MTN POSITION STATEMENT

Environmental management

Introduction

MTN seeks to improve its positive direct and indirect environmental impacts, avoid and reduce any negative impacts and enhance its resilience during disruptive environmental conditions. This is done by supporting the global imperative for valuing the environment through the prudent use of resources, applying precautionary principles in environmental management, and ensuring that all operations comply with laws and regulations applicable to each operating company (Opco).

MTN's sustainability strategic framework aims to create shared value through responsible environmental, social and governance (ESG) practices, driving socioeconomic benefits through a four-pillar approach. Operating in environmentally vulnerable countries, MTN seeks to improve its environmental impacts, reduce negative effects, and enhance resilience. This is achieved through prudent resource use, precautionary principles in environmental management, and compliance with applicable laws and regulations. The Group supports the global imperative for valuing the environment and ensuring compliance with applicable laws and regulations.

Purpose

• Sets out the commitments and implementation actions necessary to realise the Group’s sustainability vision to protect our planet and reduce our carbon footprint across markets.
• Sets out our commitments to minimise our environmental impact, reduce our carbon footprint and protect the planet.
• To guide behaviours, practices, principles, and tools to achieve net zero by 2040.

Approach

The following globally defined standards guide MTN:

• GRI sustainability reporting standards.
• UN Global Compact principles.
• The Task Force on Climate-related Financial Disclosures (TCFD).
• Carbon Disclosure Project (CDP).
• United Nations Sustainable Development Goals (SDGs).
• Compliance with environmental legislation, regulations, and standards like ISO 14001: 2015, CEO Water Mandate, IFC Performance Standards, OECD and AU standards is mandatory.

MTN’s approach to the environment

MTN acknowledges the environmental standards and stakeholder expectations in its telecommunications presence, committing to environmental management as a social licence to operate. MTN, through its business nature, infrastructure installation, resource usage, and equipment disposal, generates negative environmental impact and waste in four main areas through its materiality matrix:

• Infrastructure, facilities and assets: MTN is responsible for the installation, operation, maintenance, safety levels, and decommissioning of network infrastructure and all facilities owned, operated, leased, or shared.
• Energy and climate: MTN uses fossil fuel-based energy for powering its networks, data centres, buildings, equipment, generators, cooling systems, transportation, and other owned, operated, leased, or shared systems and activities.
e-Waste: The policy ensures the safe operation and disposal of electrical and electronic equipment, including radio transmission equipment, batteries, lighting, computers, consumer devices, and SIM cards, consumed by MTN's operations and customers.

Natural and manufactured resources and waste: Resources used by operations, employees and users of MTN’s premises, including paper, water, plastic, glass, metal and other resources.

Biodiversity and land use: The construction, operation and dismantling of a base station, including considering the proximity to existing roads and electricity infrastructure in construction.

**MTN’s key environmental management principle**

- We are committed to environmental protection and management.
- We commit to using natural resources and energy more efficiently.
- We commit to reducing emissions, releases and waste. We commit to delivering initiatives to minimise MTN's environmental impact and reduce our carbon footprint.
- We commit to promote and preserve biodiversity and ecology.
- We will comply with the applicable national laws and environmental regulations.
- We will work collectively with our supply chain and sub-contractors to drive environmental management practices and emissions reduction as part of MTN's net zero ambition.
- We strive to regularly engage with stakeholders on various environmental matters to ensure we integrate our stakeholder interests and priorities.
- We shall drive awareness and mitigation measures with our customers and users of our premises, services and stakeholders to minimise their environmental impact where possible.
- We commit to implementing environmental management systems and adopting international, regional and national environmental standards.
- We shall employ environmental management and carbon reduction requirements in our purchasing decisions and procurement processes when investing in digital products, services and infrastructure.
- We shall consider environmental issues in all business strategies and initiatives as well as mergers, acquisitions, country entry and exit.
- We seek to monitor our environmental performance and to report annually on environmental management using globally and locally recognised reporting standards.
- We aim to monitor, assess and address environmental risks regularly.
- We shall foster environmental awareness and training, building a culture of shared responsibility, enabling cross-functional knowledge sharing, behavioural change and accountability.
- We aim to collaborate with stakeholders to support progress towards climate change mitigation, adaptation, and green technological solutions.

**Environmental leadership**

- MTN aims to be a good environmental management steward by actively assessing and mitigating our environmental impacts. MTN is committed to abiding by applicable environmental laws, rules, and standards and will continually look for ways to reduce our environmental impact.

**Mitigation of climate change**

- MTN is committed to reducing greenhouse gas emissions across our operations. By introducing energy-efficient technologies, encouraging renewable energy sources, and
applying sustainable practices across our value chain, MTN will strive to reduce its carbon footprint.

- We support programmes that help the communities we serve become more aware and resilient to climate change-related issues.

**Waste management**

- MTN is dedicated to preserving natural resources and reducing waste generation at source through waste prevention, resource efficiency and greater adoption of clean and environmentally sound technologies and processes.
- We emphasise efficient resource utilisation and seek creative ways to reduce our consumption and increase resource productivity.
- We work to spread sensible waste management methods and embrace the circular economy.
- We are committed to reducing waste generation through prevention and reduce, reuse and recycle.
- We ensure environmentally sound management of all wastes.
- We acknowledge the impact of hazardous and non-hazardous waste on the environment and are committed to reducing our waste generation. We will strive to recover, reuse, treat, and properly dispose of waste to minimise environmental impact.

**Water management**

- We conduct water-use assessments to understand how much we reduce our water use and manage water scarcity risks in our direct operations and offices.
- We invest in programmes and use new technologies to drive water conservation. We raise awareness of water sustainability within corporate culture.
- We encourage suppliers to improve water conservation, quality monitoring, waste-water treatment and recycling practices.
- We endeavour to understand the water and sanitation challenges and to support water management programmes in the communities where we operate.
- Work with national, regional, and local governments and public authorities to address water sustainability issues and policies, as well as with relevant NGOs and institutions.

**Protection of biodiversity and ecosystems**

- MTN appreciates the value of healthy ecosystems to ensure a greener planet for future generations. By incorporating environmental considerations in our network planning, infrastructure development, and site operations, we will proactively endeavour to safeguard and preserve biodiversity.
- We recognise the importance of protecting biodiversity and conserving natural habitats, water bodies, flora and fauna. Before undertaking any new project or significant operational changes, we will conduct a thorough environmental impact assessment to identify potential risks to biodiversity.
- We will actively seek opportunities to protect and conserve natural habitats within our new project or operational areas. This includes forests, wetlands, grasslands, and terrestrial and marine aquatic ecosystems.

**Supply chain sustainability**

- MTN is aware of the role of our supply chain on our environmental impact. We will continue collaborating with our suppliers and vendors to ensure they uphold strict environmental standards and share our commitment to sustainability efforts.
• We promote ethical procurement, assist suppliers in lowering their environmental impact, and work together to develop sustainable and innovative practices.

**Stakeholder management**

• MTN believes that our stakeholders are at the heart of our success. We will deepen our interactions with stakeholders to increase environmental impact awareness, solicit feedback, and advance education on sustainable environmental practices.

• We continue to be transparent in reporting our environmental performance, objectives, advancements and challenges.

**Roles and responsibilities**

• Our Board, through the Group Social, Ethics and Sustainability Committee, oversees the Group’s actions and performance regarding the environment.

• The Group’s Executive Committee is responsible for policy implementation and identifying, addressing, and remedying environmental risks driven by the Group Chief Sustainability and Corporate Affairs function.

**Applicability and transparent reporting**

• Our Environmental Policy applies to all our directors, officers, employees, and representatives of the Company, whether permanent, temporary or on contract.

• We expect our intermediaries, agents, contractors, suppliers, and business partners to uphold the same standards.

• Our Supplier Code of Conduct outlines the minimum standards, including the environment that each supplier of products or services must comply with.

• We are committed to transparency and disclosure regarding the environment at MTN.

**Communication and training**

MTN’s Environmental Policy is shared with all employees of MTN’s operating entities, subsidiaries and partners. The policy is translated into local languages as required. Detailed training is provided to employees and partners on an annual basis.