

MTN POSITION STATEMENT

Communications and editorial guidelines

Introduction

Reputation is an asset that is important to the long-term sustainability of the organisation. MTN is working to develop a proactive reputation culture that is focused on social purpose, transparency, and creating value for all our stakeholders. We understand the need to not only state our belief – that everyone deserves the benefits of a modern connected life – but to be prepared to be evaluated against it and continuously demonstrate that our activities align with it.

To achieve our desired business outcomes, it is critical that MTN communicates in a manner that is appropriate, consistent and in line with disclosure requirements. When MTN and its group of companies speak uniformly and follow the same process of disseminating information, it is apparent in the Group's reputation and valuation.

Purpose

This policy aims to set out MTN Group's principles and approach to consistently communicating its values and best practices with all its stakeholders while ensuring that MTN Group remains compliant with its listings requirements, licence conditions and legal obligations.

MTN's approach

The following standards guide us:

- South African Companies Act.
- King IV Code and Report on Corporate Governance.
- Johannesburg Stock Exchange Listings Requirements.
- South Africa Financial Markets Act (FMA).

Key principles

- As a listed company, MTN Group is obliged to promptly disclose material or price-sensitive information to the public across relevant stock exchanges, irrespective of the jurisdiction in which we operate.
- It is our policy to issue communication and disclose information widely at a time deemed appropriate in compliance with statutory or stock exchange rules.
- We recognise the value of communicating promptly and non-selectively, releasing relevant information to enable informed decision-making for our internal and external stakeholders.
- We believe in the rights of all people using digital communications to freely communicate and share information and opinions equally and to enjoy the right to privacy and information security without unlawful interference.

- We are committed to providing the public with clear, accurate and reliable communication and information at all times.
- We aim to be honest and respectful in our communication and content, always striving to avoid the use of omissions, ambiguities and any other form which could lead to error or deceit.
- We align our communication with our values and beliefs, ensuring neutrality and respecting the rights of all persons.
- All communication, as articulated within our Communications Policy, follows the due governance approval process.
- We comply with national and international communication standards and laws, as well as compliance with reporting and disclosure standards.
- We promote freedom of expression, pluralism, and diversity and are committed to inclusion, education, and truthful information.
- We are committed to upholding the human rights internationally recognised by the Universal Declaration of Human Rights as well as intellectual property laws.
- We avoid communications and contents that encourage illegal behaviour, violence, discrimination, or exclusion based on gender, religion, race, economic status, education or political or sexual orientation.
- Protection of minors: We are committed to children and young people. Our communications seek to uphold children's rights and protect them from content and communications that may cause them physical, moral, or psychological harm.
- We strive to ensure that our communications with customers are complete, sufficient, and detailed, avoiding technical language and providing all the necessary information to understand the conditions of our products and services.
- We strive to ensure that the content of our communications avoids intimidating, harassing, insulting, or threatening any person or entity.
- We strive to remain impartial, seeking to reflect the views and experiences of our audiences – so that our output as a whole includes a breadth and diversity of opinion, and no significant strand of thought is under-represented or omitted.

Media ethics

- We are committed to protecting the privacy of all our stakeholders and safeguarding information sources and story subjects.
- We are committed to upholding intellectual property laws across our markets.
- We are committed to upholding healthy, informed, and democratic values in our content development.

Roles and responsibilities

Our Board – through the Group Social, Ethics and Sustainability Committee – oversees the Group's actions and performance regarding communications and editorial guidelines. The Group's Executive Committee is responsible for policy implementation, driven by the Group Sustainability and Corporate Affairs function.

Applicability

MTN Group, all its operating companies, all MTN employees, directors, and representatives in all territories are committed to transparency and disclosure regarding human rights at MTN.

Communication and training

The policy is shared with employees of MTN's operating companies, subsidiaries and partners. It is translated into local languages as required. Detailed training is provided for various functional, business, and operating market areas and levels of management. Monitoring and compliance take place on an ongoing basis to ensure adherence to the Communications Policy.

MTN recognises the importance of having procedures and a facility in place whereby employees and other stakeholders can safely and confidentially report instances of fraud, misconduct, illegal activities, or other irregularities (i.e., incidents that impede on judicially protected freedoms of expression, information security and privacy), this is done through MTN's whistle-blowing mechanism.