

C0. Introduction

C0.1

**(C0.1) Give a general description and introduction to your organization.**

MTN is Africa’s premier telecommunications network provider, established in South Africa at the dawn of the country’s democracy in 1994. Born in a period of transition, MTN prides itself in being a leader in transformation. The MTN Group has a clear vision to lead the delivery of a bold new digital world to our customers in 19 markets in Africa and the Middle East. MTN is Africa’s largest mobile network operator, providing voice, data, fintech, digital, enterprise, wholesale and API services to more than 270 million customers across our Operating Companies (OPCOs).

This report covers operations in Afghanistan, Benin, Cameroon, Congo-Brazzaville, Guinea-Bissau, Guinea-Conakry, Ghana, Côte d’Ivoire, Liberia, Nigeria, Rwanda, South Africa, Sudan, South Sudan, Eswatini, Uganda, Zambia, and MTN Enterprise operations in Kenya and Namibia. MTN Yemen and MTN Syria were excluded from 2021 reporting where data collection was challenging as a result of MTN exiting these markets as part of our phased exit of the Middle East. Mascom Botswana is excluded from sustainability reporting based on MTN not having operational control, with the exception of carbon management information, which is included, based on our indirect minority ownership holding. Iran is included in sustainability reporting, with the exception of carbon management information which is excluded based on our indirect ownership holding. Some MTN Group head office services are undertaken in the United Arab Emirates (Dubai) in leased offices and has been incorporated into environmental reporting.

We are inspired by our belief that everyone deserves the benefits of a modern connected life. COVID-19 showed us how inter-connected we all are: the health and prosperity of one depends on the health and prosperity of all. It also accelerated digital transformation and laid bare the extent of the digital and financial divide across the world. We remain committed to bridging this divide, furthering digital and financial inclusion, and advancing the attainment of the United Nations Sustainable Development Goals (SDGs) through our core business activities and our support to governments, communities and customers.

In 2021, we continued to deliver on our Ambition 2025 strategy which is focused on leading digital solutions for Africa’s progress, harnessing the power of MTN’s leading brand, talented workforce, broad geographic footprint, connectivity infrastructure and technology platforms. Our Ambition 2025 strategy is focused on the overall sustainable development of our business and Network. Our strategy is anchored in building the largest and most valuable telecommunications platform with a clear focus on Africa. This includes mobile and fixed access networks in the consumer, enterprise and wholesale segments. We are accelerating implementation of our network infrastructure through strategic partnerships. Our strategy is supported and funded through enhanced cost and capex efficiencies. When we started our journey, it was our ambition to brighten lives through the power of connectivity, and this continues to be a priority for us. We recognize the fact that Africa is young, dynamic and ambitious, therefore we have established key performance indicators (KPIs) that are designed to build our core business sustainably and strengthen our operations. We see the opportunity to continue harnessing the power of MTN – not only through our brand strength, our footprint and best-in-class connectivity infrastructure, but by offering technology platforms that are second to none, through Ambition 2025, our integrated platform strategy.

MTN has joined the GSMA-led industry-wide plan to achieve net-zero greenhouse gas (GHG) emissions. MTN is committed to protecting our planet by achieving Net Zero emissions by 2040. In 2021, MTN’s Scope 1 and Scope 2 emissions decreased by ~16% compared to 2019 levels, and MTN has been actively engaging with our suppliers to encourage reductions of our Scope 3 emissions. In 2022, MTN continues to ensure that all operating companies develop country-specific action plans to align with our Net Zero goals.

MTN is listed on the Johannesburg Stock Exchange in South Africa under the share code "MTN" and had a market capitalization of R321.7 billion at the end of 2021. The company has made material progress with its ESG priorities with the inclusion of MTN Group in the FTSE/JSE Responsible Investment Top 30 Index in 2022, reflecting the tremendous progress we have made in our sustainability journey.

C0.2

**(C0.2) State the start and end date of the year for which you are reporting data.**

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1 2021	December 31 2021	No	<Not Applicable>

C0.3

**(C0.3) Select the countries/areas in which you operate.**

Afghanistan  
Benin  
Botswana  
Cameroon  
Congo  
Côte d'Ivoire  
Eswatini  
Ghana  
Guinea  
Guinea-Bissau  
Liberia  
Nigeria  
Rwanda  
South Africa  
South Sudan  
Sudan  
Uganda  
United Arab Emirates  
Zambia

**C0.4**

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**(C0.4) Select the currency used for all financial information disclosed throughout your response.**

ZAR

**C0.5**

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**(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.**

Operational control

**C0.8**

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**(C0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?**

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, an ISIN code	ZAE000042164

**C1. Governance**

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**C1.1**

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**(C1.1) Is there board-level oversight of climate-related issues within your organization?**

Yes

**C1.1a**

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**(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.**

Position of individual(s)	Please explain
Chief Executive Officer (CEO)	The Group President and CEO oversees the overall MTN business, which includes sustainability and climate change related issues. The CEO has delegated executive responsibility for sustainability and climate change to the Group Chief Sustainability and Corporate Affairs Officer. This officer, working alongside the Group Information and Technology Officer, is responsible for sustainability and climate change, which create the foundations for a more sustainable business. Environmental, Social and Governance practices are implemented across our markets, guided by the Group sustainability division, in partnership with functional areas and business functions. In 2021, our Group President and CEO committed to achieve Net Zero by 2040 and further cemented its intention by signed a pledge with the SBTi which formally commits the MTN Group to a Net Zero ambition. In 2022, MTN is working to validate its science-based targets with the SBTi.
Director on board	Climate change is a critical priority for the MTN Group and its operating companies, and the Board of directors has overall accountability for climate-related issues and sustainability. The company has also assigned the Chairman of the Social, Ethics and Sustainability Committee the role of designated climate change Board Member. He is responsible for ensuring climate-related risks and opportunities are appropriately addressed within the MTN Group and across MTN's markets. He supports the MTN Group Board in remaining accountable to its shareholders for the long-term climate change response of the organisation and overseeing effective management of climate-related risks, opportunities and impacts. In this role, he also provides oversight on the identification of climate-related risks in the short, medium and long term and ensure appropriate action. He is also responsible for the oversight of sustainability activities which are delegated to the Group's Social, Ethics and Sustainability Committee. Some examples of climate-related decisions made by the Board has been MTN's Project Zero strategy, climate change targets and implementation plan to meet Net Zero by 2040.
Chief Sustainability Officer (CSO)	As indicated, the MTN Group President and CEO has delegated executive responsibility for climate change and sustainability to the Group Chief Sustainability and Corporate Affairs Officer. This officer is responsible for supporting the company's Ambition 2025 strategy. The Chief Sustainability and Corporate Affairs Officer has the responsibility to reinforce the implementation of our strategic priorities to create shared value and the integration of ESG at the core our business. The role's main areas of focus are on decarbonisation; rural connectivity; greater diversity and inclusion; enhanced stakeholder management; and protecting digital human rights.
Other C-Suite Officer	The Group Chief Information and Technology Officer is responsible for ensuring that Project Zero leverages the latest technologies and service partners to enable sustainability via greater energy efficiencies, low carbon emissions, risk reduction and cost control. The Group Technology Officer is working alongside the Chief Sustainability and Corporate Affairs Officer to actively drive carbon emission sustainability and supplier engagement to introduce sustainable technology alternatives. The Group Technology Officer is also responsible for MTN's annual Greenhouse Gas Footprint quantification and Target setting. MTN's Net Zero approach development also sits under Group Information and Technology given that its heavily dependent on the technologies applied across MTN's network operations.
Other C-Suite Officer	MTN's Group Chief Risk officer is responsible for the management of enterprise-wide risk, which is integral to MTN's growth strategy and includes climate related risks and tracking of the required Group-wide risk mitigation measures.

**C1.1b**

**(C1.1b) Provide further details on the board's oversight of climate-related issues.**

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – all meetings	<ul style="list-style-type: none"> <li>Reviewing and guiding strategy</li> <li>Reviewing and guiding major plans of action</li> <li>Reviewing and guiding risk management policies</li> <li>Reviewing and guiding annual budgets</li> <li>Reviewing and guiding business plans</li> <li>Setting performance objectives</li> <li>Monitoring implementation and performance of objectives</li> <li>Overseeing major capital expenditures, acquisitions and divestitures</li> <li>Monitoring and overseeing progress against goals and targets for addressing climate-related issues</li> </ul>	<Not Applicable>	<p>Sustainability is at the core of MTN's business strategy as we strive to create shared value for our stakeholders. Our vision is to drive economic value through responsible environmental, social and governance practices as outlined within our sustainability framework.</p> <p>To realize our vision, our sustainability approach is organized into four pillars with defined performance objectives: sound governance, sustainable economic value, eco-responsibility and sustainable societies. Together, these four pillars guide the areas we are most focused on, to ensure we operate responsibly and sustainably. MTN Group's sustainability approach focuses on reducing and mitigating the Group's environmental impact, supporting vibrant and successful communities, enabling a strong governance and ethical culture, and improving digital and financial innovations.</p> <p>The execution of sustainability and climate change related matters is driven by the Group Chief Sustainability and Corporate Affairs Officer, and the Group Chief Information and Technology Officer. This ensures that sustainability objectives are driven by and within core business functions and business areas, and integrated within business strategy, planning and management cycles.</p> <p>MTN has an established group-level risk management framework that it relies upon to identify, prioritise and manage risks to the business. This includes risks related to the Company's energy strategy, carbon footprint, climate change, extreme weather conditions and climate policies. Identified risks are incorporated into a risk register, including any mitigation measures and the action owner within the organisation. The risk register is compiled by a team of managers and reported to the Board on a quarterly basis. Risks are categorised as short term, medium term and long term. On a monthly basis, risks are reported in the Group Principal Risk Report, which includes risk assessments and quantification of MTN's existing and emerging environmental risks driven by Group Sustainability &amp; Risk functions.</p> <p>On a monthly basis, risks are reported in the Group Principal Risk Report, which includes risk assessments and quantification of MTN's existing and emerging environmental risks. Given that the largest impact stems from energy consumption, our Technology teams are responsible for ensuring energy efficiency and reduction measures are implemented across the Group. Business plans and objectives in this regard are overseen jointly with Group Technology and Group Sustainability functions, and reports are compiled on a monthly basis by operations in partnership with the various markets. Progress toward our climate-related goals is reported annually through the publication of annual reports such as MTN's Sustainability Report and Integrated Annual Report, which are reviewed and signed off at Board level.</p>

**C1.1d**

**(C1.1d) Does your organization have at least one board member with competence on climate-related issues?**

	Board member(s) have competence on climate-related issues	Criteria used to assess competence of board member(s) on climate-related issues	Primary reason for no board-level competence on climate-related issues	Explain why your organization does not have at least one board member with competence on climate-related issues and any plans to address board-level competence in the future
Row 1	Yes	MTN Group Board recently re-examined the mandates of its committees and evaluated the skills on the Board, identifying the need to recruit and retain more sustainability talent to ensure execution of its Ambition 2025 strategy. MTN Group has appointed the Chairman of the Social, Ethics and Sustainability Committee as designated climate change Board member. MTN Group assessed the competency, qualifications and experience of the board member to provide sound governance advisory and stewardship to the board and management. MTN Group ensured that multiple Board members had skills and experience in science, technology, engineering and operations to govern climate risks and opportunities effectively. The Board has also ensured that the executive team has the knowledge, skills and experience to make informed decisions about climate risks and opportunities.	<Not Applicable>	<Not Applicable>

**C1.2**

**(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.**

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Chief Executive Officer (CEO)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Other C-Suite Officer, please specify (Climate-change dedicated board member (Chairman of the Social, Ethics and Sustainability Committee))	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Quarterly
Other C-Suite Officer, please specify (Chief Sustainability and Corporate Affairs Officer)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Other C-Suite Officer, please specify (Chief Information and Technology Officer)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Other C-Suite Officer, please specify (Group Chief Risk Officer)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Other, please specify (Group Social, Ethics and Sustainability Committee complemented to in-country Board sub-committees)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	Quarterly
Other, please specify (General Manager: Group Sustainability & Share Value)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Environment/ Sustainability manager	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Other, please specify (Group Executive Corporate Affairs and Sustainability working alongside Executive)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly
Other, please specify (Senior Manager: Data Centre Facilities and Infrastructure)	<Not Applicable>	Both assessing and managing climate-related risks and opportunities	<Not Applicable>	More frequently than quarterly

**C1.2a**

**(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).**

Climate-related issues are considered throughout MTN's organizational structure. Our Group President and CEO drives the pursuit of our Ambition 2025 strategy, with ESG at the core, of which creating shared value is one of our four strategic pillars. This includes playing our part in mitigating the effects of climate change. Climate-related issues are the responsibility of the board and the Chairman of the Social, Ethics and Sustainability Committee is specifically dedicated to climate change. The climate change designated board member is responsible for ensuring climate risks and opportunities are appropriately addressed within the company, and ensuring that the board is held accountable to its shareholders for the long-term sustainability of the organization and overseeing effective management of climate-related impacts. The climate change designated Board Member is also responsible for the identification of climate-related risks in the short, medium and long term and ensuring appropriate actions to address these risks. The Board continues to engage in discussions about ESG, ESG trends, and best practices, with the goal of assisting management in better connecting with global ESG challenges and opportunities that are relevant to the Group's day-to-day operations, strategy and risk profile.

Group Sustainability and Corporate Affairs function, together with the Group Information and Technology department, is responsible for all sustainability as well as environmental and climate change risk identification, issues management and initiatives at MTN.

- Group Sustainability and Corporate Affairs compiles reports for monthly executive committee reviews, quarterly Social, Ethics and Sustainability Committee presentations, and annual sustainability reporting.

- Group Information and Technology is responsible for driving the annual greenhouse footprint development for the group, Net Zero targets and strategy development, and energy efficiency and reduction plans.

Energy, emissions, and reduction targets are monitored for all OPCO's using the Microsoft Power BI software. This is to ensure a collaborative approach and to ensure that sustainability and climate related actions are considered across the group. MTN is working towards reaching Net Zero by 2040, as such, the company is focused on reducing its emissions by implementing energy efficiency initiatives and adopting zero carbon solutions. Risks are monitored by the group to ensure that MTN can meet its Net Zero targets and any risks to this achievement are assessed and mitigated as needed.

**C1.3**

**(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?**

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	<p>In line with MTN's board incentives and remuneration KPI structure, the board member dedicated to climate-change related issues, Chairman of the Social, Ethics and Sustainability Committee, has KPIs related to ensuring climate issues are appropriately addressed, ensuring sustainability of the organization and overseeing effective management of climate-related impacts.</p> <p>MTN Group has linked the remuneration of senior executives with the Group's ESG targets. This supports the delivery of our Ambition 2025 strategy, and in particular the strategic priority to 'create shared value', with 'ESG at the core'.</p> <p>More specifically targets related to Net Zero is included in the remuneration of key members of management / c-suite members.</p> <p>The Group Chief Sustainability and Corporate Affairs Officers along with Chief Information and Technology Officer and all their direct reports have KPIs related to Sustainability and climate change. KPIs are defined and tracked on a quarterly and annual basis.</p>

**C1.3a**

**(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).**

Entitled to incentive	Type of incentive	Activity incentivized	Comment
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Entitled to incentive	Type of incentive	Activity incentivized	Comment
Board/Executive board	Monetary reward	Emissions reduction project Emissions reduction target Energy reduction project Energy reduction target Efficiency project Efficiency target Behavior change related indicator Environmental criteria included in purchases	Climate-related issues are integrated into our KPI structure for incentives. These are considered for short, medium- and long-term horizons. MTN actively acknowledges the need for a sustainable future and aims to align business strategy and growth to a sustainable growth framework. To future-proof MTN and capitalize on our move towards a digital-adopter mind set and flexi-workforce, we are shifting our thinking from traditional reward to creative reward employee sustainable engagement approaches. This will ensure that our reward offerings, practices and policies evolve, remain relevant and stay true to the business requirements. We continued our drive of enabling a high performance and rewarding culture at work. Our engagements with employees through various platforms on culture and reward matters, transformed many of our human capital metrics. Multiple interventions beyond the traditional performance management approach were implemented to ensure that each MTN personnel is driven by purpose and is aligned with the Group's Ambition 2025. Throughout the year, we encouraged employees to strive for team collaboration and to be driven by a larger purpose and contribute to the organization's success in the long run.
Board Chair	Monetary reward	Emissions reduction project Emissions reduction target Energy reduction project Energy reduction target Efficiency project Efficiency target Behavior change related indicator Environmental criteria included in purchases	Climate-related issues are integrated into our KPI structure for incentives. These are considered for short, medium- and long-term horizons. MTN actively acknowledges the need for a sustainable future and aims to align business strategy and growth to a sustainable growth framework. To future-proof MTN and capitalize on our move towards a digital-adopter mind set and flexi-workforce, we are shifting our thinking from traditional reward to creative reward employee sustainable engagement approaches. This will ensure that our reward offerings, practices and policies evolve, remain relevant and stay true to the business requirements. We continued our drive of enabling a high performance and rewarding culture at work. Our engagements with employees through various platforms on culture and reward matters, transformed many of our human capital metrics. Multiple interventions beyond the traditional performance management approach were implemented to ensure that each MTN personnel is driven by purpose and is aligned with the Group's Ambition 2025. Throughout the year, we encouraged employees to strive for team collaboration and to be driven by a larger purpose and contribute to the organisation's success in the long run.
Chief Executive Officer (CEO)	Monetary reward	Emissions reduction project Emissions reduction target Energy reduction project Energy reduction target Efficiency project Efficiency target Behavior change related indicator Environmental criteria included in purchases	Climate-related issues are integrated into our KPI structure for incentives. These are considered for short, medium- and long-term horizons. MTN actively acknowledges the need for a sustainable future and aims to align business strategy and growth to a sustainable growth framework. To future-proof MTN and capitalize on our move towards a digital-adopter mind set and flexi-workforce, we are shifting our thinking from traditional reward to creative reward employee sustainable engagement approaches. This will ensure that our reward offerings, practices and policies evolve, remain relevant and stay true to the business requirements. We continued our drive of enabling a high performance and rewarding culture at work. Our engagements with employees through various platforms on culture and reward matters, transformed many of our human capital metrics. Multiple interventions beyond the traditional performance management approach were implemented to ensure that each MTN personnel is driven by purpose and is aligned with the Group's Ambition 2025. Throughout the year, we encouraged employees to strive for team collaboration and to be driven by a larger purpose and contribute to the organization's success in the long run.

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Other C-Suite Officer	Monetary reward	Emissions reduction project Emissions reduction target Energy reduction project Energy reduction target Efficiency project Efficiency target Behavior change related indicator Environmental criteria included in purchases Supply chain engagement Company performance against a climate-related sustainability index	Climate-related issues are integrated into our KPI structure for incentives. These are considered for short, medium- and long-term horizons. MTN actively acknowledges the need for a sustainable future and aims to align business strategy and growth to a sustainable growth framework. To future-proof MTN and capitalize on our move towards a digital-adopter mind set and flexi-workforce, we are shifting our thinking from traditional reward to creative reward employee sustainable engagement approaches. This will ensure that our reward offerings, practices and policies evolve, remain relevant and stay true to the business requirements. We continued our drive of enabling a high performance and rewarding culture at work. Our engagements with employees through various platforms on culture and reward matters, transformed many of our human capital metrics. Multiple interventions beyond the traditional performance management approach were implemented to ensure that each MTN personnel is driven by purpose and is aligned with the Group's Ambition 2025. Throughout the year, we encouraged employees to strive for team collaboration and to be driven by a larger purpose and contribute to the organization's success in the long run.
Other, please specify (Climate-change dedicated board member )	Monetary reward	Emissions reduction project Emissions reduction target Energy reduction project Energy reduction target Efficiency project Efficiency target Behavior change related indicator Environmental criteria included in purchases	Climate-related issues are integrated into our KPI structure for incentives. These are considered for short, medium- and long-term horizons. MTN actively acknowledges the need for a sustainable future and aims to align business strategy and growth to a sustainable growth framework. To future-proof MTN and capitalize on our move towards a digital-adopter mind set and flexi-workforce, we are shifting our thinking from traditional reward to creative reward employee sustainable engagement approaches. This will ensure that our reward offerings, practices and policies evolve, remain relevant and stay true to the business requirements. We continued our drive of enabling a high performance and rewarding culture at work. Our engagements with employees through various platforms on culture and reward matters, transformed many of our human capital metrics. Multiple interventions beyond the traditional performance management approach were implemented to ensure that each MTN personnel is driven by purpose and is aligned with the Group's Ambition 2025. Throughout the year, we encouraged employees to strive for team collaboration and to be driven by a larger purpose and contribute to the organization's success in the long run.
Other, please specify (Group Executive Corporate Affairs & Sustainability working alongside Executive: Network Design & Planning)	Monetary reward	Emissions reduction project Emissions reduction target Energy reduction project Energy reduction target Efficiency project Efficiency target Behavior change related indicator Environmental criteria included in purchases Company performance against a climate-related sustainability index	Climate-related issues are integrated into our KPI structure for incentives. These are considered for short, medium- and long-term horizons. MTN actively acknowledges the need for a sustainable future and aims to align business strategy and growth to a sustainable growth framework. To future-proof MTN and capitalize on our move towards a digital-adopter mind set and flexi-workforce, we are shifting our thinking from traditional reward to creative reward employee sustainable engagement approaches. This will ensure that our reward offerings, practices and policies evolve, remain relevant and stay true to the business requirements. We continued our drive of enabling a high performance and rewarding culture at work. Our engagements with employees through various platforms on culture and reward matters, transformed many of our human capital metrics. Multiple interventions beyond the traditional performance management approach were implemented to ensure that each MTN personnel is driven by purpose and is aligned with the Group's Ambition 2025. Throughout the year, we encouraged employees to strive for team collaboration and to be driven by a larger purpose and contribute to the organization's success in the long run.

## C2. Risks and opportunities

## C2.1

### (C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?

Yes

## C2.1a

### (C2.1a) How does your organization define short-, medium- and long-term time horizons?

	From (years)	To (years)	Comment
Short-term	0	3	Short term is defined as 0 to 3 years. This is also in line with our target setting process for short-, medium- and long-term targets.
Medium-term	3	5	Medium term is defined as 3 and 5 years. This is also in line with our target setting process for short-, medium- and long-term targets.
Long-term	5	10	Long-term is defined as 5 years to 10 years. This is also in line with our target setting process for short-, medium- and long-term targets.

## C2.1b

### (C2.1b) How does your organization define substantive financial or strategic impact on your business?

With regard to climate-related issues, substantive financial or strategic impact on the business is considered to be impacts that (1) affect MTN's ability to remain accountable to its shareholders for the long-term sustainability of the organization, (2) affect MTN's overall business growth and development, and (3) affect MTN's ability to oversee effective management of climate-related impacts.

The Group Sustainability & Corporate Affairs function, supported by the Group Risk, Technology and Supply Chain and operating markets, is responsible for identifying and managing climate change related risks using the Enterprise Risk Management (ERM) methodology at each MTN operation (OPCO). A key component of enterprise risk management (ERM) entails the use of a focused principal risk universe. The Risk Universe is in place at all levels of management. This includes the full gamut of strategic, financial and operational risks, both inherent to our industry and globally. In the first instance, the Risk Universe provides a two-tiered risk categorization that enables uniform mapping of risk issues across all OPCO's for bottom-up integration and consistency. From the top-down perspective, the principal Risk Universe guides management to achieve completeness of risk identification. The principal Risk Universe is dynamic and is periodically reviewed to reflect changes in strategy, organization and operations. The organization's risk appetite philosophy and statements are operationalized by applying risk preferences to each principal risk. This helps guide the articulation of mitigations and resource planning. Furthermore, key risk indicators (KRIs) with tolerance levels are developed for principal risks to further embed and operationalize the Board's risk appetite guidance. We use risk appetite and tolerance levels with business planning and decision, aligning with a continuously evolving business and to ensure that we are not exposed to risk levels beyond our defined risk preference levels while in pursuit of delivery of Ambition 2025. Our focus in 2022 will be to further mature our risk management capability.

To further help with Board and Management focus and enhance our capabilities to identify and manage risks, the Risk Universe is broken down to L1 – L4 risks. Level 1 - Higher Level categories that are largely static categories (strategic, financial, operational, technology, external, compliance); Level 2 - principal risks which are fixed for the short-medium, and undergo revision based on strategy revision or Board focus and prioritization; Level 3 - risk issues; Level 4 - process and functional. Risk management and assessment is an ongoing, continuous process. L2 Principal Risks are then classified as - High | Medium | Modest | Low. A risk is then assessed for having a substantive financial or strategic impact by assessing if the risk affects financial growth, customer growth, operating model, governance, people, technology and reputation.

At Group level, the structures include Group Board, Group Risk Management, Group Social, Ethics and Sustainability Committee, Group Executive Committee, this is complemented by Boards and sub-committees at a country level. Our governance of climate change-related issues is driven from the highest level within the Group through our appointment of Nkululeko Sowazi as a designated climate change Board member, responsible for climate change-related issues. His appointment further supports our continuous improvement and plans to mitigate climate change risk and be a leader in the sector regarding climate change management, mitigation and adaptation. In February 2022, MTN became a TCFD supporter indicating that they believe that the TCFD recommendations provide a useful framework to increase transparency on climate-related risks and opportunities. By publicly declaring support for the TCFD and its recommendations, MTN intends to demonstrate the actions it is taking to build a more resilient financial system through climate-related disclosure.

## C2.2

### (C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.

#### Value chain stage(s) covered

Direct operations

#### Risk management process

Integrated into multi-disciplinary company-wide risk management process

#### Frequency of assessment

More than once a year

#### Time horizon(s) covered

Short-term

Medium-term

Long-term

### Description of process

MTN takes an enterprise-wide approach to risk management which defines the processes and practices in place across MTN for management to proactively identify and manage risks and opportunities that impact strategic and operational objectives. MTN views risk management as a core competency by embedding a risk culture supported by top-down and bottom up processes, ensuring completeness, proportionality to our business and the robustness of mitigating actions. This results in a profile of the most material risk issues based on residual risk. Residual risk considers the likelihood of events occurring, the impact should these materialise and the effectiveness of existing mitigations and controls. This has been considered in our Net Zero by 2040 target which considers climate related risks and opportunities across all OPCOs whilst we have decided to play our part in reducing global carbon emissions in alignment to the Paris Agreement.

Additionally, each MTN OPCO is responsible for reporting, evaluating and monitoring risks and opportunities under the leadership of the MTN Group. The Group provides necessary resources to the OPCOs to assist with this process. This falls under the responsibility of the Social and Ethics Committee.

Each OPCO reports on its energy usage, energy efficiency initiatives, risks and opportunities, and changes to their operations on a monthly and annual basis. Information is provided to a third-party service provider who evaluates and validates the data and information and sends queries based on the information to each OPCO. It should also be noted that the Technology functions, often supported by Corporate Affairs Sustainability function, at each MTN operation are responsible for identifying and managing climate change related risks using the Enterprise Risk Management (ERM) methodology. ERM provides an approach to uniformly identify and evaluate potential events which may impact MTN's ability to achieve its objectives, in line with its strategy, risk appetite and risk preferences. The risk identification stage identifies risks, which could affect MTN's achievement of objectives and opportunities to enhance business performance. A common risk universe referred to as the Principal Risks, facilitates identification of risks that affect the MTN Group. Of the Principal Risks at Group level, climate change is covered under Principal Risk 20 (Continuity Risk) and Principal Risk 23 (Social and Environmental) due to its potential threat to continuity of operations; and the risk of not meeting stakeholder's social and environmental expectations.

The identified risks are prioritised based on a quantified probability and impact assessment, and response strategies developed based on the nature and materiality of the risk, and reported to the local operations' executive, audit and risk compliance committees as appropriate. The identification and mitigation processes of environmental, physical, financial and regulatory risks is managed or coordinated in conjunction with the risk owners by trained Energy and Carbon champions and other individuals within each country of operation.

The Group ensures that each country's operation actively manages physical, financial, and regulatory risks and impacts in a customised manner within local operating and environmental contexts by ensuring energy and carbon managers/ champions in technical functions. These champions are supported by finance, facilities, business risk management and corporate services team members.

The Group's sustainability & corporate affairs function undertakes the consolidation and reporting of each country's activities and results through monthly and quarterly energy and GHG footprinting, analysis and reporting, and through monthly overall risk and legal reports to their Group Business Risk Management functions. Group level environmental risks are incorporated into, Road to Zero (energy and carbon) reports, CDP reports, UN Global Compact Reports, and our annual Sustainability Report which is prepared with reference to the Global Reporting Initiative (GRI) Sustainability Reporting Standards; which are ultimately presented on an annual basis on the company's website. These are also presented to the Group Social and Ethics Committee on a scheduled basis and included in monthly reports to the Group Risk and Compliance function. Consolidated reports are consolidated and reviewed annually by the Group Executive for Corporate Affairs and Sustainability working alongside Group Technology. These reports are reviewed and approved by Group Executive Committee and Group Social, Ethics and Sustainability Committee for integration into MTN annual sustainability report.

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### Value chain stage(s) covered

Upstream

### Risk management process

Integrated into multi-disciplinary company-wide risk management process

### Frequency of assessment

Annually

### Time horizon(s) covered

Short-term

Medium-term

Long-term

### Description of process

MTN considers risks in the value chain and these risks are identified and managed in the same way described above for direct operations. Both Upstream and downstream categories are considered by MTN. A notable risk that has been identified by MTN to affect our upstream operations relates to the instability of electricity supply by grid suppliers in many countries in which our OPCOs operate which in turn affects operation of sites in those areas. Many of our OPCOs are now investigating alternative renewable energy sources to power their sites and this will be rolled out as part of our initiative programs to achieve Net Zero by 2040.

It should also be noted that MTN has improved our understanding of our value chain emissions in FY2021 by completing a comprehensive Scope 3 materiality screening. This assessment in turns aids in our ability to understand climate related risks in our value chain but understanding where the majority of our spend (Capex/ Opex) and emissions sit.

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### Value chain stage(s) covered

Downstream

### Risk management process

Integrated into multi-disciplinary company-wide risk management process

### Frequency of assessment

Annually

### Time horizon(s) covered

Short-term

Medium-term

Long-term

### Description of process

MTN considers risks in the value chain and these risks are identified and managed in the same way described above for direct operations. Both Upstream and downstream categories are considered by MTN. A notable risk that has been identified by MTN to affect our downstream operations relates to the risk of changing customer behavior and demands towards more sustainable products/ services. This aligns to our strategy towards our sustainable journey but also requires us to carefully manage any potential reputational risks. MTN focusses on maintaining and adhering to sustainable practices that help to address climate change risks appropriately. For example, MTN is actively considering the life cycles of our products and the end of life treatment in our emission footprinting. We also aim to engage more with customers regarding climate change and sustainability. It should also be noted that MTN has improved our understanding of our value chain emissions in FY2021 by completing a comprehensive Scope 3 materiality screening. This assessment in turns aids in our ability to understand climate related risks in our value chain but understanding where

the majority of our spend (capex/ Opex) and emissions sit.

C2.2a

(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?

	Relevance & Inclusion	Please explain
Current regulation	Relevant, always included	<p>This includes both current and emerging regulations that attempt to constrain actions that contribute to adverse effects of climate change or promote adaptation and mitigation to climate change.</p> <p>MTN ensure compliance and ongoing monitoring of regulatory developments for changes to existing or emerging climate-related regulations.</p> <ul style="list-style-type: none"> <li>• Preparing for taxes and regulatory requirements in financial planning processes.</li> <li>• Reducing GHG emissions through various initiatives in South Africa where a Carbon Tax Act was implemented effective 1 June 2019.</li> <li>• Nigeria's National Environmental Standards and Regulations Enforcement Agency is strategically working towards developing a framework for effective compliance and enforcement of flood control measures. Upcoming regulations in Nigeria might have an impact on our Nigerian operations and there is the expectation that Nigeria will also have a carbon tax in the coming years.</li> </ul> <p>Recent regulatory actions, for example, include:</p> <ol style="list-style-type: none"> <li>1. In 2017, the South African Department of Environment, Forestry and Fisheries (DEFF) introduced the National GHG Emission Reporting Regulations, which required the immediate attention and action of companies. Companies needed to register all facilities where activities exceed the thresholds of certain activities. MTN has been compliant with the process annually.</li> <li>2. DEFF published and gazetted the National Pollution Prevention (PPP) Regulations and MTN undertook an assessment of the implications of these regulations. We determined that the PPP regulations do not affect MTN at this stage.</li> <li>3. The South African government promulgated the carbon tax Act on 1 June 2019. MTN has been compliant with our carbon tax reporting and requirements since promulgation.</li> </ol> <p>This risk currently only affects MTN South Africa; however, MTN Zambia also reported increasing legislative activity with respect to carbon taxes. While MTN South Africa is one of the largest operations in the MTN Group, the financial impact of the current tax regime is estimated to range between R500 000 and R800 000 per annum, depending on applicable allowances, which is not currently considered material to the Group. We will continue to track and assess how emerging regulations relating to climate change/ energy/ carbon taxes will impact MTN in the coming years.</p>
Emerging regulation	Relevant, always included	<p>MTN sees continual and fast evolution in relation to climate change and energy/ technology regulations. Therefore, we consider understanding and assessing emerging regulation to be very important and relevant for our operations. We understand that preparedness helps us ensure sustainable growth of our services and operations which in turn secures our revenue and profit.</p> <p>An example of this is around regulations aimed at decreasing overall emissions into the atmosphere and utilizing cleaner and more energy efficient technologies. MTN has placed focus on improving its technology to be more innovative. This includes measures being put in place to reduce energy usage and source lower carbon energy supplies. MTN also looks at key energy market trends and emerging regulations in each region and how these will support the decarbonization of our network.</p>
Technology	Relevant, always included	<p>Being a company in the ICT sector, we consider technology to be very important and relevant to our growth and place specific focus on the way we can improve our technology across the Group. We are always looking for more innovative and sustainable ways of doing things. We are focused on solutions to enhance digital inclusion and transform societies. We firmly believe that technology and connectivity can accelerate transformative solutions to some of the world's complex challenges.</p> <p>For example, with the rapid growth in the Internet of Things (IoT) as well as increased connectivity (including 5G in future), we envisage increased demand in energy requirements to further support our delivery of services to customers. We regard this increased demand of energy to be a cost and climate change related risk regarding technology. We continually seek efficiencies in our network technologies, site construction and operations. We continually work to replace inefficient and old products with more efficient equipment and solutions whilst investing in renewable energy sources for sites owned and operated by MTN. We also engage with partners and suppliers on alternatives of enhancing the efficiency of our sites to help us meet our objective of increasing the use of renewable and low-carbon energy. Monitoring energy consumption on an ongoing basis and analyzing consumption trends in each operation also helps us to identify any problems that may drive sudden increases in reported consumption. To date, alternative energy and energy efficiency solutions have been implemented in more than 12 000 MTN-owned sites and in more than 6 000 leased sites.</p> <p>We are also working to improve our technology such as the introduction of the new genset technology, which offers uninterruptible power supply and DC power, we are working to ensure every operating company has explored new technology solutions for current genset lifecycle extension and new genset technology, install UPS system to compensate for variations in the input supply as any irregularities will affect the load and explore DC power systems to support inputs including multiple types of AC inputs and solar energy input. The system should give priority to solar energy when both grid and solar energy are available</p>
Legal	Relevant, sometimes included	<p>Our environmental management policy covers all significant risks and legal requirements across a broad range of environmental management categories, including our GHG emissions, waste, water, hazardous material management as well as targets and objective. The risks associated with climate-related litigation is considered to be relevant and always considered by MTN to ensure full compliance with legal requirements. While we have not formally identified these as part of our Group's climate-related risk assessments, we maintain awareness and understanding of the growing regulatory environment around climate change in various countries where we operate which could require us to comply with specific requirements, in order to leverage potential incentives and avoid penalties. As MTN, we continue to ensure that we respect existing legal requirements to mitigate risk of penalties.</p> <p>For example, by responding to South Africa's national GHG reporting regulations, we have mitigated the potential risk of financial penalties or imprisonment of officers for non-compliance with regulations.</p>
Market	Relevant, always included	<p>All OPCOs monitor how climate related risks and opportunities affect the markets in which our services are offered. Increasing general costs of (mainly fossil fuel-based) energy pose financial risks to us as a result of the use of grid power, gas and diesel. Some of these costs are due to national energy landscapes, while other costs are due to evolving international energy demand-supply dynamics and other macro issues. These impact MTN operations in various ways e.g., where national fuel subsidies may be removed, where electricity and fuel tariffs are increased or where tariffs may be raised for the upgrading of national energy supply infrastructure. Examples of such instances in our operations in the past few years include in Iran, Nigeria, Ghana, Benin and South Africa. Given the importance of energy and the contribution of energy costs to the overall operating cost of the Group, improving energy use and efficiency is a key component of the Company's overall cost-efficiency drive.</p>
Reputation	Relevant, always included	<p>There are growing stakeholder expectations of companies' contribution to the acceleration of climate action and good corporate governance in a manner that preserves and protects people's basic human rights have increased. MTN's investor community and other stakeholders are increasingly exerting pressure on the Group to demonstrate targets, performance and business plans for managing environmental, social and governance matters material to the business, including climate change management. MTN is listed in the JSE-FTSE4Good Emerging Markets series, and as a constituent, is required to demonstrate climate-related performance to maintain its reputation in the ESG investment sector. MTN conducts stakeholder reputation index survey on an annual basis to assess MTN's reputation on various matters including climate/ environmental reputation among our customers, employees, civil society and other stakeholder groups. MTN manages the associated risks and demonstrate environmental credentials that can meet the needs and expectations of our stakeholders in a manner that is aligned to organisational values.</p>

	Relevance & inclusion	Please explain
Acute physical	Relevant, always included	<p>Climate change effects including extreme weather events, higher rainfall and snowfall, higher temperatures and sea-level rise, which impacts infrastructure.</p> <p>MTN has risk management plans in place, these includes:</p> <ul style="list-style-type: none"> <li>• Preventive measures minimize physical risks in site selection (environmental surveys and impact assessments).</li> <li>• Exposure analysis and flood vulnerability risk assessments are conducted to determine planned sites/technical facilities' exposure to flooding.</li> <li>• Periodic tower integrity checks and regular and preventive maintenance including corrosion painting enhance infrastructural integrity and resilience.</li> <li>• Certain sites also have diesel generators and back-up power options if there are power outages.</li> </ul> <p>Extreme weather events such as floods and snow affect MTN operations. For example, in one of our Western Africa operations, a number of BTS (base transceiver station) sites and data centres were exposed to high intensity thunder and heavy rainfall. This resulted in an increase in CAPEX due to infrastructure degradation; loss of telephone, radio and internet services; service disruptions to domestic and emergency services as well as public services (e.g. traffic lights); and higher costs for the provision of telecommunications services. In another country, flooding of MTN facilities and base stations because of increase in rainfall and a surge in sea levels disrupted some operations.</p> <p>In the Middle East, abnormally high snow and ice covered some network sites significantly. Although affected sites remained operational, maintenance was challenging. In other areas of the region, significant flooding also affected the ability to access/ maintain some sites. The Group continually motivates all operations to identify and report on physical climate change related risks on a monthly basis through the carbon footprint reporting process and to ensure mitigation and business continuity plans through the Group's risk and compliance management processes</p>
Chronic physical	Relevant, always included	<p>Longer term shifts in climate patterns affect MTN operations. For example, in instances where climate projections indicate increased temperatures, this will most likely increase our power consumption for cooling BTS and Switches. For example, in several African and Middle Eastern countries where we operate and where the general environment is mostly arid and hot, climate change is likely to intensify the severity and duration of hot days annually. This would likely result in increased energy consumption for cooling purposes. Shifts in precipitation will also affect operations in countries where national grids rely on hydro-electric dams for power provision, including in some central and south-eastern African countries where we operate e.g., as drought conditions experienced a few years ago in Zambia demonstrated.</p>

## C2.3

### (C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes

## C2.3a

### (C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.

#### Identifier

Risk 1

#### Where in the value chain does the risk driver occur?

Direct operations

#### Risk type & Primary climate-related risk driver

Acute physical	Heavy precipitation (rain, hail, snow/ice)
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#### Primary potential financial impact

Increased indirect (operating) costs

#### Climate risk type mapped to traditional financial services industry risk classification

<Not Applicable>

#### Company-specific description

Extreme or high rainfall is a climate risk at several of our OPCO's, including Congo Brazzaville, Dubai, Ghana, Liberia, South Africa, Uganda, and Zambia. High rainfall leads to infrastructure malfunction and degradation, flooding of buildings and data centres, travel and logistics issues, and health and safety risk.

#### Time horizon

Short-term

#### Likelihood

Very likely

#### Magnitude of impact

Medium-high

#### Are you able to provide a potential financial impact figure?

No, we do not have this figure

#### Potential financial impact figure (currency)

<Not Applicable>

#### Potential financial impact figure – minimum (currency)

<Not Applicable>

#### Potential financial impact figure – maximum (currency)

<Not Applicable>

#### Explanation of financial impact figure

NA

#### Cost of response to risk

#### Description of response and explanation of cost calculation

MTN is focussed on reducing its overall risk caused by high rainfall by utilizing appropriate construction to prevent flooding risk and destruction; regular cleaning of dust and

debris on solar panels to allow sun rays to be collected; regular maintenance and cleaning schedules, and flood pumps.

**Comment**

**Identifier**

Risk 2

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Current regulation	Carbon pricing mechanisms
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**Primary potential financial impact**

Decreased access to capital

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

Carbon pricing uncertainty in the international carbon market is regarded as a regulatory climate change risk to MTN, but also poses potential financial opportunity as most countries in which we operate are classified as emerging countries, and some also hold Least Developed Country status.

MTN South Africa is currently evaluating the value of trading verified certified emission reduction (CER) credits from some of its installations. However, the generation of UNFCCC Clean Development Mechanism (CDM) credits in MTN is not a priority given the status of international pricing, and the value of MTN's saved or avoided emissions in mitigating MTN South Africa's carbon taxes liability or leveraging other national tax benefits.

It is expected that MTN Uganda is likely to also face Carbon Tax implications in the next few years which will likely affect the OPCO's overall revenue and increase costs.

**Time horizon**

Short-term

**Likelihood**

Very likely

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

500000

**Potential financial impact figure – maximum (currency)**

800000

**Explanation of financial impact figure**

The financial figure range estimated is based on MTN SA's total stationary energy combustion and the relevant carbon tax per tonnage pricing in South Africa. The range is based the possible and applicable allowances SA can attain.

**Cost of response to risk**

**Description of response and explanation of cost calculation**

The cost calculation used is as per the formula used in MTN's actual carbon tax estimate year on year since 2019. We follow the methodology outlines in the South African Carbon Tax Act and take into account any applicable and relevant allowances. The calculation only takes into account stationary energy consumption in our South African operations.

**Comment**

**Identifier**

Risk 3

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Chronic physical	Changing precipitation patterns and types (rain, hail, snow/ice)
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**Primary potential financial impact**

Increased direct costs

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

Climate change effects including extreme weather events, higher rainfall and snowfall, higher temperatures and sea-level rise, which impacts infrastructure. For example, in one of our Western Africa operations (OPCOs), a number of BTS sites and data centres were exposed to high intensity thunder and heavy rainfall. This resulted in an increase in CAPEX due to infrastructure degradation; loss of telephone, radio and internet services; service disruptions to domestic and emergency services as well as public services (e.g. traffic lights); and higher costs for the provision of telecommunications services. In another country, flooding of MTN facilities and base stations as a result of increase in rainfall and a surge in sea levels disrupted some operations. In the Middle East, abnormally high snow and ice covered some network sites

significantly. Although affected sites remained operational, maintenance was challenging. In other areas of the region, significant flooding also affected the ability to access/maintain some sites. The Group continually motivates all operations to identify and report on physical climate change related risks on a monthly basis through the carbon footprint reporting process and to ensure mitigation and business continuity plans through the Group's risk and compliance management processes. Longer term shifts in climate patterns affects MTN operations. For example, in instances where climate projections indicate increased temperatures, this will most likely increase our power consumption for cooling BTS and Switches. For example, in a number of the African and Middle Eastern countries where we operate and where the general environment is mostly arid and hot, climate change is likely to intensify the severity and duration of hot days annually. This would likely result in increased energy consumption for cooling purposes. Shifts in precipitation will also affect operations in countries where national grids rely on hydro-electric dams for power provision, including in some central and south-eastern African countries where we operate e.g. as drought conditions experienced a few years ago in Zambia

**Time horizon**

Medium-term

**Likelihood**

Virtually certain

**Magnitude of impact**

Medium

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

1000000

**Potential financial impact figure – maximum (currency)**

10000000

**Explanation of financial impact figure**

Changes in precipitation patterns and extreme variability in weather patterns affect MTN financially in terms of incorporating mitigation and adaptation measures. Often extreme weather conditions cause server damage to sites and require capital investment to fix. Flooding risks and the impact to equipment and service delivery requires flood management and control and backup for critical sites.

**Cost of response to risk**

15000000

**Description of response and explanation of cost calculation**

Operating equipment, such as generators, have been raised above the flood level in some MTN countries/regions most at risk. In addition, future site planning has adopted the lessons learned about defending against floods.

**Comment**

MTN's infrastructure plan includes ensuring redundancy and backup. If a single base station site is unavailable, traffic is switched to an alternative site. If a few sites are unavailable, the situation is classified as an Incident. Catastrophic incidents will trigger business continuity processes. One of the main elements of network performance is the availability of power. We deploy a range of solutions to primary power sources, including battery back-ups and diesel generators. Our main element of availability is power, and we maintain autonomy via battery backup solutions and direct power generation. If there is an issue related to transmission, we re-route network traffic where applicable. Network traffic may be routed to other operational sites. In rural areas or areas with low volumes of network traffic, sites may be non-operational from a few minutes to a few hours and worst case of unavailable for less than 24 hours. It is not possible to estimate the cost of this risk.

**Identifier**

Risk 4

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Technology	Transitioning to lower emissions technology
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**Primary potential financial impact**

Increased capital expenditures

**Climate risk type mapped to traditional financial services industry risk classification**

<Not Applicable>

**Company-specific description**

Many of our OPCO's, including South Africa and Nigeria will be facing the risk of increased capital expenditure over the next few years, as we transit into a lower emission technology network and operation. The costs associated with green/ low carbon infrastructure and equipment require substantial investment.

**Time horizon**

Medium-term

**Likelihood**

Virtually certain

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

**Cost of response to risk**

**Description of response and explanation of cost calculation**

**Comment**

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## C2.4

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**(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes

### C2.4a

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**(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.**

**Identifier**

Opp1

**Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Energy source

**Primary climate-related opportunity driver**

Use of lower-emission sources of energy

**Primary potential financial impact**

Reduced direct costs

**Company-specific description**

MTN has committed to Net Zero by 2040 across all its OPCO's. As such, there is an opportunity for MTN to consider using renewable energy sources, such as solar, wind or hydro power. This will require capital investments, but reduce longer-term operating costs and exposure to fuel price fluctuations.

**Time horizon**

Short-term

**Likelihood**

Virtually certain

**Magnitude of impact**

High

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

**Cost to realize opportunity**

**Strategy to realize opportunity and explanation of cost calculation**

**Comment**

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**Identifier**

Opp2

**Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Resource efficiency

**Primary climate-related opportunity driver**

Move to more efficient buildings

**Primary potential financial impact**

Returns on investment in low-emission technology

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**Company-specific description**

There are several tax incentives, research and development incentives and government grants in the area of energy and climate change that could benefit MTN. These are mainly available in South Africa, but may become available in other MTN countries of operation. South African incentives being explored by MTN include: Income Tax Act, Section 12.K: Carbon credits generated by Clean Development Mechanism projects will be exempt from normal tax. Section 12.L: An income tax allowance is available for energy efficiency savings.

The 12L tax rebate is an incentive for increased energy efficiency, available in the form of an allowance/deduction allowed from taxable income based on demonstrable energy efficiency savings created through the implementation of energy efficiency measures. The tax incentive is available for savings in all energy forms and not only electricity. The rebate is equivalent to 95 cents per kilowatt hour or kilowatt hour equivalent of energy saved. In addition, because MTN South Africa can earn carbon credits from the CDM project there is the potential for tax related savings. MTN South Africa participated in the Private Sector Energy Efficiency (PSEE) programme and has reviewed its energy policy identifying further opportunities for energy efficiency investments, and assessing the financial penalties and incentives available from local regulatory authorities for energy efficiency investments. In addition, there are growing pressures within other regions to comply with environmental legislation.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

1000000

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

The figure was calculated by looking at the total energy saving by MTN South Africa and the applicable tax rebate to estimate the savings based on the baseline year.

MTN is currently saving approximately 18 000 MWh of electricity per year in South Africa from energy efficiency and low carbon energy initiatives. Using a tax incentive rate of R0.95, these energy savings could have translated into MTN paying over R5.5 million less tax for FY20.

This cost estimation has also assumed that all projects would have qualified, and all savings were generated in a single year which is not necessarily the case. MTN is currently in the process of applying for a rebate and this could result in a potential saving for MTN annually, excluding the cost required for measurement and verification.

**Cost to realize opportunity**

500000

**Strategy to realize opportunity and explanation of cost calculation**

Because energy consumption and the management thereof is important, tax incentives, research and development incentives and government grants will be looked into in order to aid the occurrence of energy efficiency measures at MTN South Africa. MTN South Africa is in the process of securing benefits for energy efficiency investments under Section 12L of the Income Tax Act. MTN proactively engages with regulators in its different operating countries which puts the company in a position to take advantage of any regulatory opportunities that may develop. For example, in Sudan, MTN is the only company within the telecommunications sector that is part of the Supreme Committee for Environmental Affairs.

MTN is currently working towards confirming its 12L savings with an accredited inspection body to realise their savings and claim the rebate. The costs of managing this risk relate to the costs associated with an external consultant that manages all carbon and energy related services, as well as the costs involved for the procurement of a Monitoring and Verification (M&V) accredited body.

**Comment**

The costs of managing this risk relate to the costs associated with an external consultant that manages all carbon and energy related services, as well as the costs involved for the procurement of an M&V accredited body.

**Identifier**

Opp3

**Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Development and/or expansion of low emission goods and services

**Primary potential financial impact**

Reduced direct costs

**Company-specific description**

Regulations are affecting the cost of energy for customers. The Internet of Things (IoT), including smart devices, Machine-to-Machine (M2M) and cloud-based solutions, enables a wide range of industries to connect networked devices that exchange information, perform actions and respond intelligently to the environments without direct human intervention. This transforms devices into intelligent assets offering a range of possibilities to improve business efficiency, performance, effectiveness, accuracy, and provide other economic benefits. Demand for ICT solutions offered by MTN that enable clients to reduce their energy consumption/ GHG emissions is likely to increase. This could include contributions to smart systems (smart grids, smart transport, smart logistics etc.) or 'smart working' (working remotely). For example, we offer fleet management solutions in several countries, ensuring efficient use of assets and fuel for vehicles. In South Africa, we have trialled smart refrigerator management solutions and low-power wide area networks and narrow band IoT technologies to facilitate the IoT solutions we offer in an energy-efficient manner.

Against the backdrop of energy poverty and the cost of accessing digital services in many of our operating countries, MTN has partnered with lease-to-own solar product manufacturers to offer affordable, environmentally responsible and safe solutions that enable people to keep their phones and other electronic devices charged and

connected to digital services.

We first launched this solution in Uganda in 2014, and it is now available in five markets, with plans to launch in more countries in FY2022. We estimate that we have positively impacted around 2, 3 million lives, from children who are able to study for longer hours at night to small businesses able to extend their trading hours and offer MTN Mobile Money services.

**Time horizon**

Medium-term

**Likelihood**

Virtually certain

**Magnitude of impact**

Low

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

The Group has not quantified the financial impact of this, due to the significant variances in this opportunity element across our 21 countries of operation. The Global System Mobile Association (GSMA) has forecasted that the Internet of Things (IoT) has estimated that by 2025 there will be 3.5 billion cellular IoT connections, including 1.9 billion licensed LPWA connections market will be worth \$ 1, 1 trillion by 2025.

**Cost to realize opportunity**

**Strategy to realize opportunity and explanation of cost calculation**

Internet of Things (IoT) market is estimated to grow to an installed base of 75.4 billion devices in 2025, and that by 2022 annual revenues could exceed \$470 billion for the IoT vendors selling the hardware, software and comprehensive solutions. We launched our IoT platform in 2015. This enables us to offer services to a wide range of industries, connecting an otherwise fragmented population of devices and systems through an open platform that enables networked devices to exchange information and perform actions, responding intelligently to their environments without human intervention. Our Machine2Machine (M2M) solutions include enterprise mobility management platforms, fleet and private vehicle management and asset tracking, fuel and utilities management, and security solutions, among others. As an ICT operator, we are aware of the role we can fulfill in assisting our customers to reduce the number of physical materials and businesses. Our key focus area was to develop a clear vision for MTN's future participation in IoT and articulate a cohesive strategy to achieve this vision. Our key priorities were to implement a proof of concept solution, develop knowledge in predictive analytics, and show customers that we can realise IoT use cases and to translate these to their specific contexts. We also began to look for key partners to work with across the value chain and across various markets.

**Comment**

Isolating the component of the investment in innovative products that relate specifically to climate change drivers is not feasible at this stage and therefore the cost of this opportunity is included our operating costs which we reported in our Annual Financial Statements.

It's not possible to estimate the cost of this opportunity.

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**Identifier**

Opp4

**Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Energy source

**Primary climate-related opportunity driver**

Use of new technologies

**Primary potential financial impact**

Other, please specify (Reputational benefits resulting in increased demand for goods/services)

**Company-specific description**

Technologies such as artificial intelligence and the Internet of Things (IoT) are changing industrial and economic ecosystems. As the digital economy evolves, these opportunities are also forcing new ways of thinking around how spaces, resources and assets are used efficiently. The ability to improve resource efficiency in a climate stressed world can be enabled using smart devices. MTN can develop innovative products using mobile wireless systems, sensors etc. that can provide customers with access to information that could reduce costs/ losses and contribute towards greater resilience in the face of changing climatic conditions. These could include up-to-date information on weather and access to the latest planting/growing/ harvesting information for farmers; early warning systems for communities; Group communication platforms in times of disasters, resource monitoring programmes. We are actively developing new products and partners with value —add service providers to address the requirement for climate-centric ICT solutions. Our IoT solutions include enterprise mobility management platforms, vehicle management and asset tracking, fuel and utilities management, connectivity, and security solutions. MTN is particularly concerned about resources such as water, energy, food, biodiversity and wildlife, among others. We operate in emerging markets where the need to adapt to changing environmental conditions, coupled with the lowest levels of financial and other resources, is becoming increasingly evident. We are, therefore, well placed to offer products that support resilience in the face of these challenges, while representing commercial opportunities for us. Our key focus area was to develop a clear vision for MTN's future participation in IoT and articulate a cohesive strategy to achieve this vision. Our key priorities were to implement a proof of concept solution, develop knowledge in predictive analytics, and show customers that we can realise IoT use cases and to translate these to their specific contexts. We also began to look for key partners to work with across the value chain and across various markets. We implemented small-scale projects in several countries to address issues such as water, energy and livestock and wildlife management

**Time horizon**

Medium-term

**Likelihood**

About as likely as not

**Magnitude of impact**

Unknown

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

The Group has not quantified the financial impact of this, due to the significant variances in this opportunity element across our 20 countries of operation

**Cost to realize opportunity****Strategy to realize opportunity and explanation of cost calculation**

MTN explored opportunities: agricultural solutions, animal tracking, anti-poaching initiatives and health solutions. SmartCom in Ghana combines a video camera and a security system in one, ensuring real-time alerts and live monitoring to mobiles devices. Vehicle tracking location solutions in Uganda and Cameroon, fleet monitoring solutions in Uganda, Benin, Zambia and Ivory Coast, and plan to extend to Botswana, Ghana, Namibia, Swaziland and Zambia. A smart water-metering proof of concept service in South Africa, enables automated gathering of utility meter data -customers monitor water consumption, improve consumption efficiency and identify water pipeline leakages. A smart energy metering solution in South Africa and Cameroon monitors energy consumption and potentially reduces indirect (GHG) emissions. In Nigeria, a solar-powered GPS-enabled solution defines geo-fenced areas for grazing - possible disease outbreaks can be contained and human conflicts reduced. To note that over the past few years, MTN South Africa developed a dam and tank level monitoring solution, and continued trialing wildlife tracking through geo-fencing of animals. Also, a vehicle asset tracking was launched using GPS to control fleets remotely, ensure services such as dispatch management, driver behavior, axle load, fuel consumption, temperature management, repair and project scheduling, and efficient fuel utilization.

**Comment**

Isolating the component of the investment in innovative products that relate specifically to climate change drivers is not feasible at this stage and therefore the cost of this opportunity is included our operating costs which we reported in our Annual Financial Statements.

It is not possible to estimate the cost of this opportunity.

### C3. Business Strategy

#### C3.1

**(C3.1) Does your organization's strategy include a transition plan that aligns with a 1.5°C world?**

**Row 1**

**Transition plan**

Yes, we have a transition plan which aligns with a 1.5°C world

**Publicly available transition plan**

No

**Mechanism by which feedback is collected from shareholders on your transition plan**

Our transition plan is voted on at Annual General Meetings (AGMs)

**Description of feedback mechanism**

<Not Applicable>

**Frequency of feedback collection**

<Not Applicable>

**Attach any relevant documents which detail your transition plan (optional)**

MTN Integrated Annual Report and Sustainability Report

2021-MTN-Group-Integrated-Annual-Report.pdf

2021\_MTN\_Sustainability Report.pdf

**Explain why your organization does not have a transition plan that aligns with a 1.5°C world and any plans to develop one in the future**

<Not Applicable>

**Explain why climate-related risks and opportunities have not influenced your strategy**

<Not Applicable>

#### C3.2

**(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?**

	Use of climate-related scenario analysis to inform strategy	Primary reason why your organization does not use climate-related scenario analysis to inform its strategy	Explain why your organization does not use climate-related scenario analysis to inform its strategy and any plans to use it in the future
Row 1	No, but we anticipate using qualitative and/or quantitative analysis in the next two years	Other, please specify (We plan to have the climate related scenarios in place within the next 24 months)	<p>While we do currently integrate climate change management issues into MTN's business strategy through our product development and innovation processes, and through our risk management processes, we do not yet apply climate-related scenarios in these processes. We are also committed to aligning with the TCFD recommendations, which recommend scenario analysis. To this end, we conducted a gap analysis against the TCFD recommendations. Following the gap analysis, we identified areas for improvement to further align with the recommendations. We will be publishing our first TCFD report in 2022.</p> <p>Looking forward, MTN will incorporate climate-related scenario analysis to inform its strategy and transition to Net Zero. Mitigation strategies will be integrated in our medium- and long-term strategy plans.</p> <p>Over the last few years, we have developed several solutions that can help our communities mitigate impacts of climate change, given the lack of affordable, reliable and low-carbon energy access in our market, and the impact of climate change in Africa especially. These include prepaid solar powered energy solutions for domestic and Small, Medium and Micro-Enterprises (SMME) market use, energy and water metering and monitoring Internet of Things (IoT) solutions, solutions for wildlife and livestock tracking and others.</p> <p>Additionally, MTN Group monitors the energy use associated with its operations and calculates its monthly and annual GHG emissions. MTN also works towards reducing emissions through implementing energy efficiency initiatives and deploying renewable energy technologies. The responsibility for all climate change and sustainability initiatives and issues at MTN Group lies with the Social, Ethics and Sustainability Committee and the Chairman of the committee. The MTN board, does however, have overall oversight on all climate related matters. . The Group Sustainability function compiles and monitors reports for monthly executive committee reports, monthly risk reports, quarterly Social and Ethics Committee presentations and annual sustainability and integrated reports. This includes climate change related issues which include energy consumption, climate risks and opportunities, as well as alternative energy and energy efficiency initiatives. MTN has also committed to Net Zero by 2040 and is in the process of aligning its targets and emission reduction plan.</p>

**C3.3**

**(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	<p>Digitization can enable a transition to a low-carbon economy. We are working to increase the roll out of infrastructure that will enable the uptake of the Internet of Things Solutions (IoT) by industries and enterprises across our operations in Africa and the Middle East. The IoT enables machines and infrastructure to be monitored and operated remotely. This technology can radically transform both large and small enterprises in terms of efficiencies, distribution and even business models. IoT, including smart devices, machine to machine (M2M) and cloud-based solutions enable a wide range of industries to connect networked devices that exchange information, perform actions and respond intelligently to their environments without direct human intervention. We are also piloting Narrow Band-IoT (NB-IoT) technologies, a new solution that extends the utilization of IoT by making it more efficient to connect objects that require a long battery life and that are in areas where network signals may have difficulty penetrating. MTN, in partnership with a vendor management AI tool, embarked on a site optimization platform proof of concept in 2020. The platform aims to reduce costs, ensure resilience and reduce MTN's carbon footprint. The vendor management platform first identifies built-in problems on each site upon installation. On a day-to-day basis the platform uses AI to optimise power usage of each tower site by monitoring the real-time status of site components including grid availability, battery life, and solar availability and generator fuel levels.</p>
Supply chain and/or value chain	Yes	<p>Most of our emissions are not direct emissions from MTN-owned or MTN-controlled sources, approximately 15% of our emissions were from Scope 2 and nearly 80% of our emissions being Scope 3 emissions therefore MTN called on all their suppliers to set a science-based GHG-reduction target for their organisations and publicly communicate their commitment, report progress on reducing GHG emissions using the CDP system and share emissions data, at product and service level, embed GHG emission reduction at both product development and service delivery level, ensure their suppliers are aware of this call to action so that it can then be cascaded through their supply chain, actively building the capacity of local suppliers in the process and support the Eco Rating of each device and actively support our activities to provide life cycle product services to customers including trade-ins and recycling option. . MTN has worked with various governmental departments, corporate and other organisations to raise awareness, facilitate collection and improve e-waste management practices among handlers, albeit on a very small scale. Our partnerships focus on improving the volumes of waste collected both within our own operations and from the public. We also try to ensure that e-waste is diverted to responsible handlers who either extract valuable components or dispose of it in accordance with standards such as ISO 14001:2015, ISO 18001 or SERI.</p> <p>MTN has also Implemented a supply chain resilience programme to review the impact of unpredictable events (such as COVID-19, Suez Canal blockage, semiconductor crisis). Defined pre-emptive actions on upstream supply chain, freight and commodities to minimise the impact on operations.</p> <ul style="list-style-type: none"> <li>• Developed risk models and monitoring systems to support the supply chain resilience programme.</li> <li>• Revised the terms of the Supplier Code of Conduct to cover aspects related to anti-money laundering, sanctions, trade compliance and anti-competitive practices.</li> <li>• Strengthened the supplier on boarding process with addition of an information security section covering data breaches and privacy.</li> <li>• ESG site audits are conducted under JAC, which represents more than 50% of the industry revenue</li> <li>• Integrated control tower platform with order management systems of suppliers to monitor shipments in real time and intervene based on proactive alerts.</li> </ul>
Investment in R&D	Yes	<p>Through our partnerships, we have explored opportunities which include our rapid rural roll-out programme (R3). R3 focuses on providing voice and data services to previously uncovered areas reaching the most vulnerable, marginalised and underserved members of society. Extending coverage in these areas supports social and economic transformation and represents shared value creation. We accelerated our R3 programme with 497 solar powered sites in nine countries in partnership with various vendors. Through various partnerships, MTN Iran cell has launched a pilot project using Narrowband (NB IoT) technology to offer smart parking solutions in Mashhad city in order to overcome the shortage of parking. NB-IoT smart parking solutions use magnetic parking sensors to detect the availability of parking spaces and use the NB-IoT network to synchronise a parking lot's status with an application server. Drivers are then able to search for available parking bays through an application resulting in a significant saving of time and frustration for the driver while reducing traffic congestion and air pollution/ emissions in the broader community.</p>
Operations	Yes	<p>Climate change could disrupt our operations, including both transition risks and physical risks. The transition from fossil fuels to renewable energy technologies will require changes to our operations and new contract agreements. This could impact the prices of our products and services, including voice, data and digital services, as the price of energy changes. Physical risks such as increased flooding and increased temperatures could affect our core infrastructure, such as base stations, which are critical to delivering our uninterrupted services. MTN has had to rely on diesel backup generators during heavy rainfall and flooding events. This will likely increase in the future. In some countries, where we operate and where the main electricity supply is from hydro-powered grids, drought conditions have increased energy costs and increased energy insecurity over the past few years. Opportunities are available such as the use of solar energy to power our sites in rural areas where grid electricity is not easily accessible though our R3 programme which provides voice and data services to previously uncovered areas.</p>

**C3.4**

**(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.**

	Financial planning elements that have been influenced	Description of influence
Row 1	Revenues Direct costs Capital expenditures Capital allocation Acquisitions and divestments Access to capital Assets Liabilities	<p>The revenue from identified climate change risks and opportunities is not quantified separately from the total Group Revenue. Some of the environmental and climate-related commercial solutions that we offer generate revenue for MTN, for example vehicle and asset tracking, livestock and wildlife tracking and connected devices for water and energy management. These solutions are offered in several MTN countries including South Africa, Nigeria, Benin, Cameroon, Ghana, Iran and others. Revenue is also earned from prepaid solar-powered charging devices for homes, small businesses and entrepreneurs in several countries including Uganda, Zambia, Nigeria and Cote d'Ivoire.</p> <p>To reduce our greenhouse gas emissions, reduce operating costs, mitigate and adapt to the negative impacts of climate change on our physical, financial and regulatory risk profiles, we have continued to modernise our existing network, and ensure that our new infrastructure investments are energy-efficient and make use of alternative energy solutions to be more resilient. Some of our most critical infrastructure such as base stations, data centres, switches and hubs are susceptible to physical climate change risks. We have continued to modernise our existing network, ensured backup sites for business continuity, and ensured that our new infrastructure investments are energy-efficient and make use of alternative energy solutions wherever possible to be more resilient. In our capital expenditures, we encourage our operations to investigate alternative energy and energy efficiency solutions that would provide a good return on investment.</p> <p>Although climate change risks and opportunities associated with acquisitions and divestments may exist within our value chain, we have not formally factored these within our financial planning processes. We engage with tower management companies and equipment manufacturers and suppliers on ways of working together to enhance the efficiency of our sites and help us meet our objective of increasing the use of renewable and low-carbon energy. However, it should also be noted that our improved ESG position and commitment to align to TCFD recommendations and GNI principals improves also our access to capital and we will be considering opportunities to access green bonds and sustainable finance as part of the Net Zero commitment. Some of our most critical assets include infrastructure such as base stations, data centres, switches and hubs which are susceptible to physical climate change risks. These include physical risks such as increased flooding and increased temperatures. As part of our value chain climate change risk assessment process which is being developed, our operations may be required to improve their maintenance budget and capital expenditure plans to ensure that critical infrastructure does not fail should climate related risks emanate.</p> <p>Although climate change risks and opportunities associated with liabilities may exist within our value chain, we have not formally factored these within our financial planning processes.</p>

**C3.5**

**(C3.5) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's transition to a 1.5°C world?**

No, but we plan to in the next two years

**C4. Targets and performance**

**C4.1**

**(C4.1) Did you have an emissions target that was active in the reporting year?**

Absolute target

**C4.1a**

**(C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.**

**Target reference number**

Abs 1

**Year target was set**

2021

**Target coverage**

Company-wide

**Scope(s)**

Scope 1

Scope 2

Scope 3

**Scope 2 accounting method**

Market-based

**Scope 3 category(ies)**

Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

**Base year**

2021

**Base year Scope 1 emissions covered by target (metric tons CO2e)**

308803.57

**Base year Scope 2 emissions covered by target (metric tons CO2e)**

658328.7

**Base year Scope 3 emissions covered by target (metric tons CO2e)**

215205.56

**Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

1182337.84

**Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1**

100

**Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

100

**Base year Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

5.31

**Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

24

**Target year**

2040

**Targeted reduction from base year (%)**

100

**Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]**

0

**Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

308803.57

**Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

658328.7

**Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

215205.56

**Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

1182337.84

**% of target achieved relative to base year [auto-calculated]**

0

**Target status in reporting year**

New

**Is this a science-based target?**

Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

**Target ambition**

1.5°C aligned

**Please explain target coverage and identify any exclusions**

Absolute targets reduction in emissions by 2040. This is a Net Zero target and covers 100% of Scope 1, 2, and Scope 3 Category 3. A supplier engagement target has also been set for 80% of MTN's top spend under Scope 3

**Plan for achieving target, and progress made to the end of the reporting year**

Our target for 2021 was to re-baseline and set our Net Zero targets. We intend to submit our targets for validation with the SBTi in 2022 (this year). In order to reach our targets, MTN has put in place plan to reach its targets by 2040, This is through the Project Zero portfolio which aims to roll our energy efficiency projects and initiative to all OPCO's The project also tracks emissions on a monthly basis to ensure that targets are being monitored constantly

**List the emissions reduction initiatives which contributed most to achieving this target**

<Not Applicable>

---

## C4.2

**(C4.2) Did you have any other climate-related targets that were active in the reporting year?**

Net-zero target(s)

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## C4.2c

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**(C4.2c) Provide details of your net-zero target(s).**

**Target reference number**

NZ1

**Target coverage**

Company-wide

**Absolute/intensity emission target(s) linked to this net-zero target**

Abs1

**Target year for achieving net zero**

2040

**Is this a science-based target?**

Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next 2 years

**Please explain target coverage and identify any exclusions**

Scope 1, 2 and 3 will be covered. Scope 1, 2, 3 (category 3) are an absolute emission reduction by 2040. Scope 3 (Categories 1 and 2) are supplier engagement targets

**Do you intend to neutralize any unabated emissions with permanent carbon removals at the target year?**

Unsure

**Planned milestones and/or near-term investments for neutralization at target year**

<Not Applicable>

**Planned actions to mitigate emissions beyond your value chain (optional)**

Not applicable

**C4.3**

**(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

Yes

**C4.3a**

**(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.**

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	20	
To be implemented*	45	
Implementation commenced*		
Implemented*	23	
Not to be implemented		

**C4.3b**

**(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.**

**Initiative category & Initiative type**

Low-carbon energy generation	Solar heating and cooling
------------------------------	---------------------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

**Investment required (unit currency – as specified in C0.4)**

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

Ongoing

**Comment**

MTN SA - Concentrated solar power plant used to supplement HVAC for chilled water

**Initiative category & Initiative type**

Low-carbon energy generation	Other, please specify (Trigeneration using natural gas)
------------------------------	---

**Estimated annual CO2e savings (metric tonnes CO2e)**

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

**Investment required (unit currency – as specified in C0.4)**

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

Ongoing

**Comment**

MTN SA - Trigeneration using natural gas to supplement grid usage at facility

**Initiative category & Initiative type**

Low-carbon energy generation	Other, please specify (Deep cycle batteries)
------------------------------	--

**Estimated annual CO2e savings (metric tonnes CO2e)**

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

**Investment required (unit currency – as specified in C0.4)**

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

Ongoing

**Comment**

MTN Nigeria - Deployment batteries to provide higher battery autonomy at BTS sites

**Initiative category & Initiative type**

Energy efficiency in buildings	Other, please specify (Site fuel management)
--------------------------------	--

**Estimated annual CO2e savings (metric tonnes CO2e)**

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

**Investment required (unit currency – as specified in C0.4)**

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

Ongoing

**Comment**

MTN Nigeria - The Peak & Off-Peak solution is an initiative to reduce energy utilization during the off-peak (non-working or lesser working hours), and consequently reduces the cost on energy. Bigger capacity gen sets are used during the normal working hours (Peak period) while smaller capacity ones are used during non-working hours: Nights and weekends.

**Initiative category & Initiative type**

Energy efficiency in buildings	Building Energy Management Systems (BEMS)
--------------------------------	---

**Estimated annual CO2e savings (metric tonnes CO2e)**

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

**Investment required (unit currency – as specified in C0.4)**

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

Ongoing

**Comment**

MTN Ghana - Energy Management Tool (EMT) at Switches/Data centres. Comprises of installation, Commissioning and integration of products via GUI with reporting and Remote-control functionality.

**Initiative category & Initiative type**

Low-carbon energy generation	Solar PV
------------------------------	----------

**Estimated annual CO2e savings (metric tonnes CO2e)**

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

**Investment required (unit currency – as specified in C0.4)**

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

Ongoing

**Comment**

PV Solar systems to generate an average 6KW of power for Cell sites

**Initiative category & Initiative type**

Energy efficiency in buildings	Heating, Ventilation and Air Conditioning (HVAC)
--------------------------------	--

**Estimated annual CO2e savings (metric tonnes CO2e)**

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

**Investment required (unit currency – as specified in C0.4)**

**Payback period**

1-3 years

**Estimated lifetime of the initiative**

Ongoing

**Comment**

MTN Group will be looking to ways to reduce our overall energy consumption as a priority in the coming years. This is in line with our Net Zero target and project roll out. We will be updating HVAC systems and utilize air economisers are several of our OPCO's. We will also be replacing old AC's with newer, more efficient AC's and roll out ambient temperature control systems.

C4.3c

**(C4.3c) What methods do you use to drive investment in emissions reduction activities?**

Method	Comment
Dedicated budget for energy efficiency	To reduce emissions, save operating costs, and mitigate the impact of climate change on physical, financial and regulatory risk profiles, MTN has continued to improve the existing network, and to ensure that new infrastructure investments are energy and emissions efficient, as well as more resilient. These improvements fall in line with the strategies of Project Zero and Project Infinity.
Lower return on investment (ROI) specification	As part of business case development, MTN determines the breakeven point and return on investment period. This applies to all projects, including energy and carbon reduction projects, which must meet internal return on investment criteria
Employee engagement	MTN strives to ensure that its employees are actively engaged and educated in energy and environmental management through workshops and educational outreach. Throughout our footprint, we also ensure operating companies remain compliant with applicable national laws and environmental regulations. MTN understands that employee awareness and support are critical to ensuring individual actions to conserve and manage resources result in meaningful outcomes. This drives investment to roll out appropriate education and training of employees to ensure that climate change is prioritised across the group and at all levels
Dedicated budget for other emissions reduction activities	To reduce emissions, save operating costs, and mitigate the impact of climate change on physical, financial and regulatory risk profiles, MTN has continued to improve the existing network, and to ensure that new infrastructure investments are energy and emissions efficient, as well as more resilient. These improvements fall in line with the strategies of Project Zero and Project Infinity.
Internal incentives/recognition programs	With MTN aiming for Net Zero by 2040, we have put in place incentive programmes to show our commitment to this journey across the group. This drives investment for OPCO's to prioritize emission reduction initiatives and projects.
Other (ESG ratings)	MTN also drives investment to ensure that we are continually improving in our climate change disclosure and ESG ratings. This shows our commitment to sustainability and our goal to excel in the space within our sector.

**C4.5**

**(C4.5) Do you classify any of your existing goods and/or services as low-carbon products?**

Yes

**C4.5a**

**(C4.5a) Provide details of your products and/or services that you classify as low-carbon products.**

**C5. Emissions methodology**

**C5.1**

**(C5.1) Is this your first year of reporting emissions data to CDP?**

No

**C5.1a**

**(C5.1a) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?**

Row 1

**Has there been a structural change?**

Yes, other structural change, please specify (MTN Group sold its Namibia entity during the course of the 2021 financial year.)

**Name of organization(s) acquired, divested from, or merged with**

MTN Namibia

**Details of structural change(s), including completion dates**

Namibia was sold in August 2021. No energy data was captured from September 2021 onwards. Namibia has also been excluded from MTN's Net Zero Targets.

**C5.1b**

**(C5.1b) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?**

	Change(s) in methodology, boundary, and/or reporting year definition?	Details of methodology, boundary, and/or reporting year definition change(s)
Row 1	Yes, a change in methodology Yes, a change in boundary	MTN undertook a thorough assessment of its emissions accounting methodology in 2021. As such, MTN has improved the overall quality, completeness and accuracy of its GHG footprint. We also completed a Scope 3 materially screening assessment which assisted in the improvement of the coverage and reporting of our Scope 3 emissions to ensure that relevant and available categories are included in MTN's GHG footprint going forward. We also conducted a detailed analysis of the methodologies used for categorizing the emissions of our third-party service providers to ensure correct and appropriate allocation of emissions.

C5.1c

(C5.1c) Have your organization's base year emissions been recalculated as result of the changes or errors reported in C5.1a and C5.1b?

	Base year recalculation	Base year emissions recalculation policy, including significance threshold
Row 1	No, because the impact does not meet our significance threshold	Our significance threshold was not triggered to restate our base year emissions (2013).

C5.2

(C5.2) Provide your base year and base year emissions.

**Scope 1**

**Base year start**

January 1 2013

**Base year end**

December 31 2013

**Base year emissions (metric tons CO2e)**

769471

**Comment**

**Scope 2 (location-based)**

**Base year start**

January 1 2013

**Base year end**

December 31 2013

**Base year emissions (metric tons CO2e)**

636184

**Comment**

**Scope 2 (market-based)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 1: Purchased goods and services**

**Base year start**

January 1 2021

**Base year end**

December 31 2021

**Base year emissions (metric tons CO2e)**

2648685

**Comment**

**Scope 3 category 2: Capital goods**

**Base year start**

January 1 2021

**Base year end**

December 31 2021

**Base year emissions (metric tons CO2e)**

703518

**Comment**

**Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)**

**Base year start**

January 1 2021

**Base year end**

December 31 2021

**Base year emissions (metric tons CO2e)**

215206

**Comment**

**Scope 3 category 4: Upstream transportation and distribution**

**Base year start**

January 1 2021

**Base year end**

December 31 2021

**Base year emissions (metric tons CO2e)**

10480

**Comment**

**Scope 3 category 5: Waste generated in operations**

**Base year start**

January 1 2021

**Base year end**

December 31 2021

**Base year emissions (metric tons CO2e)**

25760

**Comment**

**Scope 3 category 6: Business travel**

**Base year start**

January 1 2021

**Base year end**

December 31 2021

**Base year emissions (metric tons CO2e)**

2563

**Comment**

**Scope 3 category 7: Employee commuting**

**Base year start**

January 1 2021

**Base year end**

December 31 2021

**Base year emissions (metric tons CO2e)**

25245

**Comment**

**Scope 3 category 8: Upstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 9: Downstream transportation and distribution**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 10: Processing of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 11: Use of sold products**

**Base year start**

January 1 2021

**Base year end**

December 31 2021

**Base year emissions (metric tons CO2e)**

452606

**Comment**

**Scope 3 category 12: End of life treatment of sold products**

**Base year start**

January 1 2021

**Base year end**

December 31 2021

**Base year emissions (metric tons CO2e)**

5098

**Comment**

**Scope 3 category 13: Downstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 14: Franchises**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 15: Investments**

**Base year start**

January 1 2021

**Base year end**

December 31 2021

**Base year emissions (metric tons CO2e)**

13878

**Comment**

**Scope 3: Other (upstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3: Other (downstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**C5.3**

---

**(C5.3) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

IPCC Guidelines for National Greenhouse Gas Inventories, 2006

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

The Greenhouse Gas Protocol: Scope 2 Guidance

**C6. Emissions data**

---

**C6.1**

---

**(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?**

**Reporting year**

**Gross global Scope 1 emissions (metric tons CO2e)**  
308398.97

**Start date**  
<Not Applicable>

**End date**  
<Not Applicable>

**Comment**  
Our scope 1 emissions for FY2021 include our operations across 20 OPCOs

**C6.2**

---

**(C6.2) Describe your organization's approach to reporting Scope 2 emissions.**

**Row 1**

**Scope 2, location-based**  
We are not reporting a Scope 2, location-based figure

**Scope 2, market-based**  
We are reporting a Scope 2, market-based figure

**Comment**  
Our scope 2 emissions for FY2021 include our operations across 20 OPCOs

**C6.3**

---

**(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO2e?**

**Reporting year**

**Scope 2, location-based**  
<Not Applicable>

**Scope 2, market-based (if applicable)**  
825170.34

**Start date**  
<Not Applicable>

**End date**  
<Not Applicable>

**Comment**  
Our scope 2 emissions for FY2021 include our operations across 20 countries.

**C6.4**

---

**(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?**

Yes

**C6.4a**

---

**(C6.4a) Provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure.**

**Source**

Scope 1, and 2 emissions from the following operating countries are not included: IranCell

**Relevance of Scope 1 emissions from this source**

Emissions are not relevant

**Relevance of location-based Scope 2 emissions from this source**

Emissions are not relevant

**Relevance of market-based Scope 2 emissions from this source (if applicable)**

Emissions are not relevant

**Explain why this source is excluded**

Iran is only included in sustainability reporting, with the exception of carbon management information which is excluded based on our indirect ownership holding.

**Estimated percentage of total Scope 1+2 emissions this excluded source represents**

**Explain how you estimated the percentage of emissions this excluded source represents**

Not applicable

---

**C6.5**

---

**(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.**

**Purchased goods and services**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

2648685

**Emissions calculation methodology**

Supplier-specific method  
Spend-based method  
Fuel-based method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

Actual data was attained from each outsourced TowerCo for the relevant OPCO's and calculated using appropriate emission factors as attained from the DEFRA 2021 Advanced Users Conversion Factor sheet.

For Procurement spend, data was provided by the MTN supply chain and procurement team based in Dubai. Spend data was provided to ERM for the each OPCO. Data cleaning was conducted by ERM in order to attain the 100% of procurement spend categories.

**Capital goods**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

703518

**Emissions calculation methodology**

Spend-based method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

Spend data was provided by MTN's group financial team for spend by OPCO for all tangible and intangible assets. ERM did not include any spend for assets not completed in the reporting year (i.e. work in progress spend), as these assets would likely be developed and in place in the following reporting year and would then be included.

All tangible and intangible assets that were in place in the reporting year were included. Emissions were calculated using the relevant EEIO factors.

**Fuel-and-energy-related activities (not included in Scope 1 or 2)**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

215206

**Emissions calculation methodology**

Fuel-based method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

Scope 1 and 2 actual consumptions were used from the data already provided by each MTN OPCO, to calculate the fuel and energy related activity emissions. DEFRA 2021 Advanced Users Conversion Factors were used.

---

## Upstream transportation and distribution

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

10480

### Emissions calculation methodology

Distance-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

Data used was collected from the MTN supply chain and procurement team in Dubai. Data was provided to ERM for the entire group as broken down by OPCO. Data was manually sorted, cleaned and assessed for each OPCO. Air, sea and road freight was included. The actual distance and weight for each entry was used with DEFRA 2021 Advanced Users Conversion Factors in order to calculate the emissions. The revenue assumption method, as outlined below was used whenever there were significant gaps in data.

## Waste generated in operations

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

25760

### Emissions calculation methodology

Waste-type-specific method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

OPCO specific waste data was provided through MTN's Green Office Project. Data was limited as information was not collected from all OPCO's. The revenue assumption method, as outlined below was used whenever there were significant gaps in data. DEFRA 2021 Advanced Users Conversion Factors were used.

## Business travel

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

2563

### Emissions calculation methodology

Distance-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

Air travel data used was collected from the MTN supply chain and procurement team in Dubai. Data was provided to ERM for the entire group. Air travel emissions was included based on actual data by OPCO. DEFRA 2021 Advanced Users Conversion Factors were used.

## Employee commuting

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

25245

### Emissions calculation methodology

Average data method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

Emissions were calculated based on the total number of employees (headcounts) for each OPCO in FY2021. The emission factor used was attained the GHG Protocol Scope 3 Screening Tool.

## Upstream leased assets

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

This category, in accordance with WRI/GHG Protocol guidance, has historically been excluded due the limited materiality of these emissions relative to the other categories.

## Downstream transportation and distribution

### Evaluation status

Relevant, not yet calculated

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

This category, in accordance with WRI/GHG Protocol guidance, has historically been excluded due to lack of available data and the limited materiality of these emissions relative to the other categories.

## Processing of sold products

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

This category has been excluded as the emissions related to processing of sold products have already been accounted for in Category 1.

## Use of sold products

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

452606

### Emissions calculation methodology

Supplier-specific method  
Hybrid method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

Emissions for devices and office equipment were included based on the procurement spend as mentioned for category 1. Emissions were calculated using applicable life cycle assessment methodologies and the highest estimated life cycle period. The life cycle for devices has been estimated to be 5 years and office equipment has been estimated to be 7 years.

## End of life treatment of sold products

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

5098

### Emissions calculation methodology

Supplier-specific method  
Hybrid method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### Please explain

Emissions for devices and office equipment were included based on the procurement spend as mentioned for category 1. Emissions were calculated using applicable life cycle assessment methodologies.

## Downstream leased assets

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

This category, in accordance with WRI/GHG Protocol guidance, has historically been excluded due to lack of available data and the limited materiality of these emissions relative to the other categories.

**Franchises**

**Evaluation status**

Relevant, not yet calculated

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

This category has not yet been calculated due to limited data availability from MTN franchises and due the limited materiality of these emissions relative to the other categories. A methodology to collect franchise data is still been developed and it is expected that Franchise related emissions will be reported in the next two years.

**Investments**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

13878

**Emissions calculation methodology**

Spend-based method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

Emissions from Mascom Botswana and Mauritius were included

**Other (upstream)**

**Evaluation status**

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Other (downstream)**

**Evaluation status**

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

C6.7

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(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

No

C6.10

---

**(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.**

**Intensity figure**

0.0000065732

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

1133569.31

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

172453000000

**Scope 2 figure used**

Market-based

**% change from previous year**

6

**Direction of change**

Decreased

**Reason for change**

In 2021, Scope 1 + 2 emissions decreased by 27% due to a significant decrease in fuel and electricity consumption across our OPCO's. The decrease is attributed to a significant increase in energy efficiency initiatives as rolled out by the OPCOs and the effects of the COVID19 pandemic.

**Intensity figure**

0.0041675342

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

1133569.31

**Metric denominator**

Other, please specify (GHG intensity per subscriber )

**Metric denominator: Unit total**

272000000

**Scope 2 figure used**

Market-based

**% change from previous year**

5

**Direction of change**

Decreased

**Reason for change**

In 2021, Scope 1 + 2 emissions decreased by 27% due to a significant decrease in fuel and electricity consumption across our OPCO's. The decrease is attributed to a significant increase in energy efficiency initiatives as rolled out by the OPCOs and the effects of the COVID19 pandemic.

**C7. Emissions breakdowns**

**C7.1**

**(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?**

Yes

**C7.1a**

**(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).**

Greenhouse gas	Scope 1 emissions (metric tons of CO2e)	GWP Reference
CO2	296220.95	IPCC Fifth Assessment Report (AR5 – 100 year)
CH4	11014.25	IPCC Fifth Assessment Report (AR5 – 100 year)
N2O	1163.77	IPCC Fifth Assessment Report (AR5 – 100 year)

**C7.2**

**(C7.2) Break down your total gross global Scope 1 emissions by country/region.**

Country/Region	Scope 1 emissions (metric tons CO2e)
Afghanistan	50352
Benin	9386
Cameroon	5870
Congo	11082
Côte d'Ivoire	2337
Ghana	8956
Guinea-Bissau	2740
Guinea	17909
Kenya	8
Liberia	20496
Namibia	7
Nigeria	65385
Rwanda	916
South Africa	34775
South Sudan	11112
Sudan	59336
Eswatini	1553
Uganda	5038
Zambia	1141

**C7.3**

**(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.**

By activity

**C7.3c**

**(C7.3c) Break down your total gross global Scope 1 emissions by business activity.**

Activity	Scope 1 emissions (metric tons CO2e)
Mobile combustion (Diesel)	10756
Stationary combustion (Diesel)	261855
Stationary combustion (natural gas)	12236
Refrigerant Use	21541
Mobile combustion (Petrol)	2011

**C7.5**

**(C7.5) Break down your total gross global Scope 2 emissions by country/region.**

Country/Region	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Afghanistan		6634
Benin		15413
Cameroon		5222
Congo		5054
Côte d'Ivoire		11323
Ghana		42486
Guinea-Bissau		1107
Guinea		7709
Iran (Islamic Republic of)		
Kenya		60
Liberia		512
Namibia		16
Nigeria		45650
Rwanda		2613
South Africa		635304
South Sudan		3419
Sudan		12471
Eswatini		2150
Uganda		21985
Zambia		5899
Please select		

C7.6

**(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.**

By facility

C7.6b

**(C7.6b) Break down your total gross global Scope 2 emissions by business facility.**

Facility	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
BTS Sites		555133
Data centres		190890
Buildings		38049
Stores		8513

C7.9

**(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?**

Decreased

C7.9a

**(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption		<Not Applicable>		Not applicable
Other emissions reduction activities		<Not Applicable>		Not applicable
Divestment		<Not Applicable>		Not applicable
Acquisitions		<Not Applicable>		Not applicable
Mergers		<Not Applicable>		Not applicable
Change in output		<Not Applicable>		Not applicable
Change in methodology		<Not Applicable>		Not applicable
Change in boundary		<Not Applicable>		Not applicable
Change in physical operating conditions		<Not Applicable>		Not applicable
Unidentified		<Not Applicable>		Not applicable
Other		<Not Applicable>		Not applicable

C7.9b

**(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?**

Market-based

C8. Energy

C8.1

**(C8.1) What percentage of your total operational spend in the reporting year was on energy?**

More than 15% but less than or equal to 20%

C8.2

**(C8.2) Select which energy-related activities your organization has undertaken.**

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	Yes

**C8.2a**

**(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.**

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	LHV (lower heating value)		1077782.3	1077782.3
Consumption of purchased or acquired electricity	<Not Applicable>		870973	870973
Consumption of purchased or acquired heat	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired steam	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired cooling	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of self-generated non-fuel renewable energy	<Not Applicable>		<Not Applicable>	
Total energy consumption	<Not Applicable>		1948755.49	1948755.59

**C8.2b**

**(C8.2b) Select the applications of your organization's consumption of fuel.**

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Yes
Consumption of fuel for the generation of heat	No
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	Yes

**C8.2c**

**(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.**

**Sustainable biomass**

**Heating value**

**Total fuel MWh consumed by the organization**

**MWh fuel consumed for self-generation of electricity**

**MWh fuel consumed for self-generation of heat**

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self-cogeneration or self-trigeneration**

**Comment**

**Other biomass**

**Heating value**

**Total fuel MWh consumed by the organization**

**MWh fuel consumed for self-generation of electricity**

**MWh fuel consumed for self-generation of heat**

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

**Comment**

**Other renewable fuels (e.g. renewable hydrogen)**

**Heating value**

**Total fuel MWh consumed by the organization**

**MWh fuel consumed for self-generation of electricity**

**MWh fuel consumed for self-generation of heat**

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

**Comment**

**Coal**

**Heating value**

**Total fuel MWh consumed by the organization**

**MWh fuel consumed for self-generation of electricity**

**MWh fuel consumed for self-generation of heat**

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

**Comment**

**Oil**

**Heating value**

**Total fuel MWh consumed by the organization**

**MWh fuel consumed for self-generation of electricity**

**MWh fuel consumed for self-generation of heat**

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

**Comment**

**Gas**

**Heating value**

**Total fuel MWh consumed by the organization**

**MWh fuel consumed for self-generation of electricity**

**MWh fuel consumed for self-generation of heat**

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

**Comment**

**Other non-renewable fuels (e.g. non-renewable hydrogen)**

**Heating value**

**Total fuel MWh consumed by the organization**

**MWh fuel consumed for self-generation of electricity**

**MWh fuel consumed for self-generation of heat**

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

**Comment**

**Total fuel**

**Heating value**

LHV

**Total fuel MWh consumed by the organization**

1077782.3

**MWh fuel consumed for self-generation of electricity**

1040467.27

**MWh fuel consumed for self-generation of heat**

37315.03

**MWh fuel consumed for self-generation of steam**

<Not Applicable>

**MWh fuel consumed for self-generation of cooling**

<Not Applicable>

**MWh fuel consumed for self- cogeneration or self-trigeneration**

**Comment**

**C8.2d**

**(C8.2d) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.**

	Total Gross generation (MWh)	Generation that is consumed by the organization (MWh)	Gross generation from renewable sources (MWh)	Generation from renewable sources that is consumed by the organization (MWh)
Electricity	870973.2	870973.2	0	0
Heat	0	0	0	0
Steam	0	0	0	0
Cooling	0	0	0	0

**C8.2e**

**(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in C6.3.**

**C8.2g**

**(C8.2g) Provide a breakdown of your non-fuel energy consumption by country.**

## C9. Additional metrics

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### C9.1

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**(C9.1) Provide any additional climate-related metrics relevant to your business.**

**Description**

Energy usage

**Metric value**

7921106

**Metric numerator**

Energy consumption (GJ)

**Metric denominator (intensity metric only)**

N/A

**% change from previous year**

13

**Direction of change**

Decreased

**Please explain**

The energy consumption (direct energy consumption) at MTN operating countries are estimated to have decreased by 13 %. This is due to the impact of COVID 19 on the operations and subsequent decrease in energy use. OPCO's have also rolled out initiatives which have resulted in a decrease in the energy consumption.

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## C10. Verification

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### C10.1

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**(C10.1) Indicate the verification/assurance status that applies to your reported emissions.**

	Verification/assurance status
Scope 1	No third-party verification or assurance
Scope 2 (location-based or market-based)	No third-party verification or assurance
Scope 3	No third-party verification or assurance

### C10.2

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**(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?**

No, but we are actively considering verifying within the next two years

## C11. Carbon pricing

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### C11.1

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**(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?**

Yes

### C11.1a

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**(C11.1a) Select the carbon pricing regulation(s) which impacts your operations.**

South Africa carbon tax

### C11.1c

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**(C11.1c) Complete the following table for each of the tax systems you are regulated by.**

**South Africa carbon tax**

**Period start date**

January 1 2021

**Period end date**

December 31 2021

**% of total Scope 1 emissions covered by tax**

84

**Total cost of tax paid**

655859

**Comment**

% = South African Scope 1 stationary combustion emissions = x (tCO<sub>2</sub>e) / MTN Scope 1 total emissions =x (tCO<sub>2</sub>e)  
Only South Africa pays this carbon tax, not the other countries.

**C11.1d**

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**(C11.1d) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?**

MTN prioritises compliance and ensures that all OPCOs are compliant with relevant country regulations. Each OPCO has a designated compliance officer in charge of ensuring compliance with current regulations. The climate-designated board member and the Social, and Ethics and Sustainability is also responsible for ensuring climate related compliance. The South Africa carbon Tax only affects MTN South Africa; however, MTN Zambia, MTN Nigeria and MTN Ghana also reported increasing legislative activity with respect to climate change legislation.

The South African National Treasury first introduced the idea of carbon tax in a discussion document in 2010. The design was proposed in 2013 followed by the publication of the Draft Bill late in 2015 which announced the expected start date to be in 2017. After numerous iterations and consultations the Bill was finally signed into law by the President on the 22nd of May 2019 and has come into effect from 1 June 2019. The carbon tax initially only applies to scope 1 emitters in the first phase. The carbon tax increases annually by consumer price inflation (CPI) +2% until 31 December 2022, and thereafter the rate of tax will be increased only by CPI. Therefore, the carbon tax rate will increase from R134 per tonne of carbon dioxide equivalent (CO<sub>2</sub>e) to R144 per tonne of CO<sub>2</sub>e for the 2022 calendar year. In 2021, the Department of Forestry, Fisheries and the Environment (DFFE) proposed to regulate GHG emissions under the voluntary carbon budgeting system by imposing caps on companies for a five-year period and phase out the carbon budget allowance of 5%.

MTN ensures compliance with environmental regulations by monitoring the development of new regulations across our geographic footprint. MTN engages with specialists to assist in understanding regulatory requirements, such as the South African Carbon Tax, to ensure continuous compliance.

**C11.2**

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**(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?**

No

**C11.3**

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**(C11.3) Does your organization use an internal price on carbon?**

No, but we anticipate doing so in the next two years

**C12. Engagement**

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**C12.1**

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**(C12.1) Do you engage with your value chain on climate-related issues?**

Yes, our suppliers

Yes, our customers/clients

Yes, other partners in the value chain

**C12.1a**

---

**(C12.1a) Provide details of your climate-related supplier engagement strategy.**

**Type of engagement**

---

Other, please specify (Compliance & on boarding)

#### Details of engagement

Other, please specify (Climate change is integrated into supplier evaluation processes)

#### % of suppliers by number

100

#### % total procurement spend (direct and indirect)

100

#### % of supplier-related Scope 3 emissions as reported in C6.5

80

#### Rationale for the coverage of your engagement

As the impacts of climate change become increasingly visible around the world, MTN believes in the benefits of a healthy planet and has pledged its commitment to achieve Net Zero emissions by 2040. This reflects MTN's recognition of the impact of its value chain on its overall footprint and as such we have also committed to sustainable procurement practices.

In order to maximize our impact in carbon reduction, we were actively engaging with our value chain partners in 2021. In 2021, we called on our suppliers to set their science-based GHG-reduction targets for their organizations and publicly communicate their commitment. We also work with key TowerCo partners to ensure they are committed to Net Zero, which will, in turn, drive a reduction in MTN's Scope 3 emissions.

#### Impact of engagement, including measures of success

Although we are still in the early stages of engagement, we understand that several of our value chain partners have already committed to their own SBTs such as Ericsson, Apple and Nokia. We endeavour to expand our business whilst continuing to prioritize sustainable innovation and growth.

We have 208 of our Group-wide suppliers that have pledged to join MTN's road to Net Zero to reduce Scope 3 emissions, exceeding our initial target of 150 Group-wide suppliers and we continue encouraging our suppliers to pledge and become part of this initiative.

#### Comment

Listed below are some of the key requests we will be making to our value chain in the form of a letter to our partners requesting them to pledge support –

1. Setting a science-based carbon reduction target for your organization and publicly communicating commitment.
2. Prepare an annual emissions reports and submit a CDP response annually and sharing your emissions data with us;
3. Embedding GHG emissions reductions at both a services and product level;
4. Ensuring your own suppliers are aware of this call to action, so that it can then be cascaded through your business's supply chain, activity building the capacity of local suppliers in the process; and
5. Supporting the ECO rating of each device and activity supporting our activities to provide life cycle product service to customers including trade-ins and recycling options.

More detail is provided in the following links –

[https://www.linkedin.com/posts/mtn\\_mtnroadtozero-esgathecore-goodtogether-activity-6822842284703399936-jEPf](https://www.linkedin.com/posts/mtn_mtnroadtozero-esgathecore-goodtogether-activity-6822842284703399936-jEPf)

<https://mtn-investor.com/mtn-road-to-zero/pledge.php>

<https://mtn-investor.com/mtn-road-to-zero/pdf/letter-to-partners-mtn-road-to-zero-signed.pdf>

---

#### Type of engagement

Innovation & collaboration (changing markets)

#### Details of engagement

Run a campaign to encourage innovation to reduce climate impacts on products and services

#### % of suppliers by number

100

#### % total procurement spend (direct and indirect)

100

#### % of supplier-related Scope 3 emissions as reported in C6.5

80

#### Rationale for the coverage of your engagement

As the impacts of climate change become increasingly visible around the world, MTN believe in the benefits of a healthy planet and has pledged its commitment to achieve Net Zero emissions by 2040. This reflects MTN's recognition of the impact of its value chain on its overall footprint and as such we have also committed to sustainable procurement practices.

In order to maximize our impact in carbon reduction, we are actively engaging with our value chain partners in 2021. In 2021, we called on our suppliers to Set their science-based GHG-reduction target for their organizations and publicly communicate their commitment. We also work with key TowerCo partners to ensure they are committed to Net Zero, which will, in turn, drive a reduction in MTN's Scope 3 emission

#### Impact of engagement, including measures of success

Although we are still in the early stages of engagement, we understand that several of our value chain partners have already committed to their own SBTs such as Ericsson, Apple and Nokia. We endeavour to expand our business whilst continuing to prioritize sustainable innovation and growth.

We have 208 of our Group-wide suppliers that have pledged to join MTN's road to Net Zero to reduce Scope 3 emissions, exceeding our initial target of 150 Group-wide suppliers and we continue encouraging our suppliers to pledge and become part of this initiative

#### Comment

Listed below are some of the key requests we will be making to our value chain in the form of a letter to our partners requesting them to pledge support –

1. Setting a science-based carbon reduction target for your organization and publicly communicating commitment.
2. Prepare an annual emissions reports and submit a CDP response annually and sharing your emissions data with us;
3. Embedding GHG emissions reductions at both a services and product level;
4. Ensuring your own suppliers are aware of this call to action, so that it can then be cascaded through your business's supply chain, activity building the capacity of local suppliers in the process; and

5. Supporting the ECO rating of each device and activity supporting our activities to provide life cycle product service to customers including trade-ins and recycling options.

More detail is provided in the following links –

[https://www.linkedin.com/posts/mtn\\_mtnroadtozero-esgathecore-goodtogether-activity-6822842284703399936-jEPf](https://www.linkedin.com/posts/mtn_mtnroadtozero-esgathecore-goodtogether-activity-6822842284703399936-jEPf)

<https://mtn-investor.com/mtn-road-to-zero/pledge.php>

<https://mtn-investor.com/mtn-road-to-zero/pdf/letter-to-partners-mtn-road-to-zero-signed.pdf>

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#### Type of engagement

Engagement & incentivization (changing supplier behavior)

#### Details of engagement

Run an engagement campaign to educate suppliers about climate change

#### % of suppliers by number

100

#### % total procurement spend (direct and indirect)

100

#### % of supplier-related Scope 3 emissions as reported in C6.5

80

#### Rationale for the coverage of your engagement

MTN's suppliers are broadly categorised into three main areas: commercial and indirect (e.g., logistics, business consulting, device suppliers, etc.), information technology (e.g. infrastructure and systems), and networks (e.g., core and transmission solutions, etc.). We have approximately 160 Group suppliers, with agreements to cover requirements for multiple locations across MTN's footprint. Our local operations also contract local suppliers who offer products and services usually required for specific markets. In total, we have approximately 13 000 suppliers. MTN's suppliers are located globally. Key network suppliers are in Europe and China, while our local supplier base is spread across Africa and the Middle East. Sector-specific characteristics include the fact that automation remains low and the use of labour therefore remains key to the operations of the supply chain, and that the telecommunications supply chain is subject to stringent custom regulations on imported items.

#### Impact of engagement, including measures of success

The impact of this engagement and its measure of success is deemed medium due to the limitations on data availability. MTN has noticed that due to the engagement there is increased awareness of the importance of provision of efficient energy sources/ renewable energy technologies. This in turn has led to more partnerships working on the deployment of solar sites/ technologies (an example is the rural roll-out programme that was mentioned in C3.1c.)

This does not include TowerCo's (i.e., ATC/ IHS) but rather network supplier such as ZTE, Huawei, and Ericsson etc.

#### Comment

The % of suppliers by number and % of total procurement spend are difficult to quantify due to the significant variances across our 20 countries of operation.

---

#### Type of engagement

Innovation & collaboration (changing markets)

#### Details of engagement

Other, please specify (faster deployment with a smaller environmental footprint)

#### % of suppliers by number

100

#### % total procurement spend (direct and indirect)

100

#### % of supplier-related Scope 3 emissions as reported in C6.5

#### Rationale for the coverage of your engagement

Network suppliers and technical equipment suppliers. MTN's suppliers are broadly categorised into three main areas: commercial and indirect (e.g., logistics, business consulting, device suppliers, etc.), information technology (e.g., infrastructure and systems), and networks (e.g., core and transmission solutions, etc.). We have approximately 160 Group suppliers, with agreements to cover requirements for multiple locations across MTN's footprint. Our local operations also contract local suppliers who offer products and services usually required for specific markets. In total, we have approximately 13 000 suppliers. MTN's suppliers are located globally. Key network suppliers are in Europe and China, while our local supplier base is spread across Africa and the Middle East Sector-specific characteristics include the fact that automation remains low and the use of labour therefore remains key to the operations of the supply chain, and that the telecommunications supply chain is subject to stringent custom regulations on imported items

#### Impact of engagement, including measures of success

The impact of this engagement and its measure of success is deemed medium due to the limitations on data availability. MTN has noticed that due to the engagement there is increased awareness of the importance of provision of efficient energy sources/ renewable energy technologies. This in turn has led to more partnerships working on the deployment of solar sites/ technologies (an example is the rural roll-out programme that was mentioned in C3.1c.)

This does not include TowerCo's (i.e., ATC/ IHS) but rather network supplier such as ZTE, Huawei, and Ericsson etc.

#### Comment

The % of suppliers by number and % of total procurement spend difficult to quantify due to the significant variances across our 20 countries of operation.

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### C12.1b

**(C12.1b) Give details of your climate-related engagement strategy with your customers.**

**Type of engagement & Details of engagement**

Education/information sharing	Share information about your products and relevant certification schemes (i.e. Energy STAR)
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**% of customers by number**

100

**% of customer - related Scope 3 emissions as reported in C6.5**

**Please explain the rationale for selecting this group of customers and scope of engagement**

We engage with our customers through the publication of our annual sustainability report, communications with media organisations on our sustainability initiatives, reporting publicly to ESG and SRI (Socially responsible investing) investors and analysts, providing information from third party questionnaires and the assessments of our publicly reported performance by university organisations and other third parties not commissioned by MTN.

We also encourage our customers in the retail, corporate and public services to become more aware of their environmental impact and wherever possible to increase their realisable environmental savings. Some operations also engage with our customers on environmental management and what MTN is doing in this regard.

Additionally, we engage with our enterprise customers on a range of issues, most notably to understand their key challenges from a climate/environmental perspective in order to offer IoT solutions that can help them mitigate or reduce their environmental impact or potential losses, and how to use resources more efficiently as explained in previous sections on MTN's IoT product lines and opportunities.

**Impact of engagement, including measures of success**

Our solutions and engagement help community's access advice and assistance on health, education, energy, agriculture and many more vital services. In Rwanda, MTN customers can use their mobile phones to place orders for life-saving medicines to be delivered in remote areas using drones. Digital solutions also assist communities to mitigate and adapt to environmental impacts. For example, in Nigeria, we work with cattle owners and veterinarians to track the movements of livestock, enabling identification and validation of ownership, as well as disease control, and support for international beef exports. In South Africa, where water scarcity is a reality, we are trialling low-power solutions that will help industries control water flows and identify leakages.

Solar energy for digital and financial inclusion: MTN has partnered with lease-to-own solar product manufacturers to offer affordable, environmentally responsible and safe solutions that enable people to keep their phones and other electronic devices charged and connected to digital, services and enjoy access to mobile financial services including remittances and bill payments. We estimate savings of between US\$0.15 and US\$0.48 per day in energy costs for users, depending on the country in which they live. We replaced more than 10 million litres of kerosene with safe, clean and renewable energy.

**Type of engagement & Details of engagement**

Collaboration & innovation	Other, please specify (Education/information sharing )
----------------------------	--

**% of customers by number**

100

**% of customer - related Scope 3 emissions as reported in C6.5**

**Please explain the rationale for selecting this group of customers and scope of engagement**

We engage with our customers through the publication of our annual sustainability report, communications with media organisations on our sustainability initiatives, reporting publicly to ESG and SRI (Socially responsible investing) investors and analysts, providing information from third party questionnaires and the assessments of our publicly reported performance by university organisations and other third parties not commissioned by MTN.

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Additionally, we engage with our enterprise customers on a range of issues, most notably to understand their key challenges from a climate/environmental perspective in order to offer IoT solutions that can help them mitigate or reduce their environmental impact or potential losses, and how to use resources more efficiently as explained in previous sections on MTN's IoT product lines and opportunities.

**Impact of engagement, including measures of success**

Our solutions and engagement help community's access advice and assistance on health, education, energy, agriculture and many more vital services. In Rwanda, MTN customers can use their mobile phones to place orders for life-saving medicines to be delivered in remote areas using drones. Digital solutions also assist communities to mitigate and adapt to environmental impacts. For example, in Nigeria, we work with cattle owners and veterinarians to track the movements of livestock, enabling identification and validation of ownership, as well as disease control, and support for international beef exports. In South Africa, where water scarcity is a reality, we are trialling low-power solutions that will help industries control water flows and identify leakages.

Solar energy for digital and financial inclusion: MTN has partnered with lease-to-own solar product manufacturers to offer affordable, environmentally responsible and safe solutions that enable people to keep their phones and other electronic devices charged and connected to digital, services and enjoy access to mobile financial services including remittances and bill payments. We replaced more than 10 million litres of kerosene with safe, clean and renewable energy

**C12.1d**

**(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.**

MTN has committed to Net Zero by 2040 and in line with this commitment we conducted a full Scope 3 materiality screening to better understand the emissions coming from our value chain so that we can implement actions to mitigate these. This materiality screening was conducted in 2021 and influences the comprehensiveness and accuracy of our GHG footprint, as well as our overall understanding of our emissions across our value chain. In this process we aim to improve engagement with our value chain partners to encourage supplier and customer emission reduction targets.

In 2021 we also sent a pledge letter to all partners in our value chain to encourage their commitment to a low carbon economy transition. We called on our suppliers to –

1. Setting a science-based carbon reduction target for your organization and publicly communicating commitment.
2. Prepare an annual emissions report and submit a CDP response annually and sharing your emissions data with us;
3. Embedding GHG emissions reductions at both a services and product level;
4. Ensuring your own suppliers are aware of this call to action, so that it can then be cascaded through your business's supply chain, activity building the capacity of local suppliers in the process; and
5. Supporting the ECO rating of each device and activity supporting our activities to provide life cycle product service to customers including trade-ins and recycling options.

We believe in the power of partnerships. As a result, we have strengthened our commitment to reducing our total impact, by including Scope 3 emissions targets in Project Zero based on the Scope 3 materiality screening conducted in 2021. We believe that engaging with our value chain and having a unified approach can help us all achieve a low carbon economy, focused on sustainable growth. It should also be noted that MTN is reliant on leased sites, as such we regard Scope 3 emissions as material over the medium to long term, while Scope 1 emissions may decline materially. We engage directly with infrastructure owners/asset managers, tower management companies, managed service providers and own equipment manufacturers on ensuring energy-efficient operations and we seek their support for investment/ provision of services powered by renewable energy where possible. We request our tower management providers to provide information on energy costs and consumption of the assets we lease or use and to share information on their energy reduction initiatives or activities and climate change risks and mitigation efforts. Engagement through data collection and quality checks are conducted on a monthly/ quarterly basis.

**C12.2**

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**(C12.2) Do your suppliers have to meet climate-related requirements as part of your organization's purchasing process?**

No, but we plan to introduce climate-related requirements within the next two years

**C12.3**

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**(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?**

**Row 1**

**Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate**

Yes, we engage indirectly through trade associations

**Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?**

Yes

**Attach commitment or position statement(s)**

MTN Position Statements attached  
MTN-Eco-responsibility-Energy-and-Climate-change.pdf  
MTN-Eco-responsibility-Environmental-resources.pdf  
MTN-position-on-Responsible-Supply-Chain.pdf

**Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy**

Since 2018, MTN has a well-established and robust MTN Group stakeholder and reputation management strategy. The framework ensures that we deliver on the factors that drive a strong reputation, while practicing quality engagement. Proactive stakeholder engagement is part of our approach guided by MTN Group stakeholder and reputation management strategy framework comprising a strategy, policy and blueprint.

The Group policy outlines principles for effective Stakeholder engagement that are universally applicable across MTN in alignment with King IV™ requirements. Stakeholder engagement practices may vary across operating companies and are often tailored to fit the Operating and stakeholder environment.

**Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**C12.3b**

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**(C12.3b) Provide details of the trade associations your organization engages with which are likely to take a position on any policy, law or regulation that may impact the climate.**

**Trade association**

Other, please specify (Global System Mobile Association (GSMA))

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We have already influenced them to change their position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

MTN is a member of the GSMA, in addition our Group President and CEO sits on the GSMA Board and our Group Chief Technology and Information Officer is a part of the GSMA Climate Taskforce. The GSMA represents the interests of mobile operators worldwide. The GSMA also produces industry-leading events such as the Mobile World Congress, Mobile World Congress Shanghai and Mobile 360 Series conference and engages with regulatory authorities, the non-industry partners and other organisations all working to enhance access to digital communications.

MTN has joined the Climate Taskforce and the GSMA-led industry-wide plan to achieve net-zero greenhouse gas emissions by 2050 in line with the Paris Agreement. As part of the GSMA initiative, MTN, and other participating operators, will be partnering with the international community, climate experts and third-party organisations to advance industry progress, establish best practices, and support disclosure and target setting. MTN continues to support the work of GSMA through the Climate Taskforce and other programmes, including on rural network rollout (where rural sites are powered by solar solutions). GSMA has also awarded MTN funding for trailing prepaid solar energy solutions for domestic and small-emerging enterprises, which has ultimately led to such solutions available in five MTN countries of operation (with plans for further rollout).

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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C12.4

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**(C12.4) Have you published information about your organization’s response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

**Publication**

In voluntary sustainability report

**Status**

Complete

**Attach the document**

MTN-Eco-responsibility-Energy-and-Climate-change.pdf

**Page/Section reference**

Pages 3 -13; 17 - 27; 35 - 37; 48 -50; 66 - 69

**Content elements**

- Governance
- Strategy
- Risks & opportunities
- Emissions figures
- Emission targets
- Other metrics

**Comment**

Sustainability Report 2021

**Publication**

In mainstream reports

**Status**

Complete

**Attach the document**

2021-MTN-Group-Integrated-Annual-Report.pdf

**Page/Section reference**

Pg 2- 5; 10 -14; 16 - 40; 54; 68 -71; 64 - 81; 83

**Content elements**

- Governance
- Strategy
- Risks & opportunities
- Emissions figures
- Emission targets
- Other metrics

**Comment**

Integrated Report 2021

**C15. Biodiversity**

**C15.1**

**(C15.1) Is there board-level oversight and/or executive management-level responsibility for biodiversity-related issues within your organization?**

	Board-level oversight and/or executive management-level responsibility for biodiversity-related issues	Description of oversight and objectives relating to biodiversity	Scope of board-level oversight
Row 1	Yes, both board-level oversight and executive management-level responsibility	<p>The MTN Board oversees all sustainability related issues and processes, this includes biodiversity. Responsibility has been assigned to the Social, Ethics and Sustainability committee for issues pertaining to biodiversity. The committee ensures that biodiversity assessments are conducted at a group level- if required by regulations – during the planning phase to obtain authorization to construct and operate a base station. Both globally acceptable and local level policies and regulations are considered by MTN and our OPCO’s.</p> <p>Biodiversity is also considered at OPCO level, as regulations differ between countries. For example, MTN South Africa is committed to the processes set out in the National Environmental Management Act and the National Heritage Resources. To further ensure compliance with laws related to biodiversity, a specialist third-party supports MTN South Africa by conducting and completing a sample of environmental legal compliance assessments. Uganda, also carries out Environmental Impact Assessments (EIA) which get submitted to NEMA for approval, when they are constructing buildings, warehouses etc.</p> <p>MTN minimise biodiversity loss and environmental impact with our partners by safeguarding against the removal, damage or disturbance of flora and fauna.</p> <p>MTN reduce the potential disturbance to the natural environment such as vegetation removal or habitat disturbances during construction. We do not condone hunting, trapping, shooting or poisoning of any fauna and adhere to hazardous waste management regulations to mitigate the potential of its waste impacting the receiving environment and its biodiversity.</p>	<Not Applicable>

**C15.2**

**(C15.2) Has your organization made a public commitment and/or endorsed any initiatives related to biodiversity?**

	Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity	Biodiversity-related public commitments	Initiatives endorsed
Row 1	No, but we plan to do so within the next 2 years	<Not Applicable>	<Not Applicable>

**C15.3**

**(C15.3) Does your organization assess the impact of its value chain on biodiversity?**

	Does your organization assess the impact of its value chain on biodiversity?	Portfolio
Row 1	Yes, we assess impacts on biodiversity in both our upstream and downstream value chain	<Not Applicable>

**C15.4**

**(C15.4) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?**

	Have you taken any actions in the reporting period to progress your biodiversity-related commitments?	Type of action taken to progress biodiversity- related commitments
Row 1	Yes, we are taking actions to progress our biodiversity-related commitments	Land/water protection Education & awareness Other, please specify (Recycling initiatives to reduce waste)

**C15.5**

**(C15.5) Does your organization use biodiversity indicators to monitor performance across its activities?**

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
Row 1	No, we do not use indicators, but plan to within the next two years	Please select

**C15.6**

**(C15.6) Have you published information about your organization’s response to biodiversity-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

Report type	Content elements	Attach the document and indicate where in the document the relevant biodiversity information is located
In voluntary sustainability report or other voluntary communications	Content of biodiversity-related policies or commitments Governance Details on biodiversity indicators	MTN-Group-FY-21-Sustainability-Report.pdf  <a href="https://group.mtn.com/wp-content/uploads/2021/02/MTN-Position-on-Water-Management.pdf">https://group.mtn.com/wp-content/uploads/2021/02/MTN-Position-on-Water-Management.pdf</a> <a href="https://group.mtn.com/wp-content/uploads/2021/10/MTN-Eco-responsibility-Environmental-resources.pdf">https://group.mtn.com/wp-content/uploads/2021/10/MTN-Eco-responsibility-Environmental-resources.pdf</a>

**C16. Signoff**

**C-FI**

**(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.**

**C16.1**

**(C16.1) Provide details for the person that has signed off (approved) your CDP climate change response.**

	Job title	Corresponding job category
Row 1	Group Chief Sustainability and Corporate Affairs Officer GM Group Sustainability and Shared Value Executive Network Design & Planning Senior Manager Data Centre Facilities and Infrastructure	Environment/Sustainability manager

## SC. Supply chain module

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### SC0.0

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**(SC0.0) If you would like to do so, please provide a separate introduction to this module.**

*As per introduction in above response.*

### SC0.1

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**(SC0.1) What is your company's annual revenue for the stated reporting period?**

	Annual Revenue
Row 1	

### SC1.1

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**(SC1.1) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.**

### SC1.2

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**(SC1.2) Where published information has been used in completing SC1.1, please provide a reference(s).**

### SC1.3

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**(SC1.3) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?**

Allocation challenges	Please explain what would help you overcome these challenges
Diversity of product lines makes accurately accounting for each product/product line cost ineffective	MTN has committed to Net Zero by 2040 and as part of its Ambition 2025 strategy has placed ESG at the core of its business strategy. Initiatives such as Project Zero are focused on reducing the emissions, Circular Economy can be considered its counterpart "Project Infinity" extend lifecycles and thereby support the avoidance of emissions. MTN is also undergoing a Scope 3 materiality screening in FY2021 to better understand emissions arising from our value chain, both downstream and upstream. Doing this will help us to better define emissions related to different products and services.
Customer base is too large and diverse to accurately track emissions to the customer level	MTN has committed to Net Zero by 2040 and as part of its Ambition 2025 strategy has placed ESG at the core of its business strategy. Initiatives such as Project Zero are focused on reducing the emissions, Circular Economy can be considered its counterpart "Project Infinity" extend lifecycles and thereby support the avoidance of emissions. MTN is also undergoing a Scope 3 materiality screening in FY2021 to better understand emissions arising from our value chain, both downstream and upstream. Doing this will help us to better define emissions related to different products and services.

### SC1.4

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**(SC1.4) Do you plan to develop your capabilities to allocate emissions to your customers in the future?**

Yes

### SC1.4a

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**(SC1.4a) Describe how you plan to develop your capabilities.**

MTN has committed to Net Zero by 2040 and as part of its Ambition 2025 strategy has placed ESG at the core of its business strategy. Initiatives such as Project Zero are focused on reducing the emissions, Circular Economy can be considered its counterpart "Project Infinity" extend lifecycles and thereby support the avoidance of emissions. MTN is also undergoing a Scope 3 materiality screening in FY2021 to better understand emissions arising from our value chain, both downstream and upstream. Doing this will help us to better define emissions related to different products and services. As part of this, MTN intends to improve its knowledge and quantification of Scope 3 emissions, which will also include allocation of emissions to customers in the future.

### SC2.1

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**(SC2.1) Please propose any mutually beneficial climate-related projects you could collaborate on with specific CDP Supply Chain members.**

### SC2.2

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(SC2.2) Have requests or initiatives by CDP Supply Chain members prompted your organization to take organizational-level emissions reduction initiatives?

SC4.1

(SC4.1) Are you providing product level data for your organization's goods or services?

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

Please confirm below

I have read and accept the applicable Terms