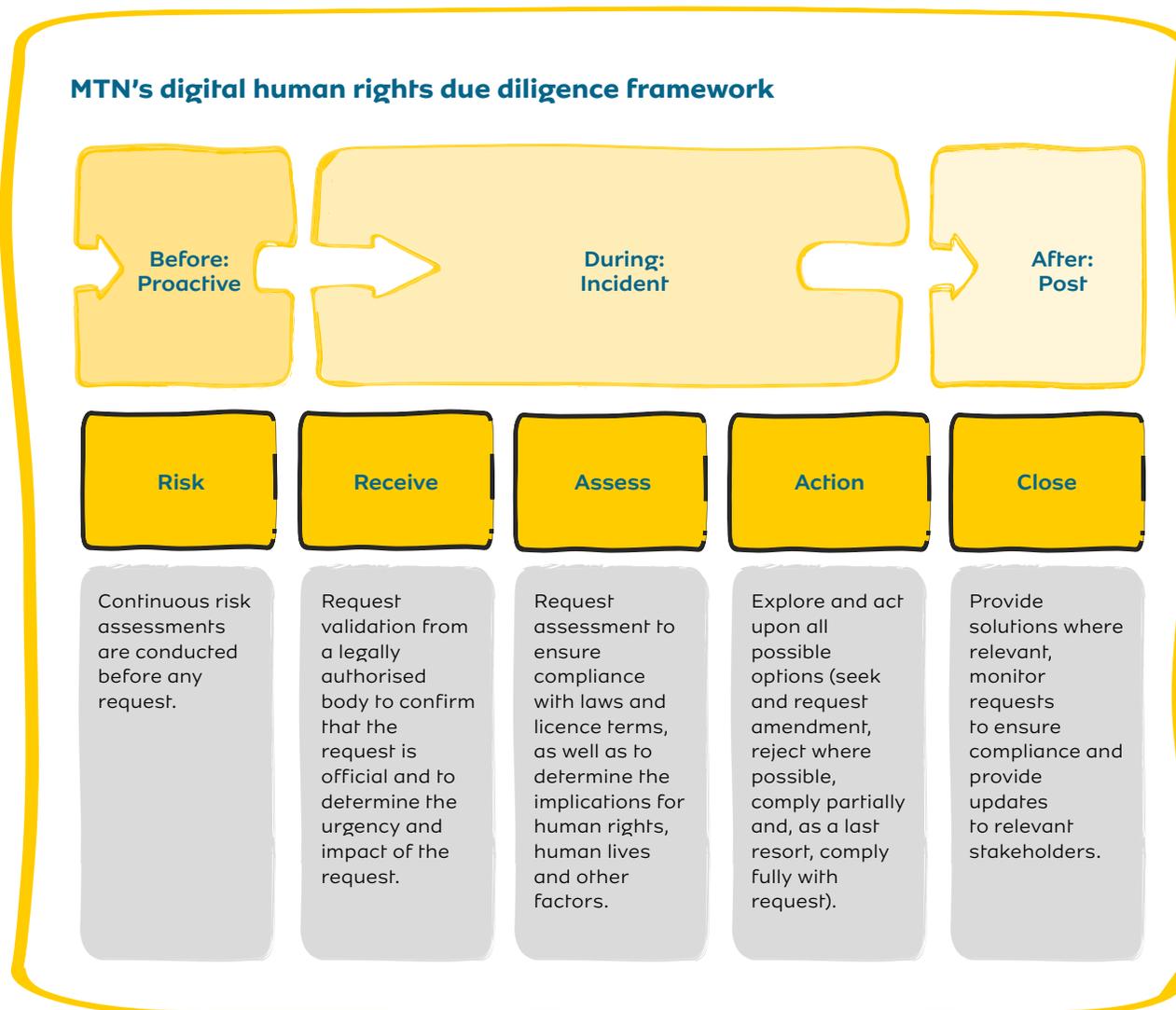
The framework, supported by a toolkit, outlines the steps that all MTN operations would follow before, during and after the occurrence of a digital human rights incident.

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 where it identifies a risk of these rights being infringed.



Our due diligence framework continued

1. Before: Proactive management

- **Conducting risk and impact assessments:** Digital human rights risk and mitigation plans are reviewed on a quarterly basis. Impact assessments are done on an annual to bi-annual basis.
- **Engaging stakeholders:** Engage with regulatory authorities, industry players and other stakeholders to discuss legislation, licence requirements and solutions in relation to human rights risks, issues and opportunities.

2. During: Incident management

- **Managing requests or incidents:** In determining MTN's response to requests received from authorities and non-governmental entities, the following key steps are undertaken:
 - All requests that may limit freedom of expression, access to information or privacy, or harm the information security of MTN's customers are evaluated following a due diligence approach to determine if the authorities and non-governmental entities are legally authorised to make the request and have followed the prevailing legal processes.
 - MTN engages with relevant stakeholders for guidance before responding to requests to clarify the request, seek an amendment to the request, or seek that the request is set aside where possible.
 - Review request in accordance with the laws and applicable regulatory requirements of the countries in which we operate. Where multi-jurisdictions are concerned, the various applicable laws, including international laws, will also be assessed.
 - MTN assesses whether engaging with authorities to reject the request (or partially comply with it) will increase the risk to the safety of employees or compromise MTN's ability to continue operations.
 - Following the due diligence and evaluation in terms of good governance, legal and risk management processes, we would respond in any of the following ways:
 - Reject the request where possible.
 - Partially comply with the request.
 - Fully comply with the request.

- **Mitigating the impact of disruptions:** MTN ensures that it communicates with impacted parties based on applicable law. We work to safeguard employees, customers and partners for whom we are responsible and ensure that the integrity of our infrastructure is maintained.
- **Situational stakeholder engagement:** MTN engages with various stakeholders to ensure their perspectives are obtained; to identify potential mitigations, and; to manage the situation as effectively as possible. Grievances can be logged through our in-country customer complaints lines and via e-mail to HumanRights@mtn.com.

3. After: Post-incident management

- **Record-keeping:** To facilitate corporate learning and to obtain information required for stakeholder engagement and reporting, MTN strives to maintain a documented trail of evidence relating to relevant events, decisions and actions.
- **Remedies for affected customers and stakeholders:** MTN works to offer remedies to customers negatively impacted on a case-by-case basis.



Our due diligence framework continued

The legal basis under which we comply

MTN respects and endeavours to comply with the laws of the countries in which we operate. We conduct our business in accordance with applicable legislative, regulatory and licence requirements, with the intention of:

- Protecting the rights of our customers to access information and express themselves online.
- Protecting personal information.
- Providing safe communication services in the respective jurisdictions in which we carry out our operations.

MTN is committed to fair dealing when conducting its business and strives to always act with due skill, care and diligence. We have a low-risk appetite towards non-compliance with respect to legislative and regulatory requirements.

We strive to conduct our business by following the letter and spirit of the applicable regulatory and legislative requirements in the markets in which we operate.

All requests are reviewed in accordance with the legislative, regulatory, licence conditions rules, guidelines, ministerial/national security orders or directives, including directives relating to public safety (where applicable) and other related requirements with which MTN is required to comply.

The lawful initial reason provided or the requirement for which requests related to digital human rights is made, or as otherwise prescribed by regulatory requirements, is carefully considered.

MTN will fulfil its responsibilities to relevant regulatory authorities, where applicable, with a view to conduct business in an ethical, open and transparent manner.

Where laws and/or licence conditions are not definitive or are in clear conflict with any international norms, we may seek further legal guidance. We will evaluate all possible risks associated with complying with or rejecting requests.

Reasons why MTN would comply:

- Support application of the law by any public body.
- Comply with a regulatory requirement.
- Support the conducting of any legal proceedings.
- Lawful purposes related to licence obligations.



Case study



“MTN proved that it was ethical and respectful to customers. It was the first operator to restore the service and the last to disconnect: #longliveprofessionalethics.”
– MTN Sudan customer

MTN Sudan navigates internet shutdown constructively

As a telecommunications operator, we sometimes have a challenging role to play to ensure that we continue operating despite delicate situations. Given the number of people who rely on us, it is critical that we continue to operate.

We always strive to protect, respect and uphold the rights of our customers. It is not always possible to act in opposition to the law or the terms of our licence in the markets where we operate.

In June 2020, Sudan experienced a month-long near-total internet shutdown due to the unrest which took place in the country.

MTN followed its robust risk-based process which included understanding the options available before making any decision to comply or reject the requests. The process also considered the safety and security risks to employees, customers and operations.

All operators in Sudan were affected by social media restrictions during this time. MTN Sudan was commended by its customers for being one of the last operators to shut down and one of the first to reinstate services.

This was testament to MTN Sudan's tireless efforts to minimise the impact to customers and to the robust engagements it held with key stakeholders, ensuring services were back online in the shortest time possible.

Our markets



Our markets

Our **geographic footprint** is wide, stretching over **21 markets** on two continents. As an **emerging-market operator**, the environment in which we work is complex, presenting **unique challenges** as well as **exciting opportunities**.



Scope of the reports

Compilation of this report

- This report covers MTN's digital human rights activities for the period commencing 1 January 2020 and ending 31 December 2020.
- The report aims to provide a summary of the legal regime concerning the rights to freedom of expression, data protection as well as information security (collectively, "digital human rights") in the countries in which we operate.
- **Scope and boundaries:**
 - Included: Benin, Cameroon, Congo-Brazzaville, eSwatini, Ghana, Guinea-Bissau, Guinea-Conakry, Iran, Côte d'Ivoire, Liberia, Nigeria, Rwanda, South Africa, South Sudan, Sudan, Uganda and Zambia (collectively, the "markets").
 - Excluded: Afghanistan, Syria, Mascom Botswana, Iran and Yemen have been excluded due to insufficient information and in-country reporting limitations.
- **Sustainability and digital human rights reporting standards and guidelines:** Our disclosures are primarily guided by the Global Reporting Initiative (GRI) Sustainability Reporting Standards, the United Nations Global Compact (as a signatory member), UN Guiding Principles on Business and Human Rights, Ranking Digital Rights, GSMA Human Rights Guidance for the Mobile Industry.

Data collection process

- This report was compiled using information collected by MTN Group from each of the markets, with the assistance of a third party to safeguard the integrity of the information.
- The markets relied on their internal records and certain public documents to compile their responses, with the numerical values are largely based on 2019 data. In preparing this report, the MTN markets provided information concerning:
 - The laws applicable to their market and how these laws protect the digital human rights of the market's subscribers.
 - The regulators, authorities, courts and/or state bodies in each territory that exercise jurisdiction over the market (each an "authority").
 - The requests received by the markets from the authorities and the manner in which the markets have responded to these requests (in particular, whether the markets have complied with, partially complied with or denied requests).
 - The requests received by the markets from private individuals, private companies or attorneys or third parties authorised on their behalf (each a "non-government entity") and how the markets have responded to these requests.
- Due to legal restrictions in some countries in which we have a presence, certain markets are prevented from publicly disclosing certain information. Where this is the case, we have omitted this information from the report given the rule of law.
- In addition, there are instances where we do not detail the number of requests received from non-governmental entities. This has been intentionally omitted for reasons including:
 - The relevant market has not received requests from non-governmental entities.
 - In certain jurisdictions, we are not legally permitted to disclose information from non-governmental entities.
- In certain markets due to legal restrictions, MTN is not permitted to notify affected customers when requests are received from authorities or non-governmental entities.
- Additionally, MTN may also not be permitted to notify users when it shuts down network/internet or restricts access to a service.
- As a rule, the markets do not share subscriber data with non-governmental entities unless requested to do so by the subscriber or where a market is required to do so pursuant to an order from an authority or other legal obligation.
- The legal framework and authorities referred to in each market is accurate as at 28 February 2021.



Scope of the reports continued

Categories of requests from authorities

- The markets have detailed the requests received from (i) the authorities and (ii) non-governmental entities. Given the broad range of laws and requirements applicable to the markets, we have categorised the types of requests received from authorities as follows:
 - **Data requests pursuant to criminal investigations:** Requests by authorities submitted pursuant to the terms of applicable laws or by virtue of a court order for information of subscribers in the context of criminal investigations, such as subscriber identification, call and SMS information, billing statement and historical location data. These requests do not include requests by authorities for the content of the underlying communications.
 - **Data requests for location disclosure:** Requests by authorities that are legally permitted by applicable laws or by virtue of a court order for the current location of a subscriber.
 - **Data requests for lawful interception:** Requests by authorities that are legally permitted by applicable laws or by virtue of a court order for the lawful interception of a subscriber's communication.
 - **Data requests pursuant to governmental or regulatory oversight:** Requests by authorities for information required by the authorities to perform their designated governmental or regulatory functions, including their oversight of telecommunication service providers.
 - **Data requests pursuant to suspension of MSISDNs, subscriber identification module (SIM) cards, service restriction orders and internet shutdown:** Requests by authorities that are legally permitted by applicable laws or by virtue of a court order obliging mobile network operators to block a service, suspend/deactivate SIM cards or Mobile Subscriber Integrated Services Digital Network numbers (MSISDNs) of subscribers.



Market data overview

Categories of requests from non-governmental entities

- We have categorised the types of requests received from non-governmental entities as follows:
 - Data requests pursuant to civil litigation: These requests generally consist of requests made by non-governmental entities engaged in civil litigation with, or on behalf of subscribers, and subscriber requests for their own data.
 - Data requests for personal and private use: Subscribers may request access to their own data for several reasons, including to comply with a requirement from an embassy or a visa requirement.
 - There may be, to some extent, an overlap between the abovementioned categories of requests as certain requests received by a market may be broader than others.

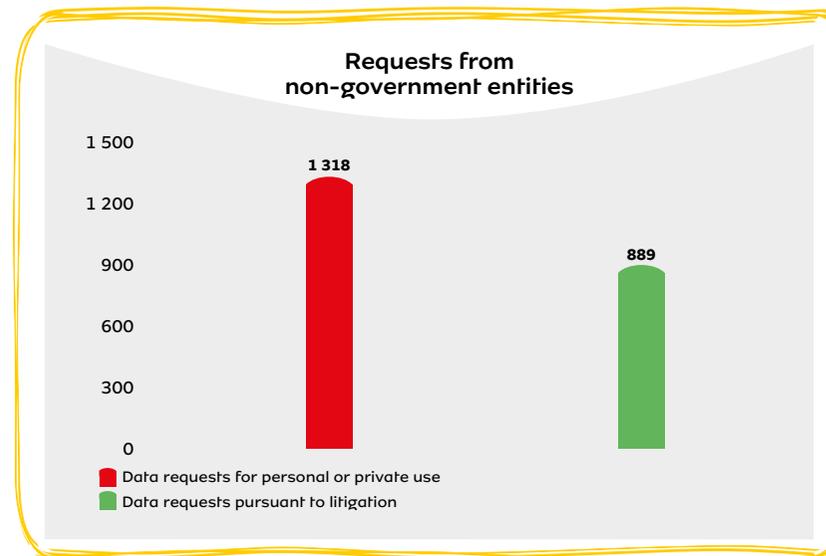
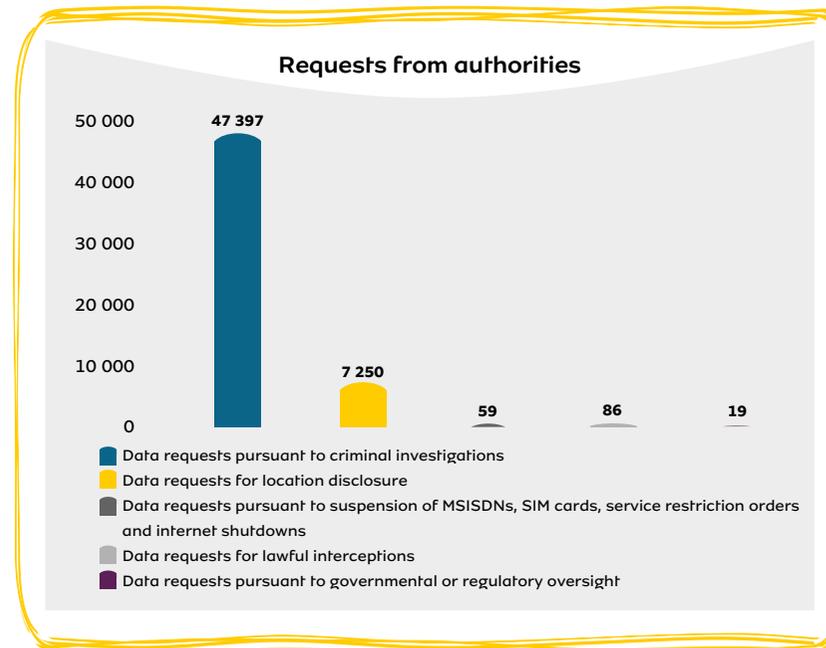
Overview of major digital human rights developments

The key highlights of MTN's digital human rights requests from authorities across our markets include:

- All of the requests from authorities are driven by legal and regulatory obligations of MTN.
- 99% of the requests aid with criminal investigations and court orders pertaining to location disclosure.
- 0.1% pertain to data requests pursuant to suspension of MSISDNs, SIM cards and service restriction orders.

The key highlights of MTN's digital human rights requests from non-governmental entities across our markets include:

- The majority of these requests come from civil litigation-related cases.
- 60% of requests are in support of civil litigation cases.
- 40% are based on subscriber requests for personal or private use.



Introduction

MTN has been present in Benin since 2006. MTN has approximately **5,8m** customers in Benin. In 2020, MTN's revenue in Benin was **R5,9bn**.

Lawful interceptions

• Legal framework

- Article 12, 437, 438, 441 and 451 of the Digital Code (Law 2017-20 of 20 April 2017).
- The African Charter on Human and People's Rights.
- The Information and Communication Code (Law 2015-07 of 20 March 2015).
- The Criminal Code and Code of Criminal Procedure.
- Law No. 2015-08 of 8 December 2015 bearing the child code in the Republic of Benin.
- Law No. 2017-08 of 19 June 2017 identifying individuals in the Republic of Benin.
- Law No. 2016-36 of 23 January 2017 regulating credit information bureaus in the Republic of Benin.
- Law No. 2017-44 of 5 February 2018 relating to the collection of intelligence in the Republic of Benin.
- Law No. 2018-17 of 25 July 2018 relating to the fight against money laundering and the financing of terrorism in the Republic of Benin, amended by Law No. 2020-25 of 2 September 2020.
- Law No. 2020-08 of 23 April 2020 on the modernisation of justice.
- Law No. 2020-34 of 10 December 2020 on the simplification and dematerialised management of civil status*.
- Decree No. 2006-752 of 31 December 2006 Establishing, attributions, organisation and functioning of the National Unit for the Processing of Financial Information.
- Instruction No. 002-01-2015 of 13 January 2015 relating to the procedures for obtaining the customer's consent by data providers to the Credit Information Offices within the framework of the credit information sharing system in the WAMU member states.
- Instruction No. 005-05-2015 of 8 May 2015 fixing the methods of transmission of information on Credit to Credit Information Offices.
- Instruction No. 007-05-2015 of 8 May 2015 relating to the methods of receiving and processing customer complaints by the Credit Information Offices.
- Instruction No. 009-06-2015 of 15 June 2015 relating to the security systems of the information systems of the Credit Information Offices.
- Decree No. 2016-465 of 3 August 2016 on the obligation to identify subscribers to electronic communications networks and services in the Republic of Benin.
- Decree No. 2018-206 of 6 June 2018 on the attributions, organisation and functioning of the National Agency for the Identification of Persons.
- Decree No. 2018-471 of 4 July 2018 Defining the modalities and operation of the administrative framework for carrying out registration by way of exception to the civil status and setting the rules relating to the dematerialisation of documents.
- Decree No. 2020-216 of 31 July 2020 setting the terms of granting licences, authorisations and conditions for making the declaration relating to the exercise of communications activities.
- Decree No. 2020-187 of 11 March 2020 authorising the collection and processing by the Republican Police of personal data of travellers at the borders of Benin*.
- Decree No. 2020-249 of 22 April 2020 on the conditions for identifying users of electronic communications services (repealing Decree No. 2016-465 of 3 August 2016 on the obligation to identify subscribers to electronic communications networks and services in the Republic of Benin)*.
- Decree No. 2020-281 of 13 May 2020 fixing the conditions for establishing and operating Internet of Things networks and services in the Republic of Benin*.
- Decree No. 2014-418 of 4 August 2014 establishing the National Unit for Analysis and Intelligence on Terrorism.
- Law No. 2015-08 of 8 December 2015 bearing the child code in the Republic of Benin.
- Law No. 2017-08 of 19 June 2017 identifying individuals in the Republic of Benin.
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- Decree No. 2006-752 of 31 December 2006 Establishing, attributions, organisation and functioning of the National Unit for the Processing of Financial Information.
- Instruction No. 002-01-2015 of 13 January 2015 relating to the procedures for obtaining the customer's consent by data providers to the Credit Information Offices within the framework of the credit information sharing system in the WAMU member states.
- Instruction No. 005-05-2015 of 8 May 2015 fixing the methods of transmission of information on Credit to Credit Information Offices.
- Instruction No. 007-05-2015 of 8 May 2015 relating to the methods of receiving and processing customer complaints by the Credit Information Offices.
- Instruction No. 009-06-2015 of 15 June 2015 relating to the security systems of the information systems of the Credit Information Offices.



MTN Benin continued

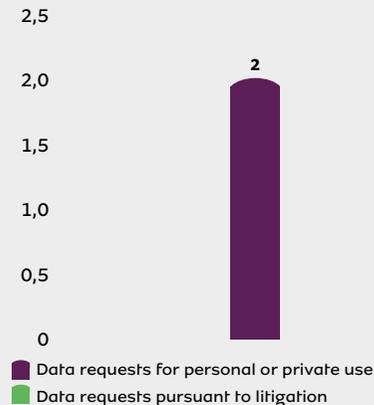
• Legal framework (continued)

- Decree No. 2016- 465 of 3 August 2016 on the obligation to identify subscribers to electronic communications networks and services in the Republic of Benin.
- Decree No. 2018-206 of 6 June 2018 on the attributions, organisation and functioning of the National Agency for the Identification of Persons.
- Decree No. 2018-471 of 4 July 2018 Defining the modalities and operation of the administrative framework for carrying out registration by way of exception to the civil status and setting the rules relating to the dematerialisation of documents.
- Decree No. 2020-216 of 31 July 2020 setting the terms of granting licences, authorisations and conditions for making the declaration relating to the exercise of communications activities.
- Decree No. 2020-187 of 11 March 2020 authorising the collection and processing by the Republican Police of personal data of travellers at the borders of Benin*.
- Decree No. 2020-249 of 22 April 2020 on the conditions for identifying users of electronic communications services (repealing Decree No. 2016-465 of 3 August 2016 on the obligation to identify subscribers to electronic communications networks and services in the Republic of Benin).
- Decree No. 2020-281 of 13 May 2020 fixing the conditions for establishing and operating Internet of Things networks and services in the Republic of Benin*.
- Decree No. 2014-418 of 4 August 2014 establishing the National Unit for Analysis and Intelligence on Terrorism.

• Authorities

- The Ministry of Justice.
- The Constitutional Court.
- The Courts and Tribunals of the country.
- The Digital and Communication Ministries.
- The Ministry of the Interior.
- The Economic Crimes and Terrorism Court.
- The Authority of Post and Electronics Communication.
- The Regulatory Authority.
- The Personal Data Protection Authority.
- The National Agency for The Security of Information Systems.
- The National Financial Information Processing Units.
- The Republican Police: General Directorate of the Republican Police.
- The National Personal Identification Agency.
- The Ministry of Economy and Finance.
- The Ministry in Charge of The Interior and Public Security and Cultures.
- The Ministry in Charge of National Defence.

Requests from authorities and non-government entities



Note: An instance of internet suspension impacted MTN customers in Benin in 2020. This was not due to a direct request to MTN Benin but rather a third-party internet service provider that MTN Benin relies on for connectivity.

- Number of notifications made to affected subscribers in relation to requests submitted by the authorities: one
- Authority requests fulfilled: one
- Authority requests declined: one

Service interruptions

In instances where MTN Benin's subscribers experience service interruptions or restrictions pursuant to the terms of a request from an authority or a non-governmental entity, MTN Benin may take measures to provide solutions or compensate subscribers for these interruptions, such as allocation of internet packages and providing airtime refunds to the subscribers.

Introduction

MTN has been present in Cameroon since 2000. MTN has approximately **10,3m** subscribers in Cameroon. In 2020, MTN's revenue in Cameroon was **R6,7bn**.

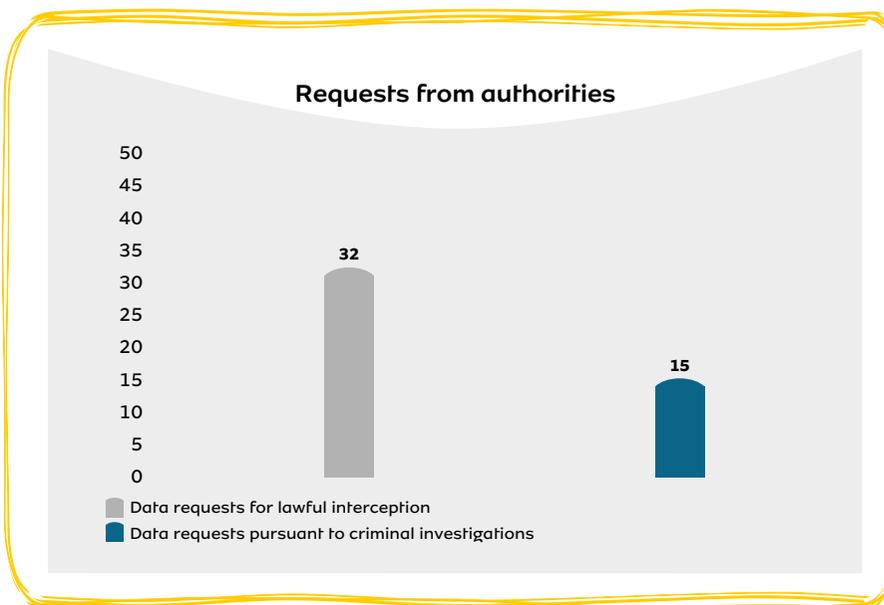
Lawful interceptions

• Legal framework

- The Preamble of Cameroon's Constitution.
- Article 42 and 44 of Law No. 2010/012 of 21 December 2010 relating to cybersecurity and cybercriminality in Cameroon.
- Article 54 and 80 of Law No. 2010/013 of 21 December 2010 relating to electronic communications in Cameroon.
- Article 45 of Law No. 2010/021 of 21 December 2010 relating to electronic commerce in Cameroon.
- Article 5-11 of Decree No. 2013/0399/PM of 27 February 2013 laying down conditions for the protection of consumers of electronic communication services.
- Article 17-20 of Decree No. 2015/3759 of 3 September 2015 laying down conditions for the identification of subscribers and terminal equipment of electronic communications networks.
- Article 12 of Decree No. 2017/2580/PM of 6 April 2017 laying down conditions for the establishment and exploitation of electronic communication networks that are subject to the regime of authorisation.
- Article 7.3 and 7.4 of the MTN Cameroon concession agreement of 11 March 2015 terms of reference.
- Law No. 2005/007 of 27 July 2005 on the Criminal Procedure Code.

• Authorities

- The Minister of Posts and Telecommunications.
- The Telecommunications Regulatory Board.
- The National Agency of Information and Communications Technology.



- Authority requests fulfilled: 47

MTN Congo-Brazzaville

Introduction

MTN has been present in Congo-Brazzaville since 2005. MTN has approximately **3,1m** subscribers in Congo-Brazzaville. In 2020, MTN's revenue in Congo-Brazzaville was **R3,4bn**.

Lawful interceptions

• Legal framework

- Article 26 of the Constitution of the Republic of the Congo of 6 November 2015.
- Law No. 8-2001 of 12 November 2001, on freedom of information and communication.
- Law No. 29-2020 of 10 October 2020, on the protection of personal data.
- Law No. 30-2020 of 30 October 2020 on the creation of the national agency of information system security.
- Article 4 and 6 of Law No. 26-2020 of 5 June 2020 on cybersecurity.
- Law No. 27-2020 of 5 June 2020 on fighting cybercrime.
- Law No. 9-2009 of 25 November 2009, on the regulation of electronic communications.
- Article 18-20 of Law No. 073/84 of 17 October 1984 on Family Code.
- Law No. 11-2020 of 25 November 2009, on the creation of the regulatory agency for posts and electronic communications.
- Law 43-2020 of 20 August 2020 authorising the ratification of the convention of the African Union on cybersecurity and the protection of personal data*.
- The Republic of Congo is one of six member countries of the Central African Economic and Monetary Community (CEMAC). As such, at a regional level, Digital Human Rights are regulated by the CEMAC through:
 - ~ Directive No. 06/08-UEAC-133-CM-18 defining the regime of universal service in the electronic communications sector among CEMAC state members.
 - ~ Directive No. 07/08-UEAC-133-CM-18 defining the legal framework of network and electronic communication services' users rights and protection in the CEMAC.
 - ~ Directive No. 08/08-UEAC-133-CM-18 on interconnection and access to network and electronic communications services in CEMAC state members.
 - ~ Directive No. 09/08-UEAC-133-CM-18 harmonising the legal framework of electronic communication activities in CEMAC state members.
 - ~ Directive No. 10/08-UEAC-133-CM-18 harmonising the rules of establishing and controlling tariffs for electronic communication services in the CEMAC.
 - ~ Directive No. 21/08-UEAC-133-CM-18 harmonising the rules and regulations of electronic communication in the CEMAC.

Requests from authorities



- Authority requests fulfilled: 1 600

• Authorities

- ARPCE – the Congolese Authority for the control, monitoring and regulation of the Post and Electronic Communications sectors.
- National Agency for the Security of Information Systems.
- The Directorate General of Post and Telecommunications

Introduction

MTN has been present in eSwatini since 1998. The joint venture has approximately **990 000** subscribers in eSwatini. In 2020, MTN's revenue in eSwatini was **R418m**.

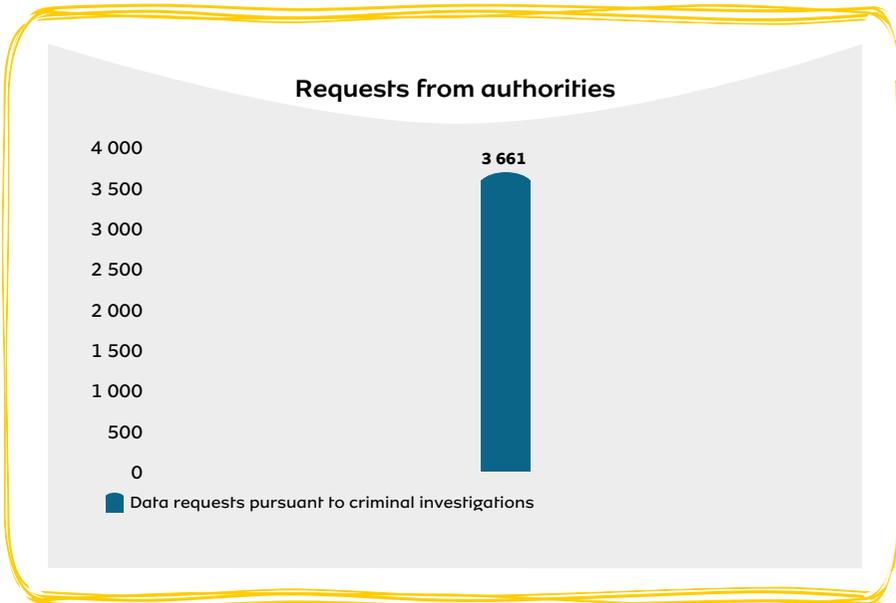
Lawful interceptions

• Legal framework

- Section 24(1) and 24(2) of the Constitution of the Kingdom of Swaziland Act 1 of 2005.
- Section 10(4) of the SIM Registration Regulations, 2016.
- The Data Privacy Bill.
- Section 49(1) of the Criminal Procedure and Evidence Act 1938.
- Section 18 of the Constitution (Protection from Inhumane Treatments which when interpreted by the Courts, includes the right to privacy) of the Kingdom of eSwatini Act No. 001/2005.
- The Swaziland Communications Commission Act No. 10/2013.
- The Electronic Communications Act No. 09/2013.
- The Swaziland Communications Commission (Consumer Protection) Regulations, 2016.
- The Swaziland Communications Commission (Subscriber Registration) Regulations, 2016.
- The Televisions Guidelines, 2017.

• Authorities

- The Ministry of Information Communication and Technology.
- The eSwatini Communications Commission.
- The Anti-Corruption Commission.
- The eSwatini Revenue Authority.
- The Royal eSwatini Police.
- The Courts.



- Authority requests fulfilled: 3 661

Introduction

MTN has been present in Ghana since 2006. MTN has approximately **24,4m** subscribers in Ghana. In 2020, MTN’s revenue in Ghana was **R17,2bn**.

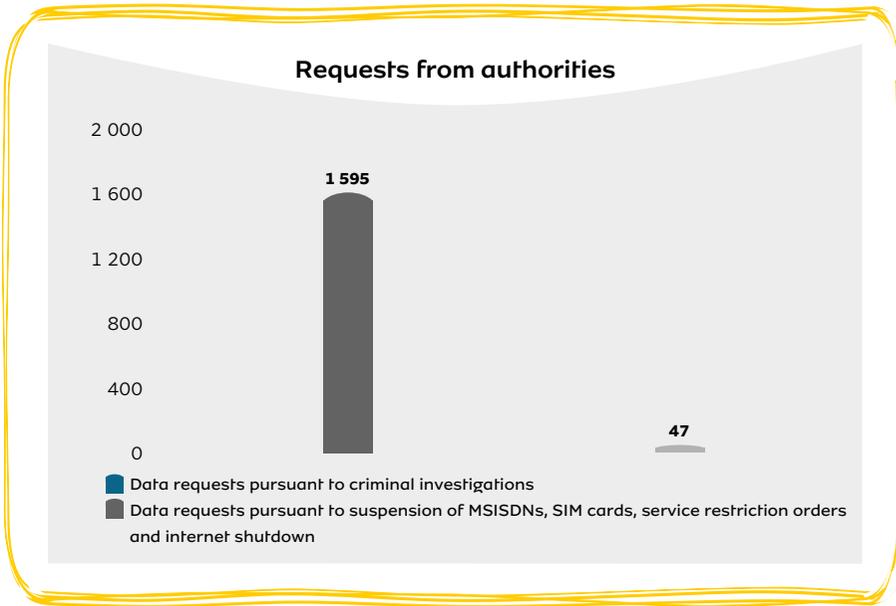
Lawful interceptions

• **Legal framework**

- The Cybersecurity Act, 2020 (Act 1038).
- The Electronic Communications Act, 2008 (Act 775).
- The Electronic Transactions Act, 2008 (Act 772).
- The Data Protection Act, 2012 (Act 843).
- Electronic Communications Regulations, 2011.
- Subscriber Identity Module (SIM) Registration Regulations, 2011 (L.I. 2006)
- Anti-Money Laundering Act, 2020 (Act 1044).
- Anti-Terrorism Act, 2008 (Act 762).
- Economic and Organised Crime Act, 2010 (Act 804).
- Banks and Specialised Deposit-taking Institutions Act, 2016 (Act 930).
- Payment Systems and Services Act, 2020 (Act 987).
- Right to Information Act, 2020 (Act 989).
- Establishment of Emergency Communications Systems Instrument, 2020 (EI 63).

• **Authorities**

- The Courts.
- The National Communications Authority.
- Security and law enforcement agencies (Ghana Police Service, National Intelligence Bureau (formerly, Bureau of National Investigations), National Security, Ghana Prisons Service, Ghana Immigration Service and Ghana Armed Forces).
- The National Information Technology Agency.
- The Data Protection Commission.
- The Financial Intelligence Centre.
- The Economic and Organised Crime Office.
- Narcotics Control Board
- The Bank of Ghana.



- Authority requests declined: one





Introduction

MTN has been present in Guinea-Bissau since 2005. MTN has approximately **889 000** subscribers in Guinea-Bissau. In 2020, MTN's revenue in Guinea-Bissau was **R473m**.

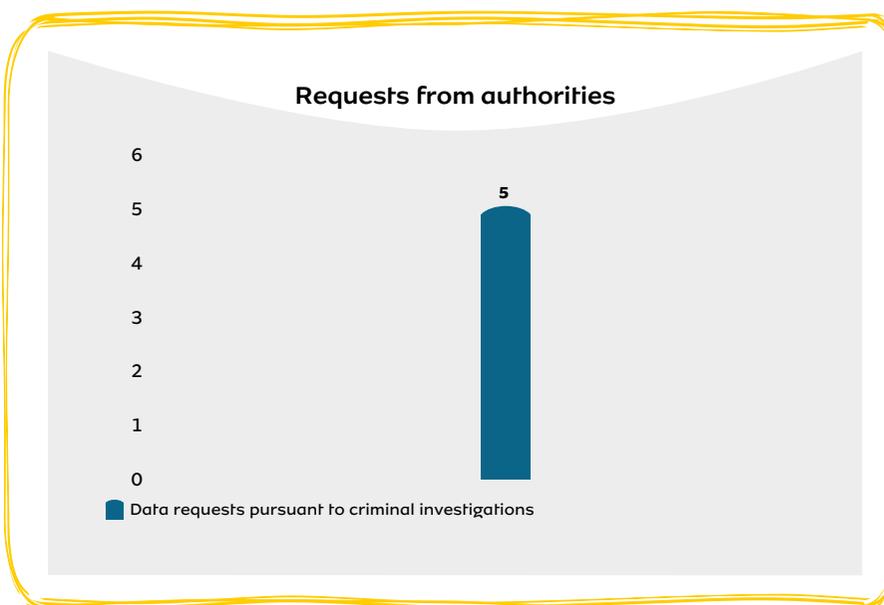
Lawful interceptions

• Legal framework

- The Constitution of the Republic of Guinea-Bissau.
- Article 3-5 and 10 of the Press Law 1/2013.
- Article 1, 2, 6 and 7 of the Press Freedom Law.
- Article 141 of the Criminal Code.
- Article 44 of Constitution of the Republic of Guinea-Bissau.
- Law 7/2010, of 22 June 2010 – the Information Security Services Law.
- Resolution 2/2018, of 25 June 2018 – approval of government programmes and initiatives.
- Law 5/2010, of 27 May 2010 – the National Regulatory Authority Law.
- Law 10/1997, of 2 December 1997 – the Banking Regulations Law.

• Authorities

- The Regulator (*Agence Nationale de la Sécurité des Systèmes d'information* (ARN)).
- The National Regulatory Authority.
- The National Media Regulator.
- The Criminal Courts.



- Authority requests fulfilled: five



MTN Guinea-Conakry

Introduction

MTN has been present in Guinea-Conakry since 2005. MTN has approximately **4,3m** subscribers in Guinea-Conakry. In 2020, MTN's revenue in Guinea-Conakry was **R1,5bn**.

Lawful interceptions

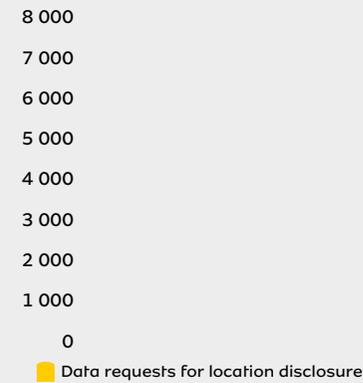
• Legal framework

- The 2020 Guinean Constitution under its Title II – Rights – Freedom and Duties.
- The law L/2016/059/AN dated 26 October 2016 carrying on Criminal Code of the Republic of Guinea under the Title III – Cybercriminality (Art. 856 to Art. 879).
- The No/2015/018/AN related to telecommunication and technologies of information in Republic of Guinea under Article 116 dated 13 August 2015.
- The African Union Convention on Cyber Security and Personal Data Protection dated 14 June 2014.
- The Additional Act A/SA.1/01/10 related to protection of personal data in the ECOWAS area dated 16 February, 2010.
- The Law L/2016/037/AN related to cybersecurity and the protection of personal data in Republic of Guinea dated 26 July 2016.

• Authorities

- L'Autorité de Régulation des Postes et Télécommunications (Regulatory body).

Requests from authorities



- Authority requests declined: 720
- Authority requests fulfilled: 6 480



Introduction

MTN has been present in Côte d'Ivoire since 2005. MTN has approximately **13,2m** subscribers in Côte d'Ivoire. In 2020, MTN's revenue in Côte d'Ivoire was an estimated **R8,8bn**.

Lawful interceptions

• Legal framework

- Article 19 of the Constitution of the Republic of Côte d'Ivoire dated 8 November 2016.
- Law No. 2013-450 dated 19 June 2013 related to data privacy.
- Law No. 2013-451 dated 19 June 2013 combatting cybercrime.
- Article 15 of Law No. 2015-493 dated 7 July 2015 combatting terrorism.
- Order No. 2012-293 of 21 March 2012 relating to Telecommunications and Information and Communication Technologies.
- Law No. 2013-546 of 30 July 2013 on electronic transactions.
- Law No. 2017-802 of 7 December 2017 on the orientation of the information society in Côte d'Ivoire (sets the general, legal and institutional principles of the information society in Côte d'Ivoire).
- Decree No. 2012-934 of 19 September 2012 on the organisation and operation of L'Autorité de Régulation des Télécommunications/Information and Communications Technology (ICT) de Côte d'Ivoire.
- Decree No. 2013-301 of 2 May 2013 on the approval of terminal and radio equipment and the approval of installers.
- Decree No. 2013-439 of 13 June 2013 setting the conditions and procedures for reserving, allocating and withdrawing numbering resources, as well as the amounts and procedures for payment of fees for the use of numbering resources.
- Decree No. 2015-812 of 18 December 2015 approving the specifications attached to each individual licence in category C 1 A, for the establishment of networks and the provision of Telecommunications/ICT services.
- Decree No. 2017-193 of 22 March 2017 on the identification of subscribers to Telecommunications/ICT services open to the public and users of cybercafés.
- Decree No. 2018-875 of 22 November 2018 establishing the powers, composition, organisation and functioning of the National Commission for the Development of the Information Society.
- Directive No. 02/2006/CM/UEMOA on the harmonisation of legal regimes applicable to telecommunication network operators and service providers.
- Additional Act A/SA. 3/01/07 ECOWAS of 19 January 2007 on the legal regime applicable to operators and service providers.

Requests from authorities



- Authority requests fulfilled: 4 215

• Authorities

- Ministry of Justice and Human Rights.
- Ministry of Security.
- Ministry of Defence.
- L'Autorité de Régulation des Télécommunications/ICT de Côte d'Ivoire (Telecommunications/ICT Regulatory Authority of Côte d'Ivoire).
- Agence Ivoirienne de Gestion des Fréquences radioélectriques (Ivorian Radio Frequency Management Agency).
- Agence Nationale du Service Universel des Télécommunications (National Universal Telecommunications Service Agency).
- Platform for Combatting Cybercrime.
- Police administrations.

MTN Liberia

Introduction

MTN has been present in Liberia since 2005. MTN has approximately **1,7m** subscribers in Liberia. In 2020, MTN's revenue in Liberia was **R886m**.

Lawful interceptions

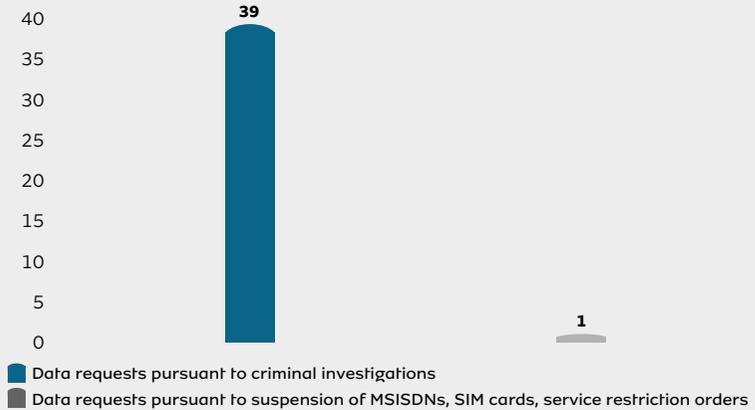
• Legal framework

- Article 49-52, 69, 70 and 71 of the Liberia Telecommunications Act 2007.
- Article 15 of the Liberian Constitution (1986).
- Supplementary Act A/As. 1/01/10 on Personal Data Protection Within ECOWAS.
- Amended SIM Cards/Removable User Identity Module Registration Regulations.
- Liberia's country code Top Level Domain (ccTLD). Regulation for its Re-delegation, Management and Operations, 2020.
- Regulations for the Treatment of Confidentiality, Dispute Resolution, Compliance and Enforcement 2009 LTA-REG-0002.
- Regulation C/Reg 21/12/17 on Roaming on Public Mobile Communications Network in the ECOWAS Region.
- Interconnection Regulations 2009 LTA-REG-0003.
- LTA Order: 0018-01-15-20 On the Implementation of Free Roaming on Public Mobile Communications Networks in the ECOWAS Region.
- LTA Order: 0018-03-12-20 Implementing the SIM Card Registration Regulations.
- Regulations on International Traffic LTA-REG-0005.

• Authorities

- The Liberia Telecommunications Authority.
- The Ministry of Justice.
- The Court of Liberia.

Requests from non-government entities



Introduction

MTN has been present in Nigeria since 2001. MTN has approximately **76,5m** subscribers in Nigeria. In 2020, MTN's revenue in Nigeria was an estimated **R58,0bn**.

Lawful interceptions

• Legal framework

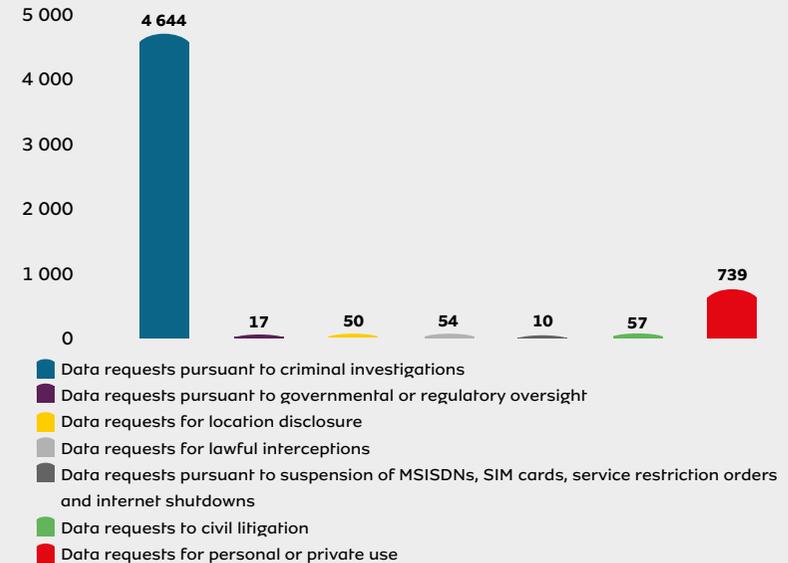
- Section 37-39 of the Constitution of the Federal Republic of Nigeria 1999 (as amended).
- Part 3 1-16 of the Nigerian Data Protection Regulation 2020.
- Section 38(5) of the Cybercrimes (Prohibition, Prevention, etc.) Act, 2015.
- Section 8 of the Nigerian Communications (Enforcement Process, etc.) Regulations, 2020.
- Section 20, 26 and 28 of the National Identity Management Commission Act, 2007.
- NDPR Implementation Framework, 2020*.
- The Consumer Code of Practice Regulations, 2007.
- Criminal Code Act.
- Defamation Law of the various states.
- Penal Code and penal laws of the various states (1).
- The Registration of Telephone Subscribers Regulation, 2011.
- The Lawful Interception of Communications Regulation, 2020.

• Authorities

- The Nigeria Communications Commission.
- Nigerian Courts.
- Relevant authorities defined under section 20 of the Nigerian Communications (Enforcement Process, etc.) Regulations, 2020.
- The National Identity Management Commission.
- The National Information Technology Development Agency.
- The Nigerian Police Force.
- Various law enforcement Agencies.

* Footnote reference.

Requests from authorities



- Authority requests declined: 24
- Authority requests fulfilled: 4,751
- Non-governmental requests declined: five
- Non-governmental requests fulfilled: 791

MTN Rwanda

Introduction

MTN has been present in Rwanda since 1998. MTN has approximately **6,1m** subscribers in Rwanda. In 2020, MTN's revenue in Rwanda was **R2,6bn**.

Lawful interceptions

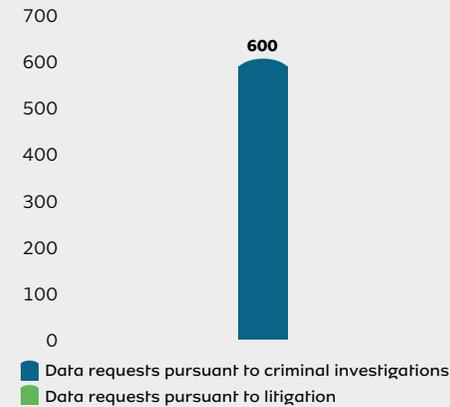
• Legal framework

- Law No. 75/2020 OF 29/01/2020 on Prevention and Punishment of Money Laundering, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction.
- The Constitution of Rwanda 2003 with amendments through 2015.
- Law No. 04/2013 of 08/02/2013 relating to access to information.
- Law No. 02/2017 of 18/02/2017 establishing Rwanda Information Society Authority.
- Law No. 26/2017 of 31/05/2017 establishing the National Cyber Security Authority.
- Law No. 09/2013 of 01/03/2013 establishing Rwanda Utilities Regulatory Authority (RURA).
- Law No. 60/2018 of 22/8/2018 on Prevention and Punishment of Cyber Crimes.
- Law No. 60/2013 of 22/08/2013 regulating the interception of communications.
- Law No. 02/2013 of 08/02/2013 regulating Media.
- Law No. 73/2018 of 31/08/2018 governing Credit Reporting System.
- Articles 5, 11, 13 and 14 of the Cybersecurity Regulation No. 010/R/CR-CSI/RURA/020 of 29/05/2020.
- Article 45 on Data retention and Audit trails and Article 47 on the Confidentiality of Data on Payment Services Regulation No. 31/2020 OF 16/12/2020 on Protection of Payment Users. (Official Gazette No. 7 of 24/02/2020).
- Articles 9 to 13 Law No. 75/2020 of 29/01/2020 on Prevention and Punishment of Money Laundering, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction.

• Authorities

- The Ministry of ICT and Innovation.
- The Rwanda Utilities Regulatory Authority.
- The National Bank of Rwanda.
- The Rwanda Information Society Authority (RISA).
- The National Cyber Security Authority (NCSA).

Requests from authorities and non-government entities



- Authority requests fulfilled: approximately: 602
- Non-governmental requests declined: seven

Introduction

MTN has been present in South Africa since 1994. MTN has approximately **32m** subscribers in South Africa. In 2020, MTN's revenue in South Africa was **R45,5bn**.

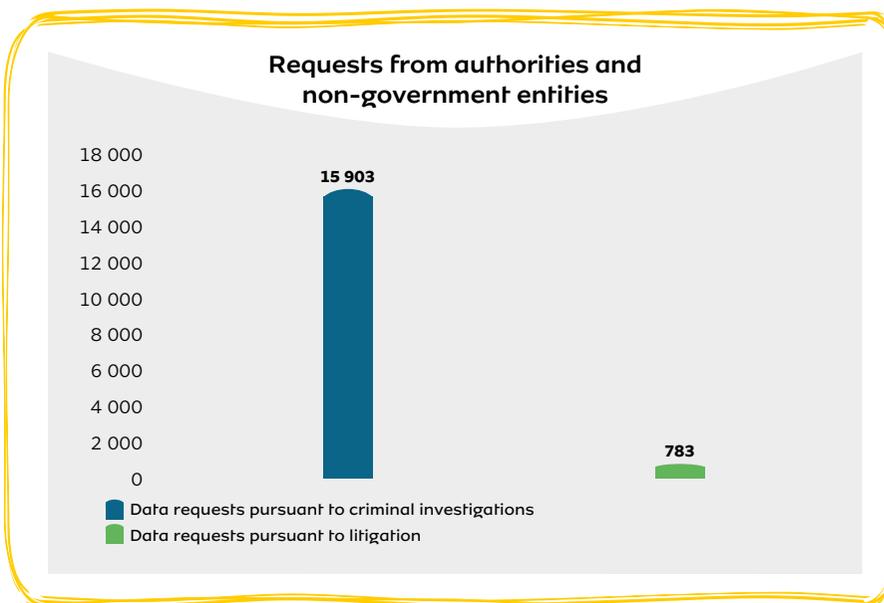
Lawful interceptions

• Legal framework

- Constitution of the Republic of South Africa, 1996.
- Promotion of Access to Information Act, 2 of 2000.
- Regulation of Interception of Communications and Provision of Communication-related Information Act, No. 70 of 2002.
- Electronic Communications and Transactions Act, 25 of 2002.
- Electronic Communications Act, 36 of 2005.
- Consumer Protection Act, 68 of 2008.
- Protection of Personal Information Act, 4 of 2013.

• Authorities

- The Department of Justice and Constitutional Development.
- The National Prosecuting Authority.
- The South African Police Service.
- The State Security Agency.
- The Information Regulator.
- The South African Human Rights Commission.
- Independent Communications Authority.
- National Consumer Commission.
- Competition Commission.
- Consumer Goods and Services Ombud.
- Credit Ombud.
- Internet Service Providers Association of South Africa.



- Authority requests fulfilled: 15 903
- Non-governmental requests fulfilled: 783

MTN South Sudan

Introduction

MTN has been present in South Sudan since 2011. MTN has approximately **1,7m** subscribers in South Sudan. In 2020, MTN's revenue in South Sudan was **R3,1bn**.

Lawful interceptions

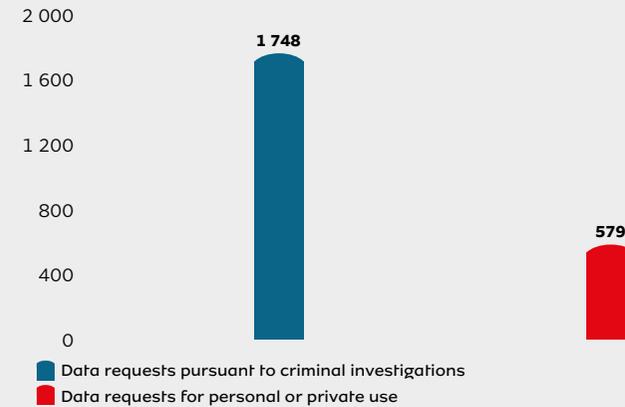
• Legal framework

- Right of Access to Information Act 2013.
- The Transitional Constitution of the Republic of South Sudan, 2011.
- Media Authority Act 2013, No. 64.
- Broadcasting Corporation Act 2013, No. 63.
- National Communication Act 2012, No. 24.
- The Penal Code, 2008.
- National Communications Licensing Regulations, 2016.

• Authorities

- Services Ministry of Information Communication Technology and Postal Services: this ministry is headed by the National Minister of Information.
- National Communication Authority established under section (7) of the National Communication Act, 2012.
- Information Commission: is headed by Information commissioners.
- High Court: Article 130 of the Transitional Constitution of South Sudan.
- The Supreme Court: Article 126 of the Transitional Constitution of South Sudan.

Requests from authorities and non-government entities



Introduction

MTN has been present in Sudan since 2005. MTN has approximately **9,6m** subscribers in Sudan. In 2020, MTN's revenue in Sudan was **R3,3bn**.

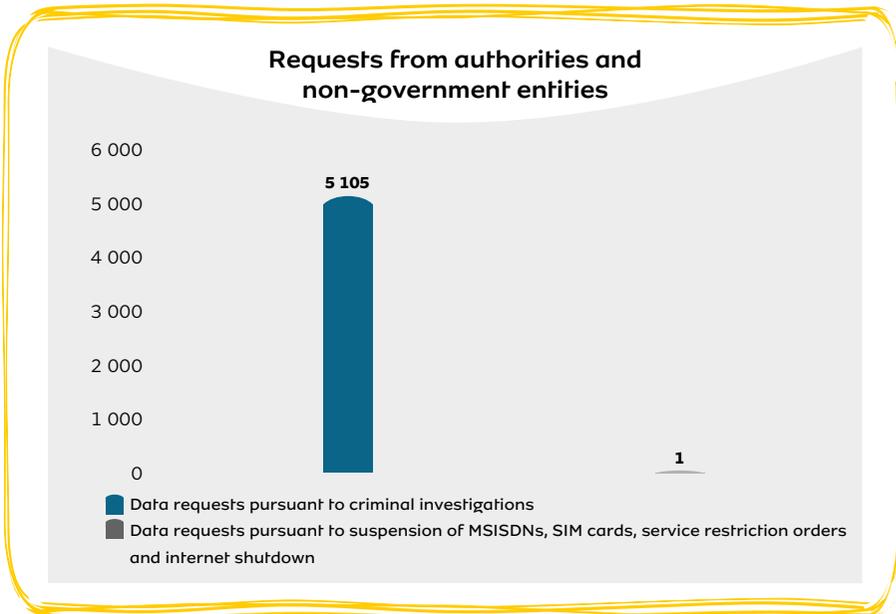
Lawful interceptions

• Legal framework

- Article 6, 73 and 74 of the Telecommunication and Postal Regulation Act of 2018.
- Article 5 of the MTN Licence Agreement 2003.
- Article 166 of the Law for Criminal of 1991.
- The Criminal Information Act 2018.
- Criminal Law 1991.
- The Electronic Transactions Act 2007.
- The Draft Constitutional Charter for the Transitional Period 2020.
- The General Telecommunications Regulation 2012.
- The Combating Information Crimes Act 2018.
- The Access to Information Act 2015.
- Licence Agreement between Telecommunications Companies and the Telecommunications and Post Regulatory Authority.
- Press and Press Printed Materials Act 2009.
- The National Security Act 2010.
- The Filtering and Blocking of Sites and Pages on the Internet Regulation 2020.
- The Criminal Code 1991.

• Authorities

- The Telecommunication and Postal Regulatory Authority.
- The Constitutional Court.
- The Minister of Communications and Information Technology.
- The Information Crimes Court.
- The Information Prosecution.
- The Information Police.
- The Right of Access to Information Commission.
- The General Court.
- The Press and Press Printed Materials National Council.



- Authority requests fulfilled: 5 105

MTN Uganda

Introduction

MTN has been present in Uganda since 1998. MTN has approximately **14,2m** subscribers in Uganda. In 2020, MTN's revenue in Uganda was **R8,3bn**.

Lawful interceptions

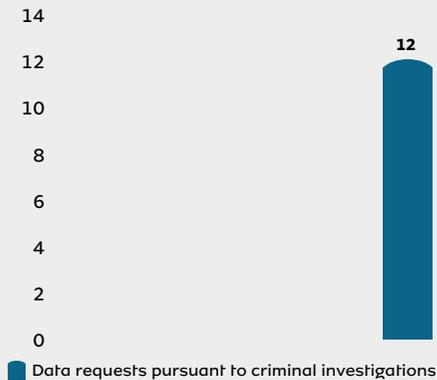
• Legal framework

- Article 27(2) and 29 of the Constitution of the Republic of Uganda, 1995.
- The Uganda Communications Act, 2013.
- The National Payment Systems Act, 2020.
- The Anti-Money Laundering Act, 2013 (as amended).
- Section 2, 8, 10, 11 and 15 of the Regulation of Interception of Communications Act, 2012.
- Section 7 and 9-and 29 Data Protection and Privacy Act, 2020.
- Section 10, 11, 24, 25 and 26 of the Computer Misuse Act, 2011.
- Section 32(2) of the Electronic Transactions Act, 2011.
- The Uganda Communications (Intelligent Network Monitoring System) Regulations, 2020.
- Uganda Communications (Centralised Equipment Identification Register) Regulations 2020.
- The Uganda Communications (Text and Multimedia Messaging) Regulations, 2020.
- The Uganda Communications (Consumer Protection) Regulations, 2020.
- The Uganda Communications (Content) Regulations, 2020.
- Guideline 12(c)(i) – (iii) of the Mobile Money Guidelines, 2013.

• Authorities

- The Uganda Police Force.
- The Uganda Communications Commission.
- The National Information Technology Authority.
- The Bank of Uganda.
- The Ministry of Internal Affairs.
- The Ministry of Information and Communications Technology and National Guidance.
- The Financial Intelligence Authority.

Requests from authorities



- Authority requests fulfilled: 12

Introduction

MTN has been present in Zambia since 2005. MTN has approximately **8,2m** subscribers in Zambia. In 2020, MTN's revenue in Zambia was **R2,6bn**.

Lawful interceptions

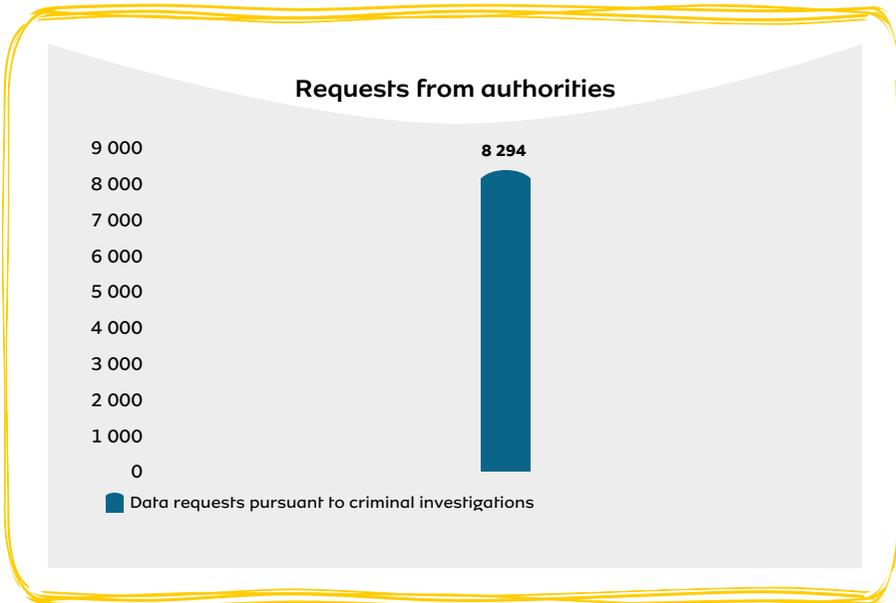
• Legal framework

- Article 20 of the Constitution, 1996.
- Section 41-43 and 64 of the Electronic Communications and Transactions Act No. 21 of 2009.
- Regulation 40 of Statutory Instrument No. 71 of 2011.
- Cyber Security and Cyber Crimes Bill (Not yet law and is undergoing drafting).
- The Electronic Communications and Transactions Bill of 2020*.
- The Financial Intelligence Centre Act No. 46 of 2010.
- The Zambia Information and Communication Technology Agency Network Licence Standard Terms and Conditions.
- The Penal Code Act Chapter 87 of the Laws of Zambia.
- The Competition and Consumer Protection Act No. 24 of 2010.
- The Copyright and Performance Rights Act, Chapter 406 of the Laws of Zambia.

• Authorities

- the Zambia Information and Communications Technology Agency established under the Information and Communication Technologies Act No. 15 of 2009.
- the Zambia Police Service.
- the Drug Enforcement Commission.
- the Anti-Corruption Commission.
- the Human Rights Commission.
- the Public Protector.
- the Zambia Security Intelligence Service.

* Footnote reference.



- Authority requests fulfilled: 8 294





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