

MTN

MTN Group Limited

Transparency Report for the year ended 31 December 2023

Leading digital solutions for Africa's progress

Doing
it right



Welcome to our 2023 Transparency Report

Our purpose is to enable the benefits
of a modern connected life for everyone



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Our reporting suite

Our Transparency Report is supplemented by a number of reports that provide a comprehensive view of MTN's performance and prospects covering environmental, social and governance (ESG) aspects. These reports go beyond traditional financial reporting by integrating sustainability and non-financial information.

Integrated Report



Our primary communication to stakeholders aims to help them make informed assessments of our performance and prospects, strategic direction and the value we create through our activities. It provides a forward looking perspective on MTN's financial and non-financial performance, encompassing strategy, risks and opportunities, targets and governance.

Sustainability reporting

The following suite of reports provides information on MTN's strategy and performance related to sustainability issues with potential impact on our organisation, society and the environment. The reports detail MTN's environmental and social policies, governance, strategies, risks and opportunities. The reports also provide detailed performance data on a wide range of ESG metrics and targets. MTN's sustainability disclosures are structured and informed by the voluntary Global Reporting Initiative (GRI) Standards (2021) and the International Financial Reporting Standards (IFRS) Sustainability Disclosure Standards (IFRS S1 and IFRS S2), which have fully integrated the Task Force on Climate-Related Financial Disclosures (TCFD) guidance. The reports detail MTN's policies, governance strategies, risks and opportunities relating to sustainability considerations.



Sustainability Report



ESG Data Booklet



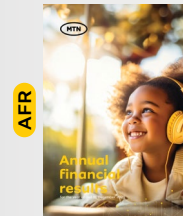
Transparency Report



Climate Report

Financial reporting

These reports include an analysis of the Group's financial results, a five-year review, and MTN's approach to handling uncertain tax positions. They provide insight for current and prospective investors, employees, creditors, analysts and other stakeholders. They disclose details of MTN's income statement, financial position, cash flows, performance per share, as well as key non-financial information.



Annual Financial Results



Annual Financial Statements

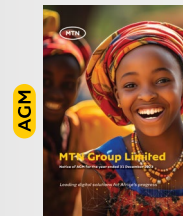


Tax Report



Five-Year Review

Information for shareholders



Notice of AGM

The Notice of AGM and form of proxy give information to shareholders who want to participate in the Group's Annual General Meeting (AGM).



King IV Assessment Report

This provides a summary of the application of the King IV™ principles by MTN Group Limited and Mobile Telephone Networks Holdings Limited.

Regulatory and reporting frameworks used:



Navigating this report

Throughout our Transparency Report, we use the following icons to show the connectivity between our material matters, primary SDGs and creation of shared value.

Material matters

MM 1

Geopolitical and macroeconomic conditions

MM 2

Complex regulatory and tax environment

MM 3

Network and platform performance

MM 4

Financial resilience

MM 5

De-layering of the telecoms business model

MM 6

Greater focus on ESG

MM 7

Future-fit skills and culture

MM 8

Cybersecurity and digital safety

MM 9

Governance, ethics and risk management

MM 10

Artificial intelligence

Other icons and acronyms

Other icons

LA

Limited assurance obtained

www.mtn.com

ISSB

International Sustainability Standards Board

Frequently used acronyms

Opcos

Operating companies

KPIs

Key performance indicators

ESG

Environmental, social and governance

UNSDG

United Nations Sustainability Development Goals

GSMA

Global System for Mobile Communications Association

ICT

Information and communication technology

Ambition 2025 strategic priorities to create value

Build the largest and most valuable platforms

Drive industry-leading connectivity operations

Create shared value

Accelerate portfolio transformation

Sustainability remains **at the core** of our strategy. This aligns with our work to advance the United Nations **Sustainable Development Goals (UNSDG)** through our business activities and our support of governments, communities and customers. The SDGs target a sustainable society with a plan to end poverty, protect the planet and ensure equality for all by 2030. We are committed to bridging the digital divide, furthering financial inclusion to advance the attainment of the goals.

Our primary UNSDG contribution areas for shared value creation

4

QUALITY EDUCATION

5

GENDER EQUALITY

8

DECENT WORK AND ECONOMIC GROWTH

9

INDUSTRY, INNOVATION AND INFRASTRUCTURE

10

REDUCED INEQUALITIES

13

CLIMATE ACTION

16

PEACE AND JUSTICE

17

PARTNERSHIPS FOR THE GOALS

Key indirect opportunities exist in the following SDGs

1

NO POVERTY

2

ZERO HUNGER

3

GOOD HEALTH AND WELL-BEING

6

CLEAN WATER AND SANITATION

7

AFFORDABLE AND CLEAN ENERGY

11

SUSTAINABLE CITIES AND COMMUNITIES

12

RESPONSIBLE CONSUMPTION AND PRODUCTION

15

LIFE ON LAND

Transparency Report 2023 02

About this report

This report provides an overview of MTN's approach to digital human rights strategy and implementation.

MTN is committed to safeguarding and respecting human rights, particularly digital rights. Through our networks, products and services, we aim to facilitate digital communication, positively impact society and uphold privacy and security principles. We ensure compliance with human rights safeguards and promote transparency in our actions and disclosures by publishing our annual Transparency Report.

Basis for preparation

Effective operational oversight is crucial, given our expansive operational reach across 19 markets on two continents. This report covers our 16 markets on the African continent. The data presented in this report is obtained through two primary methods. First, a questionnaire was distributed to our operating markets, prompting them to share information countries in which they operate. This information was derived from internal records, regulatory documents and government sources. Comprehensive details about market-specific laws, regulators and requests were provided by MTN markets and verified by legal counsel, both within each country and at the Group level. The second method involved qualitative interviews with senior staff members, the transcription of these interviews, and a thematic analysis of the data and policies related to digital human rights. This report provides the following disclosures.

Human rights due diligence	Governance of digital human rights in general and privacy and freedom of expression in particular	Commitments, policies and processes we follow when responding to requests from competent authorities	The legal context that provides authorities in each of our markets with the legal basis to make these kinds of requests
Salient digital human rights issues in our operating context, and associated trade-offs	Number of requests received	Number of requests we rejected	Case studies

The report is structured based on the four pillars outlined in the MTN Digital Human Rights Policy:

- Rights and incident management
- Impact management
- Defining our human rights advocacy approach – Responsible advocacy
- Disclosure and performance management

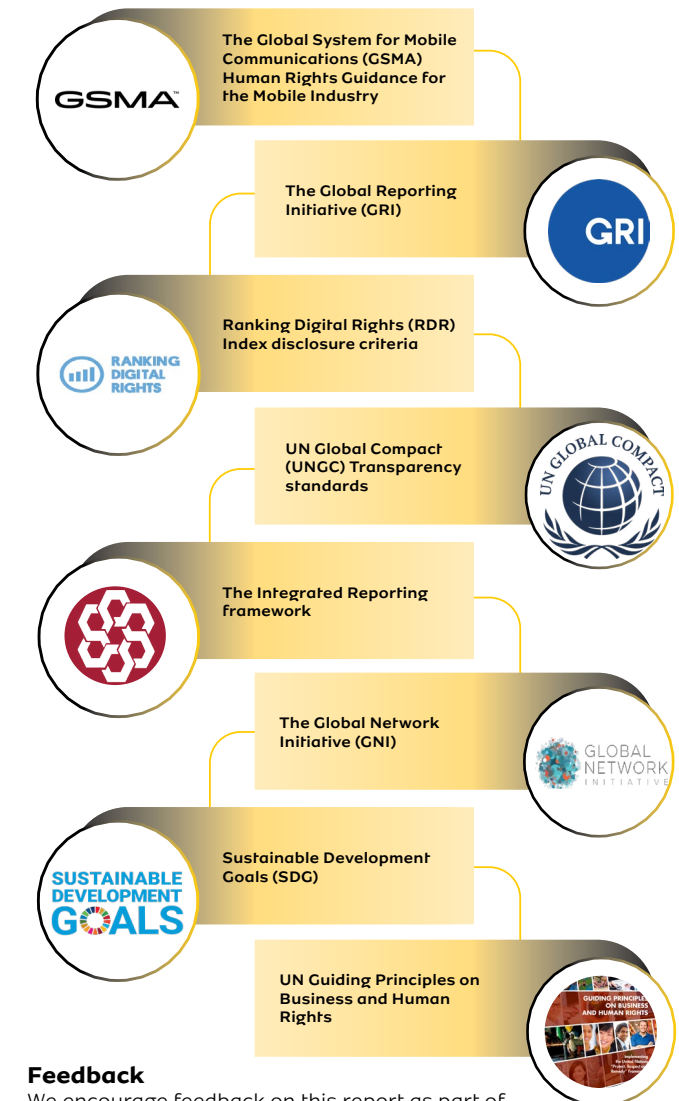
This report includes specific sections on market reports.

Scope and boundary

Timeframe	Markets covered
This report encompasses the reporting period from 1 January to 31 December, 2023. Where feasible, data for the previous two financial years has been included.	The report includes information on our operating markets in 16 countries, namely Benin, Cameroon, Congo-Brazzaville, Côte d'Ivoire, eSwatini, Ghana, Guinea-Bissau, Guinea-Conakry, Liberia, Nigeria, Rwanda, South Africa, South Sudan, Sudan, Uganda and Zambia. MTN Afghanistan is excluded owing to the ongoing phased exit from the country, and Irancell and Mascom are excluded due to indirect minority shareholding without management control.

Reporting standards and guidelines

The following standards and guidelines have been applied to this report.



Feedback

We encourage feedback on this report as part of our commitment to engaging with stakeholders on sustainability and human rights issues. All feedback can be directed to Group Sustainability at humanrights@mtn.com.

Who we are

Our purpose is to enable the benefits of a modern connected life for everyone

MTN is a pan-African digital operator providing a range of critical voice, data, fintech, digital, enterprise and wholesale services to around 295 million customers in 19 markets. Our purpose is embodied in our belief statement that *everyone deserves the benefits of a modern connected life*. Our strategic intent is *leading digital solutions for Africa's progress*.

MTN Group Limited is a publicly owned entity whose shares are traded on the JSE. At the end of 2023 our market capitalisation was approximately R209 billion (US\$11.4 billion). Subsidiaries MTN Nigeria, MTN Ghana, MTN Uganda and MTN Rwanda are listed on the Nigerian Exchange Ltd, the Ghana Stock Exchange, the Uganda Securities Exchange and the Rwanda Stock Exchange, respectively.

Ambition 2025: Leading digital solutions for Africa's progress



Build the
largest and most
valuable platforms



Drive industry-
leading
connectivity
operations



Create shared
value



Accelerate
portfolio
transformation

Enabled by our values:



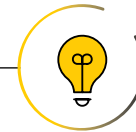
Lead with Care



Collaborate with Agility



Act with Inclusion



Can-do with Integrity



Serve with Respect

Creating value for all

We create value for our stakeholders across our footprint by living our purpose and belief as well as progressing our strategic intent

Reduced GHG emissions by

13.1%[^]

(2022: 13.9%)

(targeting 50% reduction by 2030
and Net Zero emissions by 2040)

Enabled internet
access to

150m

(2022: 137m)
active data users

Facilitated financial
inclusion to

72m

(2022: 69m)
active MoMo users

Extended digital
inclusion to

36m

(2022: 22m)
ayoba users

Provided broadband
coverage to

89.2%

(2022: 88%)
of the population

28%

women in leadership

Maintained female
representation at

40%

Empowered

17 569

MTNers

Connected

295m

(2022: 289m)
subscribers

Added economic value of

~R159bn

(2022: R149bn)
across our markets

Who we are continued

Celebrating 20 years of sustainability reporting

In 2024, MTN celebrates 30 years of doing business in Africa. Since the first call was made on our network in 1994, we have played an instrumental role in transforming Africa's connectivity landscape, bridging the digital divide and empowering millions of lives.

This year also marks the publication of our 20th consecutive annual sustainability report. We are honoured to look back on our journey of growth, innovation and commitment to creating a more sustainable future.

2004

Recognised in UNEP's
Global Top 50 companies
for sustainability reporting



2005

MTN South Africa fully endorsed
the **King Code on Corporate
Governance (King II)**.

2009

Introduced our
whistle-blower line
Tip-offs Anonymous.

2011

MTN established the
**Social and Ethics
Committee**.

2013

MTN obtained limited
**sustainability report
assurance** for the
first time.



2012

MTN aligned with global
standards by joining the
UN Global Compact
(UNGC).



2015

MTN focused on improving
governance and due
diligence processes to
mitigate human rights risks.



2016

MTN drafted its first
comprehensive Group
digital human rights toolkit.
MTN aligns with the **United
Nations' SDGs**.



2020

MTN published its first
Transparency Report.



2017

MTN implemented a
system for child online
safety for through the
**Internet Watch
Foundation (IWF)**.



2021

MTN conducted its first
**digital human rights
impact assessment**.



2022

MTN adopted a revised
digital human rights
strategy.

MTN partnered with IWF to
develop the Online Child
Safety Africa portal.



MTN concluded an
independent digital human
rights impact assessment,
furthering its commitment
to ethical practices.



2023

MTN continues to
improve its digital human
rights policies
and procedures.



MTN receives
recognition from
Brand Finance for the
highest sustainability
perception



Foreword

As stewards of this digital age, we are dedicated to fostering a safe and transparent online environment.

Ralph Mupita
Group President and CEO



Ongoing conflicts and humanitarian crises in regions like the Middle East and Africa continue to place a spotlight on the need to prioritise human rights, including digital rights, as geopolitics, surveillance and restrictions continue to intensify. Navigating this intricate landscape demands utmost care and a steadfast commitment to upholding the fundamental rights and dignity of every individual.

At MTN, we recognise the profound impact of connectivity and emerging technologies on human rights. While these advancements offer limitless opportunities for empowerment and progress, they also present new opportunities, challenges and vulnerabilities. It is our commitment to ensure the benefits of connectivity are enjoyed by all, while mitigating the risks posed by digital exclusion and privacy infringements.

We believe connectivity should not only be accessible, but also inclusive and secure. As stewards of this digital age, we are dedicated to fostering a safe and transparent online environment, where users can freely express themselves, access information and participate in the global community. This commitment extends beyond mere compliance; it is ingrained in our corporate ethos and guides our every action.

Our 2023 Transparency Report encapsulates our journey, highlighting the strides we have made in advancing digital rights, promoting online safety and championing responsible AI practices. Reflecting on the past year, amid a backdrop of heightened geopolitical complexities, MTN has remained steadfast in our commitment to transparency, accountability and ethical conduct.

In 2023, the digital human rights landscape underwent some shifts. Lawful interception and location disclosure requests increased, reflecting heightened security concerns and challenges in regulating privacy. Concurrently, we noted a rise in demands for comprehensive user information, driven by both authorities and individuals. Conversely, criminal investigation requests decreased, indicating relative stability in law enforcement priorities amid evolving cyber threats. Despite these changes, the overarching need for digital rights protection remained constant, with a growing awareness among non-governmental entities, as reflected in reduced civil litigations. The landscape continues to evolve, reflecting the dynamic interplay between technology, law and societal values.

As we look to the future, we are aware of the challenges that lie ahead, especially with the multitude of elections taking place in 2024. These elections play a crucial role in shaping the future of their respective nations and have implications for global dynamics. We approach these challenges with optimism and determination, knowing that our collective efforts can make a tangible difference in the lives of millions.

Collaboration lies at the heart of our approach. By partnering with governments, civil society organisations and industry peers, we amplify our impact and drive meaningful change. Our participation in initiatives such as the Global Network Initiative and the Ministerial programme on Internet Shutdowns underscores our commitment to the global human rights agenda.

In closing, I extend my deepest gratitude to our employees, partners and stakeholders for their support and dedication. Together, we will continue to champion the cause of digital human rights, ensuring the benefits of connectivity are equitably distributed and that the rights of every individual are protected.

Ralph Mupita
Group President and CEO

Where we operate

Our geographic footprint is expansive, stretching over 19 markets on two continents and connecting 295 million customers. This represents the reach and scope of where we create value, organised into our operations in South Africa, Nigeria and our Markets (SEA, WECA and MENA). These are managed through robust operational and governance oversight, which underpins our pan-African growth strategy.



Our financial performance

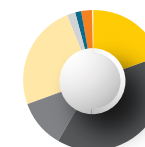
**+13.5%* to
R210.1bn**
service revenue

**+23.0%* to
R84.0bn**
data revenue

**+21.8%* to
R21.0bn**
fintech revenue

EBITDA contribution

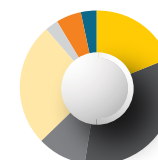
By geography (%)



South Africa	20.7
Nigeria	41.1
SEA	11.7
WECA	25.9
MENA	2.0
Bayobab	1.3
Head offices and eliminations	(2.9)

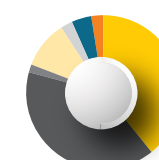
Service revenue contribution

By geography (%)



South Africa	20.4
Nigeria	35.9
SEA	11.0
WECA	27.7
MENA	3.0
Bayobab	5.6
Head offices	(3.5)

By services (%)



Voice	39.4
Data	39.8
Digital	1.7
Fintech	10.0
SMS	2.4
Wholesale	4.2
Other	2.4

**+9.8%* to
R90.4bn**
EBITDA

18.6%
capex intensity

R41.1bn
capex (ex-leases)

Our sustainability strategy

MTN is committed to harnessing Africa's potential and advancing progress by unlocking the full potential of the digital world. Creating shared value is a crucial pillar of our **Ambition 2025** strategy, and we have an authentic belief in our responsibility to create a more sustainable and inclusive world. Our sustainability strategy is supported by a four-pillar framework that aims to create shared value through responsible ESG practices while creating economic value across our footprint. By centring our sustainability strategy on ESG principles, we ensure it is flexible enough to withstand macroeconomic headwinds and prioritise material issues as these emerge.

We believe true progress can be achieved only through action, and we centre our sustainability strategy on the question: *What are we doing today?*

- Each sustainability pillar is complemented by policies and procedures to reinforce our commitment and facilitate implementation by our operating companies (Opcos).
- Our most material focus areas are linked to clear targets and measurable performance indicators while we continue to manage and measure our remaining ESG matters.
- Our sustainability performance is monitored by the Board's Social, Ethics and Sustainability Committee, and our sustainability mandate and integration is reflected across all Board committees.

We closely monitor our ESG performance and continuously work to contribute to solutions that will build an inclusive, connected and sustainable future.

Strategic intent

Ambition 2025: Leading digital solutions for Africa's progress

Belief statement

Everybody deserves the benefits of a modern connected life



Commitments

We are committed to protecting our planet and achieving Net Zero emissions by 2040

We are committed to driving digital financial inclusion and diverse society

We are committed to partners and stakeholders to create and protect value

We are committed to boosting inclusive economic growth on the continent

Metrics and actions

- **Project Zero:** Reduce GHG emissions
- **Efficiency:** Improve energy efficiency
- **Water and waste management:** Reducing our impact

- **Increase access and reduce cost to communicate**
- **Increase financial inclusion**
- **Generational equality: Increase women representation**
- **Contribution through information and communication technology (ICT):** Digital education, skills and jobs

- **Responsible policies and practices:** Business ethics and enterprise-wide risk management
- **Enhance reputation and trust with stakeholders**
- **Digital human rights**
- **Responsible procurement and supply chain**

- **Tax contribution across markets**
- **Network infrastructure investment**
- **Fostering local economic development**

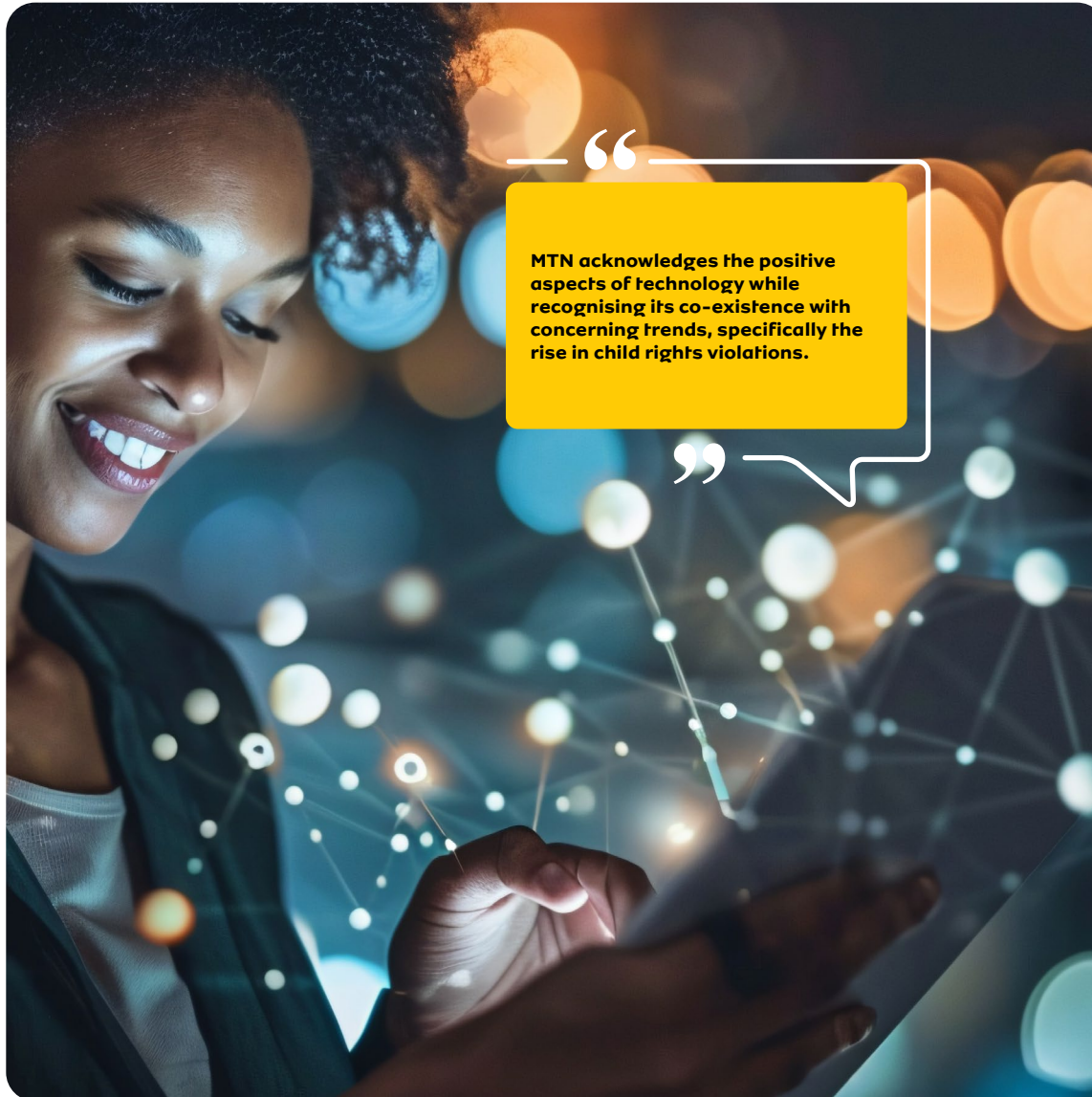
UNSDGs



*2023 performance metrics are available on page 33

Our operating context

MTN operates in the midst of a rapidly growing mobile user base. According to the Global System for Mobile Communication (GSMA), the number of mobile users in Africa is projected to substantially increase, with mobile penetration expected to reach 88% by 2030, a 37% surge from 2023.



This expansion holds the promise of contributing to economic growth and advancing access to human rights.

However, despite the anticipated growth in mobile users, a significant digital divide persists in Africa. The term 'digital divide' refers to socioeconomic and geographic disparities in access to and utilisation of digital technologies, particularly the internet. Barriers such as affordability issues and insufficient digital skills hinder widespread adoption of mobile internet.

As we tackle these challenges, we remain mindful of the positive aspects of technology and its coexistence with concerning trends, such as an increase in child rights violations, including instances of child online sexual abuse and bullying. The proliferation of mobile technology underscores the need for responsible and ethical practices. MTN stays vigilant on issues like child online sexual abuse and bullying, collaborating with organisations like the IWF to address child online protection.

Navigating these challenges and opportunities driven by technological advancements, MTN remains committed to transparency, safeguarding human rights and fostering a secure and inclusive digital environment across all our markets. Our operations span diverse geopolitical landscapes, where regional conflicts and government policies significantly influence our digital rights initiatives. Economic conditions, including currency fluctuations and overall stability, shape our ability to invest in digital infrastructure and uphold user rights. Requests from authorities in different jurisdictions underscore the importance of a nuanced and adaptive approach to regulatory compliance. Despite these geopolitical challenges, MTN continues to navigate the dynamic landscape, staying true to our commitment to digital rights.

In parallel, the mobile ecosystem underwent transformative trends that defined our operating context in 2023. The spotlight was on 5G consumer monetisation, with approximately 30 new markets launching 5G services, particularly in developing regions across Africa and Asia. This global trend accentuated a growing emphasis on the monetisation imperative as 5G adoption scaled. Simultaneously, the industry shifted towards circularity, with sustainability becoming a core strategic priority. The circular model involved sharing, leasing, reusing, repairing, refurbishing and recycling materials for sustainable and energy-efficient network operations. Additionally, the metaverse continued to gain traction, driven by advancements in 5G, AI and wearables, presenting new revenue streams and necessitating innovation and partnerships.

The outlined trends underscore the dynamic landscape in which MTN operates, significantly influencing our approach to digital human rights and transparency reporting.

Digital human rights in our operating markets

MTN supports upholding digital human rights across our diverse markets, aligning with key trends in the mobile ecosystem. We ensure the protection and promotion of fundamental digital rights.

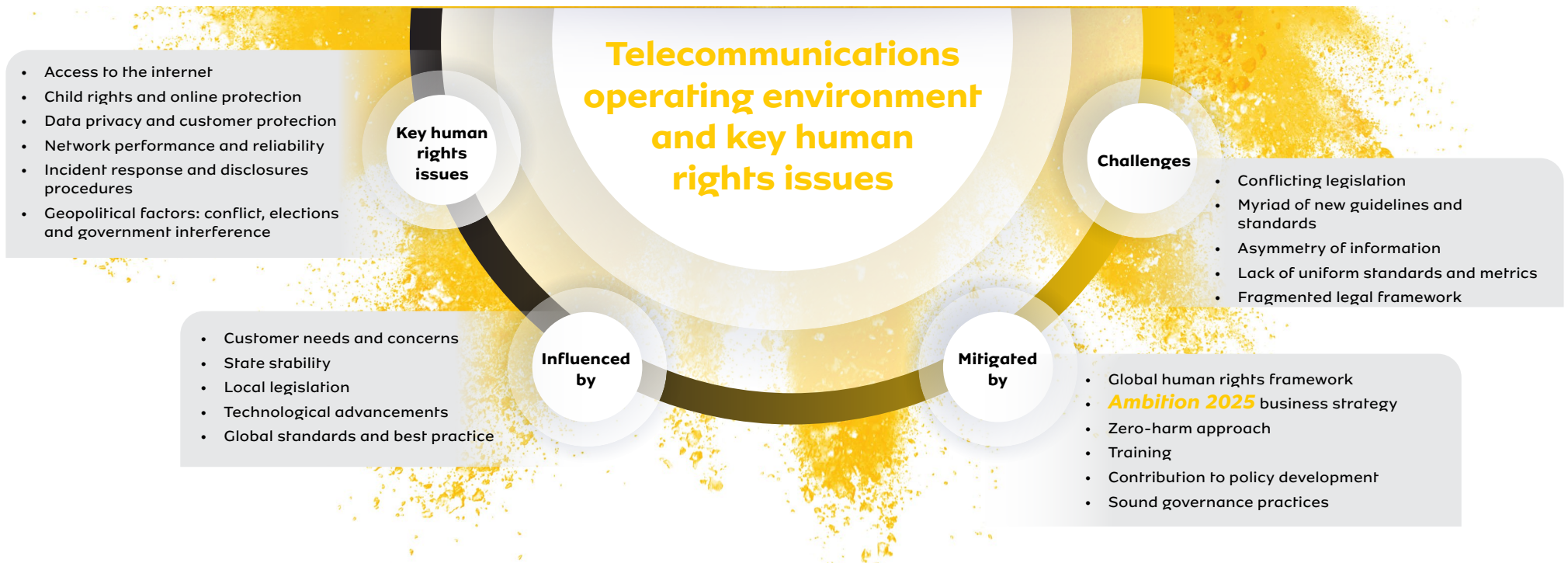
Beyond connectivity, our commitment emphasises online safety, privacy, freedom of expression and responsible AI implementation.

Our commitment extends to fostering inclusivity and equality. Our platform businesses and diverse products and services promote financial inclusion, aligning with our broader mission of leveraging connectivity for socioeconomic development and advancing digital rights.

In collaboration with stakeholders, including regulatory bodies, civil society and suppliers, we contribute to shaping a digital landscape prioritising privacy, fostering online safety and championing responsible AI use. Our ongoing dedication to talent acquisition in emerging technologies keeps us at the forefront of evolving security measures, reinforcing our commitment to digital human rights across our markets.

Looking ahead, MTN will continue contributing to creating an environment where digital rights are respected, online spaces are secure, and technological advancements are approached with responsibility and accountability.

Overview of digital human rights issues



Digital human rights in our operating markets continued

Salient digital human rights issues

MTN respects human rights and seeks to address issues that may undermine digital human rights caused by our business activities and relationships. We prioritise salient digital human rights issues, considering their potential impact on individuals rather than solely focusing on risks to our business. This approach ensures our operations align with ethical practices in accordance with human rights principles.

Compliance with local and international regulations is a key consideration built into all aspects of our operations. We adhere to data protection laws, safeguard consumer rights and strive to comply with all relevant legislation and guidelines within our markets. Our human rights initiatives continuously evolve to address issues such as the use of our services in countries in conflict, threats to free and fair internet access and the ethical considerations pertaining to AI.

In 2023, we identified digital human rights that hold significant relevance within the context of MTN's operations, as elaborated in the following section.

Digital rights



MTN respects and protects customers' digital rights. This involves establishing policies, transparent processes and mechanisms to ensure freedom of expression and addressing privacy concerns.

Online safety



MTN is committed to protecting children from online threats like cyberbullying and inappropriate content. Leveraging emerging technologies such as AI and 5G, MTN employs an integrated approach to child online protection. This includes offering tailored products, embedding parental controls and providing advice and education to build awareness and resilience, empowering children, parents and caregivers for safer online experiences.

Privacy, security and protection



Privacy, security and protection are a priority across MTN's services and operations. These involve identifying risks related to the collection, retention and use of personal information as well as sensitive personal data. MTN adopts privacy-by-design and security-by-design principles, has robust cybersecurity systems, conducts impact and risk assessments, and employs safeguards appropriate to the sensitivity of the user information held.

Freedom of expression



MTN recognises freedom of expression as a fundamental human right. The Group contributes to freedom of expression by empowering users to connect, share and express themselves.

Responsible AI

Ethical practice, transparency and fairness are integral to MTN's AI journey. The Group strives to harness AI's potential while minimising risks, maintaining a commitment to principles that align with digital human rights and ensuring a responsible and ethical deployment of AI technologies across our operations.

Artificial Intelligence, and Generative AI (Gen AI) in particular, has emerged as a key technology with the potential to significantly reshape the nature of business operations and customer value delivery across several parts of the telecommunications value chain. Recent FTI analysis estimates that the global Gen AI market could grow from US\$70 – US\$140 billion today to as much as US\$900 billion – US\$1 trillion by 2030, driven by an acceleration in inference-driven revenue pools. Furthermore, McKinsey Global Survey 2023 on the current state of AI shows that the use of Gen AI tools is spreading rapidly, with 33% of organisations using Gen AI regularly in at least one business function.

MTN Group is taking a disciplined approach to investing in building capabilities, governance, partnerships, and early proof points of value around Gen AI. We recently re-launched our customer service chatbot in MTN Nigeria, Zigi, with an OpenAI-powered capability. Similarly, MTN South Africa released AI-powered SiYa, our employee assistant chatbot, last December.

We are also cognisant of the growing focus on the risks and opportunities associated with AI implementation. Best-practice tips for reporting on AI including highlighting potential risks and opportunities, developing risk management strategies, detailing ethical guidelines, training programmes, data privacy and security protocols, and AI governance practices policy is also a work in progress as part of the Group-wide AI policy development. We have established the AI Steering Committee that is aimed at driving responsible, valuable and consistent AI adoption through a shared AI strategy.

We continue to refine these solutions while monitoring global developments in this space and exploring additional use cases to deliver impact across revenue generation, operational efficiency and cybersecurity among others.

Looking ahead to 2024, we will continue to advance the adoption of AI throughout the Group, focusing on optimising end-to-end customer journeys while ensuring adoption is undertaken in an ethical manner.

Digital human rights in our operating markets continued

Geopolitical factors: Government service restriction orders and internet shutdowns



Geopolitical factors – including government interference, service restriction orders and internet shutdowns, conflicts and election-related issues – pose significant considerations for telecommunication companies operating in diverse markets. MTN emphasises ethical operations, prioritising the respect of human rights and steering clear of involvement in activities that could fuel unrest or rights violations. This commitment involves proactive risk assessments, conducted even before a crisis occurs, and a responsive approach entailing the formulation of specific policies, services and operational actions aimed at upholding human rights.

The global cost of internet shutdowns

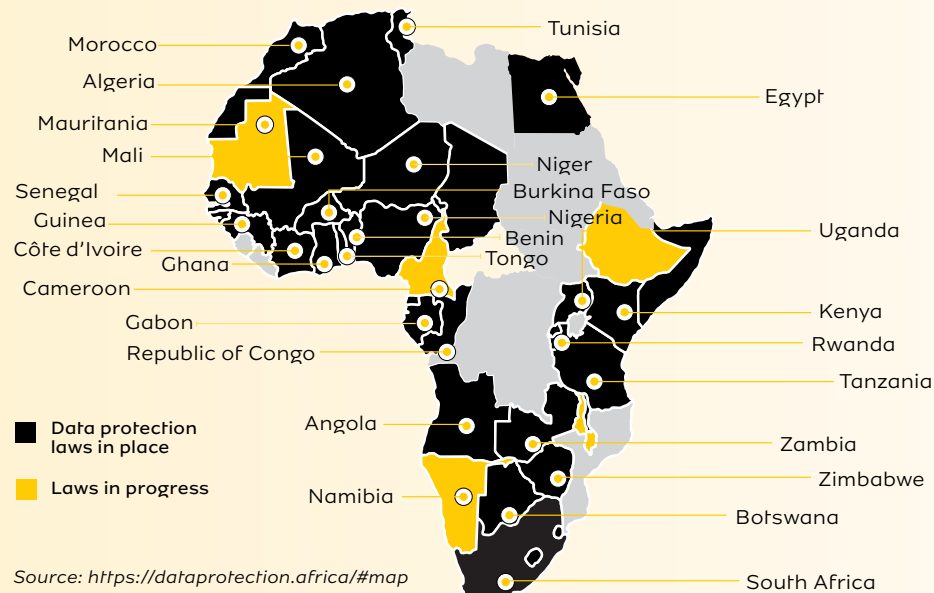
In 2023, deliberate internet shutdowns incurred an economic cost of US\$9.13 billion, with 196 significant self-imposed outages spanning 25 countries in the sub-Saharan context, the cost was estimated at \$1.74 million. Government interventions disrupted internet services for a total of 79 238 hours, comprising 25 535 hours of internet blackouts and 53 703 hours of social media blocks. Approximately 747 million individuals bore the brunt of intentional internet disruptions, with Twitter (X) being the most targeted social media platform, enduring 10 683 hours of deliberate disruption – 18% more than Instagram and 26% more than TikTok.

The human rights impact was significant, with 50% of government-induced internet outages in 2023 associated with additional human rights abuses, predominantly restrictions on freedom of assembly. Such intentional disruptions not only infringe on citizens' digital rights, but also represent acts of extreme internet censorship, resulting in national economic self-harm.

Source: This Global Cost of Internet Shutdowns Report (2023).

Region	Total cost	Duration (hours)	Internet users affected
Europe	US\$4.02 million	1 365	182.95 million
Asia	US\$1.85 million	30 478	180.1 million
Sub-Saharan Africa	US\$1.74 million	30 785	848 million
MENA	US\$1.44 million	16 547	105.04 million
South America	US\$79.9 million	62	192.04 million
North America	US\$1.7 million	2	7.99 million

Countries with data protection laws



Over the past two decades, African states have been adopting data protection laws, with the number increasing rapidly since 2016. As of the end of 2023, 36 countries within the continent have data protection laws, and three countries have draft laws. The latest countries to put data protection laws in place are Nigeria and Somalia.

Michalsons Giles Inc, a legal firm specialising in practical legal solutions, has conducted a comprehensive review of data protection laws in various African countries. The report sheds light on critical considerations, including:

- The permissibility of transferring personal information to specific countries.
- The existence and adequacy of data protection laws.
- The restrictions on data transfer out of African countries.
- Prohibitions on the use of operators or data processors, and the accompanying requirements imposed on them.




The report underscores the importance of tailoring global and regional data protection compliance programmes to align with the specific laws of each country where personal data is processed, ensuring a proactive approach to compliance.

These findings are relevant for MTN, providing insight into the Group's diverse regulatory landscape across the African continent. Effectively addressing these issues will enable MTN to navigate compliance obligations, mitigate potential legal risks and safeguard against criminal and civil sanctions for violations.

Digital human rights in our operating markets continued

Trade-offs to be managed in protecting digital human rights

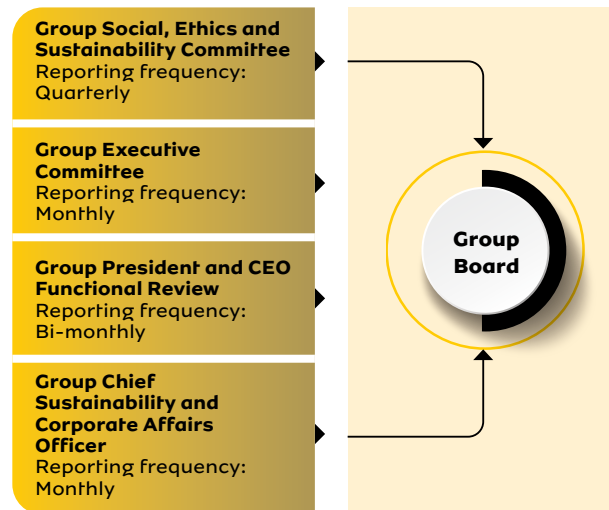
Navigating the intricacies of digital human rights requires acknowledging the delicate balance between various considerations. In this section, we explore the trade-offs that MTN encounters in our commitment to upholding digital human rights. These trade-offs involve weighing gains against potential drawbacks and implementing mitigation strategies to strike a harmonious balance. Each trade-off underscores MTN's dedication to fostering responsible corporate citizenship and contributing to a secure and inclusive digital environment while addressing the evolving challenges of operating in diverse markets and safeguarding user rights. As MTN navigates these trade-offs, our commitment remains steadfast in upholding digital human rights, fostering responsible corporate citizenship and contributing to a secure and inclusive digital environment.

	Gains 	Trade-offs 	Mitigations 
Balancing privacy and security	Striking the right balance between ensuring user privacy and maintaining robust security measures.	Navigating the tension between user privacy and the necessity for stringent security measures.	Continuous refinement of encryption techniques, adherence to legal requirements and transparent communication about security measures.
Content moderation versus freedom of expression	Ensuring platforms are free from content that may cause harm, such as hate speech or misinformation.	Striking a balance between removing harmful content on our network in line with MTN policy and best practice, and respecting users' rights to freely express themselves.	Implementing robust content moderation policies, AI-driven tools and mechanisms for users to appeal content decisions.
Data retention periods	Recognising the operational necessity of retaining user data for various legitimate purposes, including service improvement and security.	Finding the optimal balance between the operational requirements of retaining data, respecting users' rights to privacy and complying with applicable laws.	Defining reasonable retention periods, transparent communication with users and adhering to data protection regulations. In line with MTN's Position Statement on Data and Protection, MTN may retain customers personal information for as long as required to provide customers with products and services or as otherwise permitted under applicable law. When we dispose of our customers personal information, we use appropriate procedures to erase it or render it unreadable/anonymised.
Access to user information for law enforcement	Acknowledging the importance of providing necessary information to law enforcement agencies for criminal investigations and ensuring public safety.	Striking a delicate balance between fulfilling lawful requests from law enforcement and safeguarding the privacy rights of users.	Establishing clear protocols for lawful requests, minimising overreach and modifying users where there is a data breach.
Network neutrality versus traffic management	Upholding net neutrality principles ensures all online services are treated equally, preventing discriminatory practices that may favour certain content or service providers.	Addressing network congestion and ensure optimal service quality. This may require prioritising certain services or data traffic, potentially deviating from strict net neutrality principles.	Prioritising critical services such as emergency calls and essential communication to ensure they receive the necessary bandwidth and are not adversely affected by network congestion while avoiding discriminatory practices and ensuring fair access for all users.
User consent and data collection	Enhancing user experience by using embedded processes for seeking consent which allows us to deliver services and provide tailored solutions that meet individual needs.	Ensuring user consent is informed, voluntary and transparent while minimising the collection of unnecessary data. This trade-off involves the tension between providing personalised services and safeguarding user privacy.	Clearly explaining data collection practices, providing opt-in/opt-out choices and minimising data collection to essential information.
Localisation versus global standards	Operating in diverse markets with varied legal frameworks requires MTN to comply with local laws, fostering smoother operations and better relationships with local authorities.	Developing policies that align with local legal requirements and cultural nuances, which may differ across jurisdictions. Striking this balance can be intricate and may involve compromises.	Developing policies that respect cultural and legal differences, and actively participating in global conversations on human rights standards.
Collaboration with governments versus user advocacy	Advocating independently for user rights showcases a commitment to protecting user interests, privacy and freedom. It allows MTN to be a vocal advocate for principles aligned with human rights, even if they might differ from certain government perspectives. This approach allows MTN to have a seat at the table when policies are being shaped. It provides an opportunity to contribute industry expertise, align regulatory frameworks with business goals and proactively address potential challenges.	Engaging with governments often involves compromise, and this trade-off is about navigating the delicate balance between aligning with regulatory requirements and advocating for user rights. There can be tension between adhering to governmental regulations and championing the rights of users, requiring careful negotiation.	Maintaining transparent dialogue with regulators, supporting user education and empowering users to understand and protect their rights.

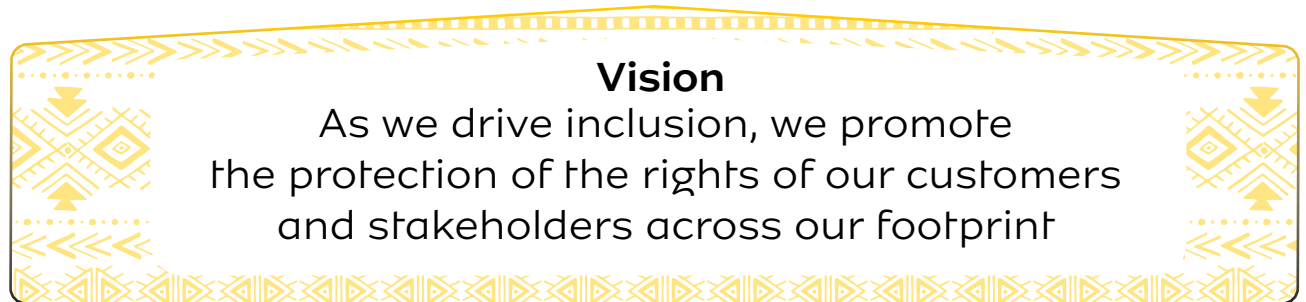
Governance and decision framework

MTN is committed to the highest standards of governance, ethics and integrity, which are essential for sustained value creation and safeguarding digital human rights. Oversight of sustainability, including digital human rights, is managed by the Group Social, Ethics and Sustainability Committee on behalf of the MTN Group Board. The Group Executive Committee, led by the MTN Group President and CEO, actively monitors these sustainability efforts. Regional vice-presidents and country CEOs play vital roles at their respective levels in ensuring effective governance.

Our sustainability governance and reporting structure



Overview of the digital human rights strategy



MTN Digital Human Rights Policy



Our digital human rights framework

MTN has developed a comprehensive digital human rights strategic framework aligned with **Ambition 2025**. This framework outlines clear responsibilities for protecting digital human rights and underscores MTN's commitment to managing issues across its business and platforms. Upholding the principles of Protect, Respect, Remedy, the framework covers rights and incident management, impact management, responsible advocacy and disclosure and performance management.

Our approach

MTN adopts a collective and Group-wide approach to human rights, emphasising collective responsibility and leveraging strengths across the organisation. The digital human rights strategy includes governance mechanisms such as standard operating procedures, scenario playbooks, decision matrices, advocacy opportunities, capacity building for stakeholders, strategic memberships, impact assessments, risk management, transparency reporting, ranking digital rights and disclosure and performance management.

The sustainability governance and reporting structure, encompassing the Group Social, Ethics, and Sustainability Committee, the Group Executive Committee, the Group President and CEO, and the Group Chief Sustainability and Corporate Affairs Officer, reflects MTN's commitment to regular reporting and oversight. This commitment extends to the MTN Digital Human Rights Policy, which aims to safeguard the rights of customers and stakeholders across our operational footprint.

Governance: Rights and incident management continued

Pillars of the guiding principles

PROTECT

The State has a duty to protect against human rights abuses by third parties, including businesses.

Enforcement measure

Implementation of effective national laws and regulations to prevent human rights abuses.

RESPECT

Business has a responsibility to respect human rights throughout their operations.

Enforcement measure

Conducting human rights due diligence to identify, prevent, mitigate and account for potential impacts.

REMEDY

Access to effective remedies for those affected by business-related human rights abuses

Enforcement measure

Promoting access to justice and effective remedies for victims.

MTN's memberships and adherence to human rights standards

MTN proudly aligns itself with reputable international bodies, demonstrating a commitment to ethical practices and global best practices. As a member of the UNGC, the Global Network Initiative (GNI), and the Global System of Mobile Communications Association (GSMA), we actively engage in sustainability networks, data protection initiatives and internet security forums. Our adherence to internationally recognised standards reflects our dedication to upholding human rights and ethical conduct.

MTN further embraces guidelines such as the African Union Convention on Cybersecurity and Personal Data Protection, the ECOWAS Supplementary Act on Personal Data Protection (2010), and the SADC Model Law on Data Protection, reinforcing our support as a responsible corporate citizenship in addition to specific in-country data laws.

MTN Digital Human Rights Policy

MTN recognises the widespread human rights risk inherent in our value chain and upholds the fundamental rights of internet access, freedom of expression, privacy and information security. Our Digital Human Rights Policy is aligned with international principles, emphasising our dedication to upholding and respecting these rights.

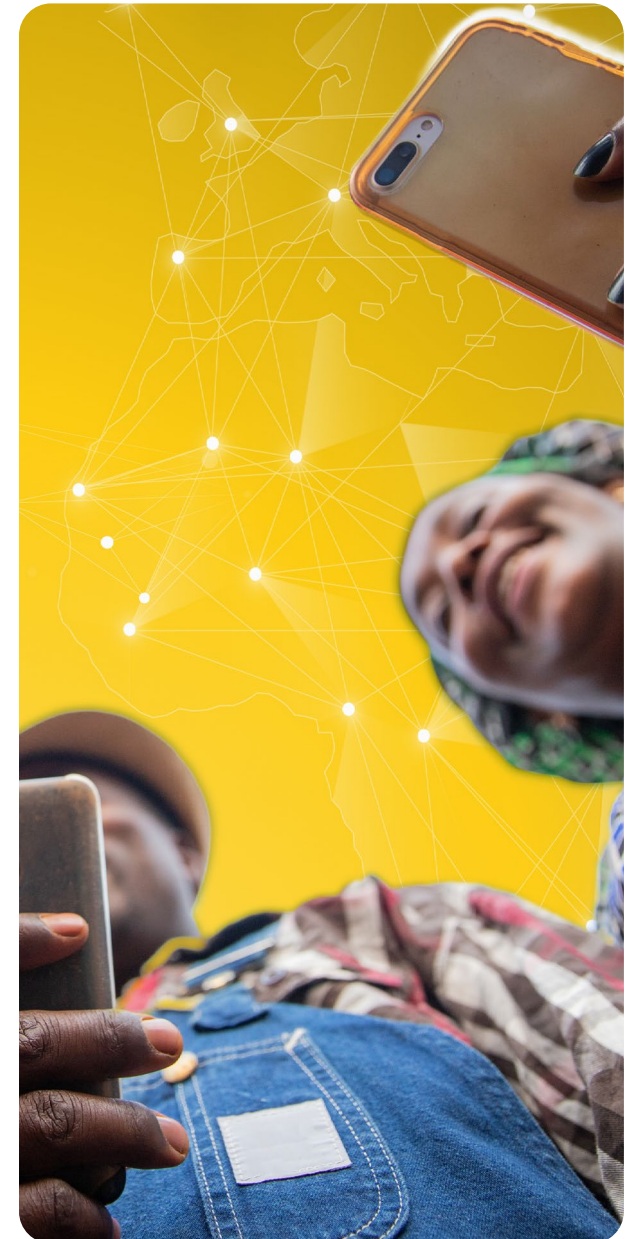
Application of our Digital Human Rights Policy

Our Digital Human Rights Policy applies to all our directors, officers, employees and representatives, whether permanent, temporary or on contract. The policy also extends to our suppliers, agents, business partners and intermediaries. Applied universally across the Group, the policy is tailored at Opco level to address country-specific requirements.

We are dedicated to continuous improvement, consistently evaluating our practices and updating policies to align with evolving international standards. This extends to providing regular training to our staff and partners, specifically tailored to their roles and impact on human rights. Doing so ensures our approach remains dynamic and responsive to emerging challenges. This commitment to refinement and adaptability underscores our dedication to upholding global standards and recognising the importance of local nuances.

Digital human rights due diligence framework

MTN seeks to prevent adverse human rights impacts and employs a proactive approach when identifying risks that may violate these rights. Aligned with the UN Guiding Principles, our due diligence framework systematically addresses pre-, during, and post-incident stages, providing a uniform response to requests impacting freedom of expression, data privacy and information security. The framework offers a structured process for teams to respond to incidents, ensuring a clear and defined approach, including identification and implementation of remedies for affected customers. This iterative approach is adaptable to the dynamic landscape of evolving technology, regulations and socio-political contexts.



Our digital human rights due diligence process approach

Our digital human rights due diligence process approach

1

Before Proactive management

- **Evaluating risks and impact:** Bimonthly reviews are conducted on digital human rights risks and mitigation plans. Impact assessments are conducted on an annual basis.

- **Engaging stakeholders:** Ongoing engagements with stakeholder on digital human rights and related matters.

2

During Proactive management

- **Managing requests or incidents:** MTN adopts a considered approach in determining its response to requests from authorities and non-governmental entities. This includes:
 - › Evaluating requests that may impact freedom of expression, access to information or customer privacy, assessing the regulatory authorisation of the requesting entities and ensuring compliance with prevailing regulatory processes.
 - › Engaging with relevant stakeholders for guidance before responding to requests, seeking clarification, requesting amendments or urging the dismissal of requests where possible. Requests are reviewed in accordance with the laws and regulatory requirements of the countries of operation, considering international laws as well.
 - › Assessing potential risks to employee safety and operational continuity before deciding to reject, partially or fully comply with the request. The decision is based on due diligence, regulatory and risk management principles and the laws of the relevant country.

- **Mitigating the impact of disruptions:** MTN communicates with affected parties based on applicable law to safeguard employees, customers and partners. We also ensure the integrity of our infrastructure is maintained during disruptions.
- **Situational stakeholder engagement:** MTN actively engages with various stakeholders to gather perspectives, identify potential mitigations and manage situations effectively. Grievances can be reported through in-country customer complaints lines or via email to humanrights@mtn.com.

3

After Post-incident management

- **Record-keeping:** MTN maintains a comprehensive trail of evidence related to relevant events, decisions and actions. This facilitates corporate learning and enables us to retain the information and evidence required for stakeholder engagement and reporting.
- **Remedies for affected customers and stakeholders:** MTN is committed to providing remedies to customers negatively impacted on a case-by-case basis. We actively work towards addressing the specific concerns and needs of affected individuals, ensuring a tailored and responsive approach to remedy the impact.



Digital human rights due diligence framework

Complying with legislative requirements

MTN operates within the legal and regulatory frameworks of all its operating markets. Business operations are conducted with a focus on protecting customers' rights to privacy and freedom of expression. We are committed to regulatory compliance, recognising that non-compliance with regulatory frameworks may lead to fines, sanctions and even licence revocation. We conduct business with the following objectives in mind:

- Protecting our customers' rights to access information and express themselves online.
- Good data governance.
- Providing secure communication services in the jurisdictions of our operating markets.

To address potential human rights risks associated with granting or denying requests, MTN diligently evaluates each situation, considering legal validity, necessity and proportionality in line with international and local human rights laws. Seeking additional legal counsel ensures thorough examination, especially in cases where laws or licence conditions are ambiguous or conflict with international standards.

Reasons why MTN would comply:

- Adherence to a lawful request by an authorised public body, in accordance with governing legislation.
- Support for regulatory proceedings conducted by a competent authority.
- Compliance with lawful purposes related to licence and regulatory obligations.

MTN recognises the compliance risks associated with our operations, emphasising the need for vigilant management. These risks include the potential violation of human rights, which may lead to severe consequences such as loss of life, and security threats to staff, offices and infrastructure. Additionally, compliance risks encompass possible litigation, reputational damage and backlash from civil society. We are committed to proactive risk mitigation measures to address and minimise these risks, safeguarding our integrity and maintaining our reputation as a responsible corporate citizen.

Compliance risks:



- Violation of human rights.
- Loss of life.
- Security risk to staff, offices and infrastructure.
- Possible litigation risk.
- Reputational risk.
- Backlash from civil society.
- Business disruption.
- Data breaches.
- Non-compliance with international standards.

Non-compliance risks:



- Non-compliance with licence conditions, leading to loss of authorisation to operate.
- Expulsion, deportation and imprisonment of personal harassment of staff and relatives.
- Inability to enforce and comply with contracts.
- Exposure to legal action, lawsuits and fines.
- Breakdown in relationship with authorities.
- Violation of human rights owing to users being prevented from accessing services.
- Difficulty in attracting and retaining talent.
- Regulatory scrutiny and increased oversight.

Human rights-related policies, processes and position statements

Our human rights-related policies, processes and position statements underscore our dedication to transparency and ethical practices. Each policy is carefully crafted, endorsed by our leadership and informed by internal and external expertise aligning with our commitment to openness and accountability.



Our policy statements are publicly available

<http://www.mtn.com/our-positions-certifications/?tablink=2sustainable>

Data privacy and protection



The Data Privacy and Protection Policy clearly articulates our commitment to data privacy and protecting our stakeholders. We comply with applicable data protection laws when collecting, processing, storing and disclosing personal information. This commitment is part of a comprehensive privacy and data protection initiative at MTN, aligning with internationally recognised standards such as ISO/IEC 27001:2013, Critical Security Controls (CSC), National Institute of Standards and Security (NIST) Cybersecurity Framework, General Data Protection Regulation (GDPR), Protection of Personal Information Act (POPIA) and King IV™* on Corporate Governance. To support internal compliance monitoring, an information officer and deputy information officer have been appointed, guiding data privacy, protection and establishing clear procedures for reporting personal information breaches.

Political contributions



MTN is dedicated to transparent and responsible engagement in political party funding, supporting stable democracies and digital human rights across our markets. This commitment is clearly outlined in the Group's Political Contributions Policy, which prioritises transparency, accountability and responsible engagement.

The policy establishes explicit guidelines to mitigate potential risks, emphasising adherence to international standards while committing to operate within legal and ethical boundaries. Recognising key risks, such as reputational damage, legal consequences and erosion of trust, the policy serves as a safeguard by providing a principled framework for political engagement.

This approach aligns with MTN's broader commitment to fostering stable democracies and preserving digital human rights throughout our markets.

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Digital human rights due diligence framework continued

Information security



MTN is dedicated to enhancing information security across all our operations. We achieve this through strict adherence to the MTN Group Information Security Policy. This policy outlines the necessary measures for safeguarding MTN's information, systems and personnel, drawing guidance from industry-leading practices like the NIST Cybersecurity Framework and ISO/IEC 27001:2013.

Treating customers fairly



MTN delivers an exceptional customer experience by prioritising and fulfilling customer needs and expectations. This extends to protecting customers and ensuring fairness during interactions with our products and services. To uphold these principles, we have established a comprehensive policy and framework designed to ensure equitable treatment for our customers, promoting transparency and empowering them with control.

Zero rating



MTN's approach to zero-rating content demonstrates our support for balancing business considerations with the core principles of inclusivity and accessibility.

Responsible marketing



MTN has established a Responsible Marketing Policy. This policy serves as a guiding framework to ensure our marketing efforts are accurate, appropriate and inclusive. In adherence with global standards and legal requirements in each of our markets, we strive for ethical marketing practices across diverse media platforms, promoting transparency and avoiding content that may incite violence, discrimination or harmful stereotypes. Our policy extends to interactions with third parties and the handling of personal data. This policy is communicated comprehensively to employees and partners, reinforcing a culture of responsible marketing within the Group.

Whistle-blowing



MTN has a zero-tolerance approach to fraud, bribery, corruption, theft and illegal activities. The Group has established procedures for safe and anonymous reporting of any fraudulent or illicit behaviour by employees and other stakeholders. Whistle-blowing is viewed as a positive practice that aids in promptly identifying misconduct, thereby enabling MTN to mitigate financial and reputational risks. We encourage employees to report fraud, bribery, corruption or misappropriation through established reporting mechanisms, assuring protection from retaliation for those reporting incidents in good faith and without malice.



Information security

CASE STUDY

MTN Nigeria responds to cybersecurity threat amid geopolitical tensions



In 2023, hackers launched cyber-attacks on Nigeria's vital information systems. MTN Nigeria's cybersecurity measures were mobilised to limit the hacking attempts and the impacts on users.

Following the incident, financial service providers, telecommunication providers and government service providers were advised to enhance their cybersecurity readiness in response to a potentially evolving situation.

The incident highlighted the growing intersection of cybersecurity and geopolitical events, underscoring the need for vigilance and sustained investment in cybersecurity infrastructure within our markets.

The incident also showcased the resilience of MTN's cybersecurity infrastructure and demonstrated the outcomes of our investments in advanced systems and fortified firewalls to ensure the continuous protection of our network.



Q&A with Justin Williams, Executive: Group Information Security

Q
**What types of systems does MTN have in place?
How did they assist during the cyber-attack that took place in Nigeria?**

A
As a telecommunications and digital platforms provider, MTN provides infrastructure and services that are critical to the operation of many countries and the daily lives of their people, our customers. This makes ourselves and similar organisations targets for attack.

MTN has a layered series of defensive technologies in place to protect our systems against numerous types of attacks to maximise availability of services and ensure security for our customers. These are deployed both at a country level and centrally within the MTN Group.

These platforms enable us to obtain advance warning of pending threats and then identify and remediate attacks as they may happen, minimising potential disruption.

Q
Are you seeing an evolution of the types of cyber-attacks taking place on the continent? How is MTN adjusting its approach to cater for these changes?

A
We see many different classes of threat actors in operation across the continent, each having their own motivation and objectives. The attackers will vary their targets and constantly evolve their methods to achieve their goals. We have to make certain we are always vigilant and work with our technology providers to the defence methods evolve with the attacks.

Q
What types of proactive measures do you think operators across the world should invest in?

A
Operators need to have a comprehensive security programme in place, which identifies the specific risks for their environments and customers, and then on a risk-prioritised basis, make the necessary investments to deploy and maintain the defence mechanisms. This will vary from traditional network defences such as Unified Threat Management Next Gen IP firewalls, through telecommunications-specific signalling firewalls covering protocols such as SS7 and Diameter. International frameworks such as the NIST Cybersecurity Framework and the GSMA Baseline Security Controls (FS.31) assist in guiding these. The sharing of information between the telecommunications operators through forums such as the GSMA Telecommunication Information Sharing and Analysis Centre (T-ISAC) is increasingly becoming important for the collective defence of the industry.

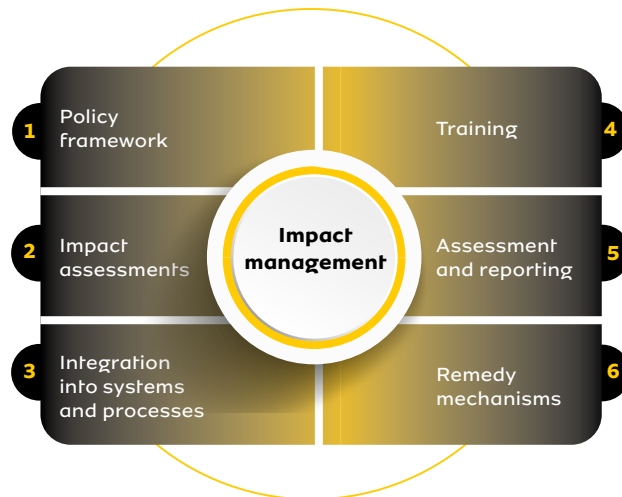
Digital human rights impact assessments

MTN has implemented a comprehensive impact management process focused on identifying, preventing, mitigating and addressing our business' potential and actual impacts on human rights. Conducted regularly in collaboration with external human rights experts, our digital human rights impact assessments (DHRIA) serve as a cornerstone, evaluating the effects of our activities, business relationships and services on all human rights. This process enables us to pinpoint salient human rights issues pertinent to our operations. Building on the DHRIAs, we conduct risk assessments across all Opcos to comprehend local and thematic risk factors.

Our commitment to upholding human rights is enshrined in a comprehensive digital human rights framework. We prioritise extensive training programmes to instil awareness and understanding of human rights principles among our employees, business partners, suppliers and agents. Ongoing assessments and transparent reporting mechanisms underscore our dedication to accountability and continual improvement. Additionally, our whistle-blowing channel offers a confidential and anonymous avenue for stakeholders to report complaints or queries related to digital human rights.

Risk management and impact assessment

MTN employs a systematic approach to identify and mitigate potential human rights infringements from our business activities. This process involves thoroughly examining scope, scale and remedy mechanisms, ensuring a holistic understanding and effective response to potential adverse effects. We believe this commitment aligns with our core values and plays a pivotal role in fostering a responsible and accountable business environment.



Scope: How many individuals could be impacted by the adverse effect?

Scale: How severe would the victim's adverse effects be?

Remediability: Will the remedy return the victim to the same or comparable position as before the harm?

Identifying the actions required for the business to migrate negative impacts

* Depending on the digital human right affected by an action, there may be no remedy (or possible way to return the victim to the previous or comparable position).

Digital human rights impact assessments continued

Digital human rights impact assessment and toolkit

In 2021, MTN partnered with BSR, a sustainable business network and consultancy, to conduct DHRIA across seven Opcos. The DHRIAs focused on evaluating human rights risks associated with the use of MTN's products and services, excluding supply chains. They identified key areas for MTN to concentrate on, including capacity building, stakeholder engagement, product and business model development, as well as business model due diligence and transparency. A significant outcome of these assessments is the development of a DHRIA toolkit, designed for continuous human rights due diligence across all markets. The toolkit includes specialised tools for product evaluation, operating market assessment, responsible entry and exit, as well as mergers and acquisitions.

In 2023, MTN used the DHRIA toolkits to conduct four impact assessments in Côte d'Ivoire, eSwatini, Uganda and South Africa. These assessments aimed to ensure MTN's up-to-date understanding of digital human rights impacts and active efforts to address mitigation measures.



Issue	Description	2023 achievements
Capacity building	Provide Opcos with human rights training, guidance and resources, such as rehearsals, scenario planning and opportunities to participate in GNI events and dialogue.	MTN is committed to enhancing ethical operations, responsibility and compliance with human rights principles across our Opcos. In 2023, MTN South Africa conducted digital human rights capacity building, reaching five employees.
Stakeholder engagement	Take a strategic approach to establishing stakeholder relationships that facilitate the early identification of human rights risk and a proactive approach to addressing these.	MTN prioritises the establishment of stakeholder relationships to proactively identify and address human rights risks. By joining the GNI, MTN gained valuable assistance in respecting freedom of expression and privacy rights. This collaboration provides opportunities for engaging with diverse stakeholders, enriching our digital human rights approach, fostering peer learning and influencing emerging policies.
Product and business model development	Work to continuously ensure product and business model development remove bias in data analytics, monetising data or facilitating hate speech and disinformation.	Digital Human Rights Policy was localised, updated and approved, emphasising the ongoing commitment to removing bias in data analytics, monetising data responsibly and preventing the facilitation of hate speech and disinformation.
Business model due diligence	Anticipate, prevent and mitigate potential human rights risks posed by the Ambition 2025 strategy.	MTN is dedicated to ensuring our product and business model development aligns with human rights principles. In this regard, MTN conducted an exit human rights impact assessment for Afghanistan in 2023.
Transparency	Provide additional insight into the regulatory and licensing context (where legally permissible) and continuously publish deeper insight into MTN's actual experience with self-regulatory organisations (SRO), such as through case studies.	MTN prioritises transparency by offering additional insight into the regulatory and licensing context, within legal boundaries. We share comprehensive details about our experiences with SRO. This commitment to transparency is underscored by case studies featured on pages 22, 23, 24 and 27 of this report. These case studies, highlighting our responses to the elections in eSwatini and addressing a cyber-attack in Nigeria, provide insight into our approach to upholding human rights across varied operational scenarios.

Case study: South Africa

Case study

MTN South Africa's staff capacity building on digital human rights



The digital human rights training provided by the Sustainability and Shared Value team was not only interesting and informative, but contained valuable insight, which can be used on a practical level by any MTNer. The training provides useful tools that empower you to adequately address the requests/proposals of governments and regulators in matters involving digital human rights. It is particularly useful for regulatory teams that deal with rapidly developing laws in our dynamic industry, which have an increasing effect on the human rights of our customers. The training is easily understood and encourages engagement with the material.

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Bianca Gil
MTN South Africa



In 2023, MTN South Africa implemented a staff training programme. Guided by the principles outlined in the digital human rights toolkit developed in partnership with BSR, the training equipped employees with essential knowledge and ethical guidelines on digital human rights.

The training incorporated several scenario analyses, providing employees with the tools needed to anticipate and respond decisively to potential human rights incidents. The toolkit served as a valuable resource, offering contextual information, outlining strategies and detailing the digital human rights due diligence process.

MTN South Africa's proactive stance on human rights capacity building underscores the Group's commitment to fostering a corporate culture that prioritises human rights in the digital sphere. By providing employees with relevant tools and knowledge, MTN South Africa contributed to creating a free and fair internet accessible to all.

Case study: eSwatini

Case study

eSwatini election preparedness



“It has been an incredible milestone to collaborate with the government to provide connectivity in the recent elections. Our connectivity powered the app, which enabled the public to follow the results in real time and guaranteed efficient voting. MTN is grateful and committed to creating a digital future for the Kingdom.”

Sibusiso Nhleko
Head: Corporate Services
MTN eSwatini



In 2023, MTN eSwatini took a proactive stance to address potential digital human rights violations during the parliamentary elections. The Opco's election preparedness plan was strategically crafted to mitigate risks, anticipating a scenario in which the government might request service restrictions or an internet shutdown, similar to the one instituted in 2021.

MTN eSwatini sought to balance corporate responsibility with potential pressures from the government and initiated a comprehensive risk assessment, leading to the development of an action plan that included a refresher course for its response team, a communication strategy and pre-election stakeholder engagement.

As eSwatini approached parliamentary elections, the Opco updated its human rights impact assessment to specifically address potential disruptions related to the electoral process. Despite the low assessed risk for these elections, MTN eSwatini prioritised proactive measures, placing emphasis on transparency, stakeholder engagement and strategic post-incident management.

The Opco's commitment to protecting digital human rights, particularly during critical periods like elections, underscored MTN's dedication to ethical business practices and responsible corporate citizenship.

Q

How did your election preparedness processes contribute to MTN eSwatini's efforts to safeguard digital human rights?

A

Our election preparedness processes were crucial in ensuring smooth operations during the electoral period. Through comprehensive risk assessments and engagement with all key stakeholders, we were able to identify potential challenges and address them proactively. This proactive approach allowed us to mitigate risks effectively and ensure our infrastructure remained resilient, ultimately facilitating uninterrupted connectivity essential for the electoral process.

Q

Please elaborate on the strategies and effectiveness of stakeholder engagement in ensuring smooth operations during the electoral period.

A

Engagement with stakeholders played an important role in our election preparedness efforts. Internally, collaboration among various teams, including risk and compliance, as well as technology communities, ensured a co-ordinated approach to addressing potential risks and challenges. Externally, engagement with government bodies, such as the Ministry of ICT and regulatory authorities, provided reassurance and facilitated co-ordination efforts. Additionally, close collaboration with the electoral commission ensured alignment and support in providing connectivity for the electoral process.

Q

What key lessons learnt from your election preparedness processes can be shared with other markets to enhance their approach to safeguarding digital rights at electoral events?

A

Several lessons from our election preparedness processes can be valuable for other markets facing similar challenges. Firstly, prioritising proactive risk assessment and engaging with stakeholders is essential for identifying and mitigating potential risks effectively. Secondly, ensuring clear internal communication and delineating roles and responsibilities in crisis situations are critical for swift and effective decision making. Lastly, fostering a culture of preparedness and awareness internally ensures all stakeholders are equipped to respond effectively to unforeseen events, ultimately contributing to the resilience of electoral processes in other markets.

Case study: Afghanistan

Case study

MTN's responsible exit from Afghanistan: an ethical approach to strategic transition



MTN Group's departure from Afghanistan is in line with the MTN Group's intention to transition out of its Middle East operations to focus on its pan-African strategy as outlined by **Ambition 2025**. The exit from Afghanistan involved the signing of a Sale and Purchase Agreement with Investcom AF Limited in March 2023, facilitating the transfer of 100% ownership of MTN Afghanistan's shares.

To ensure a responsible transition, MTN conducted a thorough human rights impact assessment (HRIA) between May and August 2023, adhering to the UN Guiding Principles on Business and Human Rights. This proactive assessment aimed to identify and address potential human rights impacts associated with Investcom AF's acquisition of MTN Afghanistan. The HRIA encompassed the two perspectives of human rights impact assessment. Firstly, the current state of digital human right risks in Afghanistan, or the right-holder perspective (external to the business), and secondly, the potential human rights impacts that may result from, or during, the acquisition process (associated with internal governance).

The assessment considered risks related to information security, data governance and the implications of new product development on users. Post-acquisition, MTN emphasised the importance of ensuring the continuity and alignment of human rights processes between Investcom AF and MTN. This involved addressing potential impacts on the standard of living of employees, technology handover and the handover of customer data with a specific emphasis on maintaining data protection standards.

In addition, MTN provided strategic recommendations to Investcom AF, advocating for a human rights-focused approach guided by international principles. The recommendations included establishing robust governance structures, transparently addressing identified human rights risks, conducting regular HRIAs and investing in partnerships with human rights organisations for capacity building.

MTN's responsible exit from Afghanistan underscores our commitment to human rights and MTN proactively addresses potential risks and impacts associated with the transition. The Group's comprehensive approach further exemplifies our dedication to fostering positive human rights impacts in the telecommunications sector.

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To ensure a responsible transition, MTN conducted a thorough HRIA between May and August 2023, adhering to the UN Guiding Principles on Business and Human Rights. This proactive assessment aimed to identify and address potential human rights impacts associated with Investcom AF's acquisition of MTN Afghanistan.

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Child online protection

MTN's commitment to child online protection

As technology continues to advance, children are becoming more connected and engaged online at younger ages, making them increasingly vulnerable to exploitation and harm. We are committed to educating children, parents, teachers and caregivers on responsible digital technology use to ensure children's online safety. Our comprehensive Group-wide Child Online Protection programme works harmoniously with initiatives at Opcos level, enabling us to create a safer online environment for children.

Demonstrating impact through Internet Watch Foundation (IWF) membership and blocking activities

MTN recognises the significance of adopting a comprehensive approach to child online protection. We understand this necessitates collaboration among telecommunications providers, regulatory bodies, law enforcement and civil society organisations. This commitment is evident through our membership in the IWF since 2019, where we hold a top-level position. This strategic partnership grants MTN access to the services offered by the IWF, particularly the child sexual abuse material (CSAM) URL blocking list, which is extended across all our Opcos. Our collaborative initiatives with organisations like the IWF underscore our proactive stance in staying ahead of emerging challenges and implementing robust measures to protect children's digital rights.

About the IWF

The IWF is a non-profit organisation dedicated to protecting children online. With a history spanning more than 26 years, the organisation provides a secure way for people to report child sexual abuse imagery anonymously, available in over 50 countries. The community includes more than 190 global technology companies committed to this cause. Highly trained analysts within the organisation assess public reports and take proactive steps to make the internet safer for everyone.

MTN's Adaptive Mobile blocking activities

MTN uses an adaptive system designed to identify and block URLs deemed inappropriate or potentially harmful to its users. This system is flexible and considers each market's unique characteristics, providing a dependable and efficient method for filtering out harmful content. The filtering process is anchored in a daily list of URLs supplied by the IWF feed, which catalogues information about websites known to host CSAM or other illicit content. Through our partnership with Adaptive Mobile, this list is received and used to block access to flagged URLs. This proactive measure protects MTN's users from potential exposure to harmful content.

The following graphs present data highlighting our efforts in collaboration with the IWF and Adaptive Mobile to remove content deemed harmful to children. The data indicates increases in the number of blocked URLs since 2021. While this trend raises concerns, it also suggests an improvement in our effectiveness in protecting children online.

MTN's Adaptive Mobile blocking activities	2023	2022	2021
Number of URLs inspected (m)	656	145	174
Number of URLs blocked (m)	1.0	0.7	0.3
Blocking rate (%)	0.17	0.46	0.15
Number of URLs blocked per day (m)	3 000	1 800	700

This is not a reflection of traffic profile. Some countries with lower blocking numbers have a higher blocking percentage.

MTN acknowledges child online protection measures are not uniform across markets. Data analysis reveals discernible patterns in countries where the issue is more prevalent, notably South Africa, Nigeria, Ghana, Uganda and Rwanda. The table below presents the Opcos with the highest rates of blocked traffic, which comprises 86% of the total traffic blocked.

Top five Opcos - 86% of blocked traffic can be broken down as follows:

Countries	2023	2022
South Africa	65%	64%
Nigeria	16%	15%
Guinea-Conakry	5%	4%
Cameroon	1%	2%
Uganda	1%	2%



Child online protection continued

Blocking software

MTN employs blocking software provided by Adaptive Mobile. This software scans outgoing traffic, identifying and blocking sites flagged by the IWF for containing CSAM. The effectiveness of this approach is evident in the escalating number of blocked sites reported in 2023.

Peer-to-peer influence

MTN acknowledges the influence of peers and is actively working to establish child champions within the Group and broader society.

Technology solutions

MTN is exploring the development of a tool to assist parents in better controlling their children's online activities. This tool addresses the absence of readily available apps for parental control in the African context.

Research and education

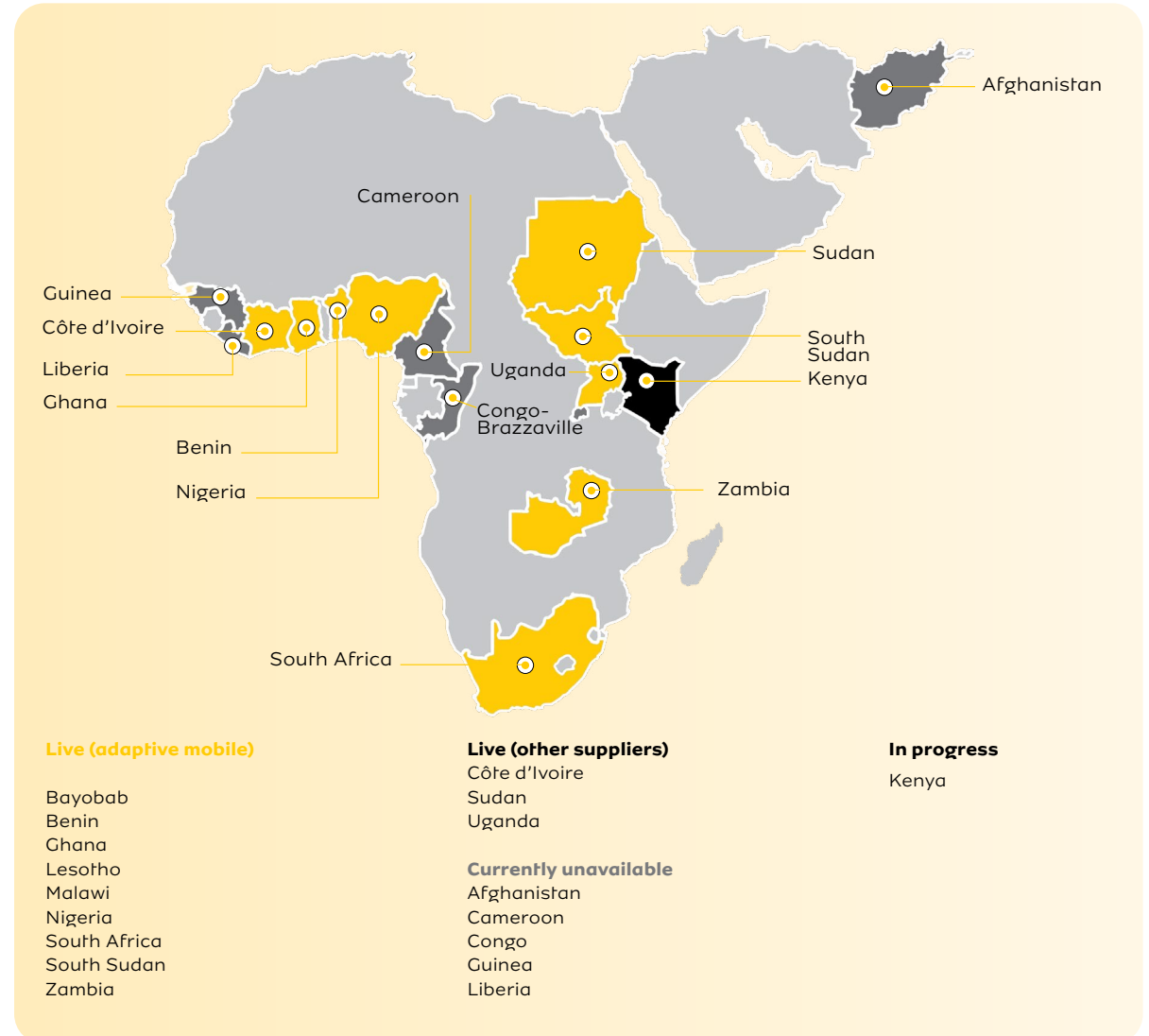
Our research and education programmes are designed to enhance awareness and empower children, parents, caregivers and educators. The Help Children Be Children campaign is one such example and focuses on raising awareness of CSAM and educating the public on how to report it in target countries. Additionally, the campaign contributes to law enforcement and child helplines training in the continent.

The increasing role of AI in child online sexual abuse

The use of AI in child online sexual abuse is witnessing a concerning rise, with a predominant presence of actual photographs of children. Some offenders perceive AI-generated images as the future of CSAM content. To counter this trend, when encountering AI-generated images, we employ hashing techniques to categorise and store them separately. The increasing realism of AI-generated content poses a challenge, as it becomes increasingly difficult to distinguish these images from actual photographs of children. Various AI image generators with diverse methods, including text descriptions and sample images, contribute to the proliferation of such content, necessitating vigilant efforts to address this emerging issue in the fight against online child exploitation.

MTN's blocking software rollout status

MTN has been actively implementing an adaptive mobile rollout strategy, which involves strategically deploying mobile networks tailored to each market's specific needs and characteristics. This approach considers factors such as population density, terrain and existing infrastructure, aiming to offer reliable and affordable mobile services to a broad audience.



Case study: South Sudan

MTN South Sudan's online child safety survey



In 2023, MTN conducted a survey on child online safety in Juba, South Sudan, aiming to understand the internet usage patterns of children and adolescents in the region. The primary goal was to enhance online child safety throughout the country, with secondary objectives focusing on identifying risks of exploitation and abuse, categorising at-risk children, and evaluating the impact of technology on child safety. While Juba served as the research site, the findings were intended to form the basis for nationwide improvements, influencing policies and practices.

The study yielded key recommendations for enhancing child online safety in South Sudan. While acknowledging the vital role of parental supervision, the findings cautioned against excessive reliance on parental controls. Instead, the emphasis was placed on increasing awareness among children and parents as an effective means to mitigate risky online behaviour. The significance of education, vigilance, reporting mechanisms and psychosocial assistance for children was underscored. Advocacy for device oversight, time limitations on internet usage and marketing safety measures on popular platforms aimed to foster a culture of transparency and communication between parents and their children.

Recognising the cultural context is crucial, particularly in Africa where respect for elders and communal decision making are prominent. The case study highlights the need for culturally sensitive approaches, suggesting that measures like parental controls be implemented with care. Aligning with communal values, framing device oversight and time limitations as fostering discipline could resonate more effectively. Involving extended family and community leaders in awareness campaigns respects the cultural fabric and contributes to a more inclusive strategy. By integrating these cultural nuances, MTN aims to ensure a comprehensive and culturally sensitive approach to creating a safer online environment for children and adolescents in our markets.

Below are some of the experiences the children shared.

"I felt bad because they were making bad comments about my pictures on Facebook because of how I looked."
Female respondent, victim of online harassment (Juba, South Sudan)

"Received a message saying, 'If not, you will die'."
Male respondent, victim of online harassment (Juba, South Sudan)

The children also highlighted being sextorted and receiving sexual content from people online.

"Scammers ask for nude pictures."
Female respondent, victim of online harassment (Juba, South Sudan)

"Threatening to expose a photo that I had sent to my ex-boyfriend."
Female respondent, victim of online harassment (Juba, South Sudan)

"Someone sent me a naked photo of herself"
Male respondent, victim of online harassment (Juba, South Sudan)

Collaborating with partners

MTN actively engages with industry networks and bodies to remain at the forefront of developments, align with best practices, share expertise and contribute to industry policies. This serves as a valuable training mechanism and facilitates collaboration with peers and experts.

Collaborating with the GSMA, MTN contributes to initiatives such as the ESG metrics pilot and digital integrity pilot. MTN leverages the Joint Audit Co-operation (JAC) for various purposes, including sharing best practices, case studies and lessons learnt, mapping supply chains and the Human Rights Index, collaborating with civil societies and expanding the human rights workstream to cover risks in the supply chain.

MTN also participates in the GNI. The GNI, which has established global principles on freedom of expression and privacy (GNI Principles), assists MTN in upholding these rights when faced with government pressure to disclose user data, remove content, or restrict communications. GNI also offers opportunities for MTN to engage with multiple stakeholders and participate in international exchanges, enriching MTN's digital human rights approach through peer learning and influencing emerging policies.

The Group's strategic memberships and active participation in industry initiatives underline MTN's commitment to ethical practices, human rights and global standards in telecommunications.



Stakeholder engagement

MTN engages with stakeholders on digital human rights on an ongoing basis. Our commitment to open dialogue and knowledge-sharing is exemplified through our key relationships and participation in various forums. These engagements go beyond enriching our understanding; they serve as opportunities for peer learning and information exchange.

In addition to global engagements, MTN collaborates with civil society organisations working on child protection. These engagements underscore MTN's commitment to transparency, collaboration and continuous improvement.

	Meeting group	Key outcomes	Frequency
Memberships	<ul style="list-style-type: none"> • GNI • IWF • Business for Social Responsibility • UN Global Compact • GSMA Mobile Alliance Against Child Sexual Abuse 	These memberships enable us to remain abreast with trends in the digital human rights space and contribute to policy development.	Monthly Monthly Quarterly Monthly Monthly
Working groups	<ul style="list-style-type: none"> • JAC Human Rights Stream • GNI Policy Committee • GNI Armed Conflict Working Group • GSMA Sustainability Network Meeting • GSMA ESG Metrics for Mobile 	Participation in working groups enables us to engage with industry peers and contribute to policy development.	Monthly Monthly Monthly Monthly Monthly

MTN is a member of the following bodies

- Signatory of the UNGC.
- The GNI.
- GSMA.
- Sustainability Network.
- Data Protection and Privacy Working Group.
- Centre for Internet Security.
- Information Security Forum.

MTN is guided by the following international standards and guidelines

- The United Nations Universal Declaration on Human Rights.
- The United Nations 'Protect, Respect and Remedy' Framework and Guiding Principles.
- African Union Convention on Cybersecurity and Personal Data Protection.
- ECOWAS Supplementary Act on Personal Data Protection (2010).
- SADC Model Law on Data Protection.

COMBATING CHILD SEXUAL EXPLOITATION

In 2023, after 15 years of concerted efforts to combat child sexual abuse on mobile networks, the GSMA and its Mobile Alliance against child sexual abuse content sought guidance from experts and partners to address the contemporary challenges in the digital landscape. The enquiry aimed to discern the most effective ways for the mobile community to contribute to the fight against sexual exploitation of children online.

Key themes emerged, underscoring the mobile community's potential role in countering child sexual exploitation in the digital era. Mobile operators, leveraging their customer relationships, global corporate presence and commercial influence, are positioned to actively promote online safety, set standards for the internet industry and collaborate with remote services such as child helplines.

The GSMA expressed gratitude for external partner support and anticipates a sustained co-ordinated response against digitally facilitated child sexual exploitation.

MANAGING THE IMPACT OF NETWORK SHUTDOWNS

In a roundtable organised by the GSMA, discussions revolved around the complexities of managing the impact of network shutdowns in today's internet-dependent era. Insight was shared from various perspectives, including government, industry and civil society, focusing on the consequences of service restriction orders and potential solutions.

The key takeaways underscored the importance of open dialogue between mobile network operators, regulators and government bodies to enhance mutual understanding of the role of connectivity. Reflecting on challenges during elections, the discussion emphasised a balanced approach considering both consumer rights and government expectations.

The consensus leaned towards targeted actions against malicious actors, preserving internet access for society. The roundtable also emphasised the ongoing necessity for collaborative dialogue to ensure an open, accessible and rights-respecting digital future, calling for understanding and action to safeguard connectivity for all.

Case study: GSMA

GSMA Mobile Alliance to combat digital child sexual exploitation



MTN is an active member of the GSMA Mobile Alliance to combat digital child sexual exploitation

This is an international group of mobile operators within the GSMA that has committed to working together and taking proactive steps to fight technology-facilitated child sexual exploitation.

Our mission within this alliance is to be a trusted partner, contributing to the global community's endeavours to eliminate child sexual exploitation and abuse in the digital environment. This commitment involves providing leadership, co-ordinating responses and setting standards within the mobile community. Specific actions include deploying and promoting good practices to enable a co-ordinated response to digitally facilitated child sexual exploitation, offering educational programmes on online safety, supporting national child helplines, co-operating with law enforcement units and advocating for multistakeholder action, notably through promoting the WeProtect Model National Response.

Additionally, MTN ensures the alliance remains informed, consults with experts and evolves its response collaboratively to address emerging issues. Our active participation enhances the alliance's effectiveness in combating digital child sexual exploitation and abuse, contributing to a safer digital environment for children globally.

Q&A: GSMA



Q&A with Natasha Jackson, GSMA Head of Public Policy and Consumer Affairs

In 2023, the GSMA embarked on a consultation journey, engaging experts and partners to address a pressing question: How can the mobile community best contribute to combating child sexual exploitation in today's digital landscape? As the world observes Safer Internet Day 2024, the GSMA proudly announced its relaunch as the GSMA Mobile Alliance to combat digital child sexual exploitation. This transformation reflects the alliance's commitment to adapt and respond to the evolving challenges posed by the digital environment. Through collaborative efforts and stakeholder consultations, the alliance will pioneer initiatives that safeguard children from the perils of online exploitation.

Q

What prompted the transformation of the GSMA Mobile Alliance to combat digital child sexual exploitation?

A

The decision to refocus the GSMA Mobile Alliance was driven by a collaborative consultation among experts and partners in the field of child protection within the digital ecosystem. Recognising the evolving challenges posed by digital exploitation of children, the alliance sought to broaden its scope and mission to effectively address these issues in today's digital landscape.

Q

Could you elaborate on the evolution of the Mobile Alliance and its mission?

A

Originally established in 2008 as the Mobile Alliance Against Child Sexual Abuse Content, the alliance has continuously evolved to adapt to changes in the digital environment. Initially focused on preventing access to explicit content, the alliance now addresses a wider range of digital threats to children, reflecting the complex nature of technology-facilitated exploitation.

Q

How has the digital environment changed since the inception of the Mobile Alliance?

A

Significant changes have occurred in the digital realm, particularly in the means of accessing digital services and the nature of online threats to children. The widespread use of mobile devices, coupled with encryption and diverse digital platforms, has made it more challenging for mobile operators to disrupt access to harmful content effectively.

Q

What are the key themes that emerged from the 2023 consultation regarding the role of mobile operators in combating child sexual exploitation?

A

Several key themes emerged, including the potential of mobile operators to promote online safety messages to their customers, facilitate collaboration between stakeholders at the national level, set industry standards, support remote services such as child helplines and assist law enforcement agencies in investigating online crimes against children.

Q

How does the alliance plan to collaborate with national and international stakeholders moving forward?

A

The GSMA Mobile Alliance remains committed to collaborating with stakeholders to address digitally facilitated child sexual exploitation comprehensively. By leveraging relationships with governments, implementing industry standards and supporting law enforcement agencies and child helplines, the alliance aims to field a co-ordinated response to these critical issues.

Q

How can mobile operators interested in joining the Mobile Alliance to combat digital child sexual exploitation get involved?

A

Mobile operators interested in joining the alliance or learning more about its initiatives are encouraged to reach out for further information and engagement opportunities.

As the GSMA Mobile Alliance transitions to combat digital child sexual exploitation, we remain steadfast in our dedication to protecting children in the digital sphere. Guided by insight gleaned from stakeholders and experts, we are poised to address the complex challenges of digital exploitation with resolve and innovation. It is our collective responsibility to ensure the safety and wellbeing of children online, and through collaborative action, we can make a tangible difference in their lives.

Case study: Zambia

Help Children be Children Campaign 3.0



In November, MTN Zambia, in partnership with Zambia Information and Communication Technology Authority (ZICTA) and Lifeline Childline Zambia, held a roundtable discussion as part of the Help Children be Children Campaign 3.0 with the main objective of raising awareness on the importance of protecting children using online platforms, as well as where to report child sexual materials by promoting the Safety Online Africa Portal and ZICTA online reporting portal to prevent the spread of CSAM online.

From 2021, MTN Zambia has implemented the Help Children be Children Campaign as a way to raise awareness on the prevalence of child sexual abuse and the importance of reporting all child sexual material on the internet.

The 2023 campaign was the third programme to target both internal staff and the external public. The Internal Awareness programme was held during the monthly town hall sessions where a quiz was conducted and staff were given gifts, as a way of ensuring the staff are the main ambassadors of raising awareness.

The external campaign was launched at a round table discussion and had representatives from ZICTA and Lifeline Childline, who provided statistics on the number of reports being received by ZICTA and the prevalence of child sexual abuse cases in Zambia. The campaign encouraged the public to report any child sexual material and to be aware of the toll-free number managed by Lifeline Childline Zambia for the purpose of providing counselling services to assist victims and parents. During the round table discussion, Save the Children representatives highlighted the study they had undertaken on the state of children.

For the second year, MTN Zambia partnered with the Football Association of Zambia and this time, raised awareness during the Afcon qualifier game at the Levey Mwanawasa stadium, which was filled to capacity with 45 600 people. The event was aired on DStv and watched in 47 countries.

MTN also used a local radio station, Radio Phoenix, to raise awareness among parents and guardians on the importance of protecting children's online access, especially during the school holidays and festive season. The radio campaigns were conducted jointly with ZICTA representatives who highlighted the legal provisions and promoted the online reporting portal.

The campaign reached over five million people in Zambia through the various electronic platforms and raised awareness within Africa. The campaign also worked with various stakeholders including law enforcement agencies.

Transparency and ranking digital rights

Transparency reporting is a cornerstone of MTN's commitment to accountability, ethical business practices and respect for human rights. We believe in providing our stakeholders, including customers, regulators and the public, with clear and comprehensive insight into our operations, policies and the impact of our activities on human rights. Our transparency reporting is a testament to our dedication to open communication and responsible corporate citizenship.

We enhance the transparency of our operations by sharing relevant information on various aspects, including data privacy, security measures and responses to government requests. Through our transparency reports, we aim to empower our stakeholders with the knowledge to make informed decisions about their engagement with our services.

As part of our commitment to staying at the forefront of industry best practices, we closely monitor trends in transparency reporting. We recognise the dynamic nature of the digital landscape, regulatory environment, and societal expectations. Consequently, our transparency reports evolve to address emerging issues, changing regulatory requirements and global trends in corporate accountability. In adapting our reporting practices, we ensure our stakeholders receive up-to-date and relevant information about our efforts to respect and protect human rights in the digital era.

Recent trends in transparency reporting have highlighted the increasing importance of companies addressing issues such as data governance, digital rights and the impact of business activities on society. As we navigate the landscape of emerging technologies, MTN acknowledges the potential of 5G and AI as enablers of human rights. However, we also recognise the need to address potential asymmetries in adoption, which can worsen the digital divide and further inequality.

Progress in ranking digital rights

MTN participates in and supports initiatives that assess and rank digital rights practices. We recognise the significance of external evaluations to benchmark our performance, identify areas for improvement and showcase our dedication to human rights standards. Progress in ranking digital rights reflects our commitment to transparency and demonstrates our responsiveness to the evolving expectations of stakeholders. The Group gains valuable insight into global best practices and industry benchmarks by engaging with external assessments and rankings, such as those provided by organisations like Ranking Digital Rights (RDR). We use these assessments to refine our policies, strengthen our human rights commitments and foster continuous improvement in our operations.

In 2022, MTN was part of RDR inaugural Telco Giants Scorecard ranking 12 of the world's leading telecommunications companies on their commitments to protect users' freedom of expression and privacy rights. MTN ranked sixth, outperforming all telecommunications companies outside the USA and Europe in each of three categories, namely: governance, freedom of expression and privacy. For the first time, MTN surpassed Orange, a European telecommunications that operates extensively in Africa. MTN's commitment to protecting users' privacy rights and freedom of expression exemplified the trend.

In 2023, MTN continued the progress made in previous years, by publishing policies and procedures that further emphasised MTN's commitment to user protection.

This included publishing the following two commitments:

- **MTN Position Statement on Responsible Marketing**, which provides transparency on marketing content not permitted or aligned with MTN's values
- **MTN Privacy Notice**, which describes MTN's process of notifying users of policy changes, using appropriate channels specific to the individual.

RDR has been unable to conduct scoring for 2023, citing internal capacity constraints. Nevertheless, MTN has made substantial internal improvements and the positive impact of these changes is anticipated to be comprehensively reflected in the upcoming 2024 assessment.

MTN is among the top-performing companies headquartered in Africa. The company is one of the few organisations with a Group-wide position on children's online rights. The company also stands out for its transparent reporting on economic value distribution, tax payments across markets and initiatives for developing digital skills and enhancing school connectivity.

Source: World Benchmarking Alliance (2023)



Markets report

MTN operates within diverse markets, each characterised by unique socioeconomic and political contexts, presenting a mix of challenges and opportunities. The Group recognises that the nuanced differences in each country are essential for tailored and effective service provision. This section of the report provides a brief overview of the human rights landscape in all our operational markets, underscoring the understanding that operating uniformly may not be feasible. MTN firmly upholds the rule of law in every country of operation, reflecting our commitment to and respect for legal principles.

Our portfolio
at 31 December 2023

(MTN Group effective
shareholding)

	MTN South Africa	100.0%
	MTN Nigeria ▲	76.3%
SEA		
	MTN Uganda ▲	83.1%
	MTN Rwanda ▲	80.0%
	MTN Zambia ▲	89.8%
	MTN South Sudan	100.0%
	Mascom Botswana ^Δ	53.1%
	MTN eSwatini ^Δ	30.0%
WECA		
	MTN Ghana ▲ [#]	81.0%
	MTN Cameroon	80.0%
	MTN Côte d'Ivoire	66.8%
	MTN Benin	75.0%
	MTN Guinea-Conakry	75.0%
	MTN Congo-Brazzaville	100.0%
	LonestarCell (MTN Liberia)	60.0%
	MTN Guinea-Bissau	100.0%
MENA		
	MTN Sudan	85.0%
	MTN Afghanistan ■	100.0%
	MTN IranCell ^{Δ+}	49.0%
Associates, joint ventures (JVs) and other investments		
	aYo	50.0%
	IHS Group	25.7%
	Iran Internet Group ^Δ	29.5%
	Middle East Internet Holding ^Δ	50.0%

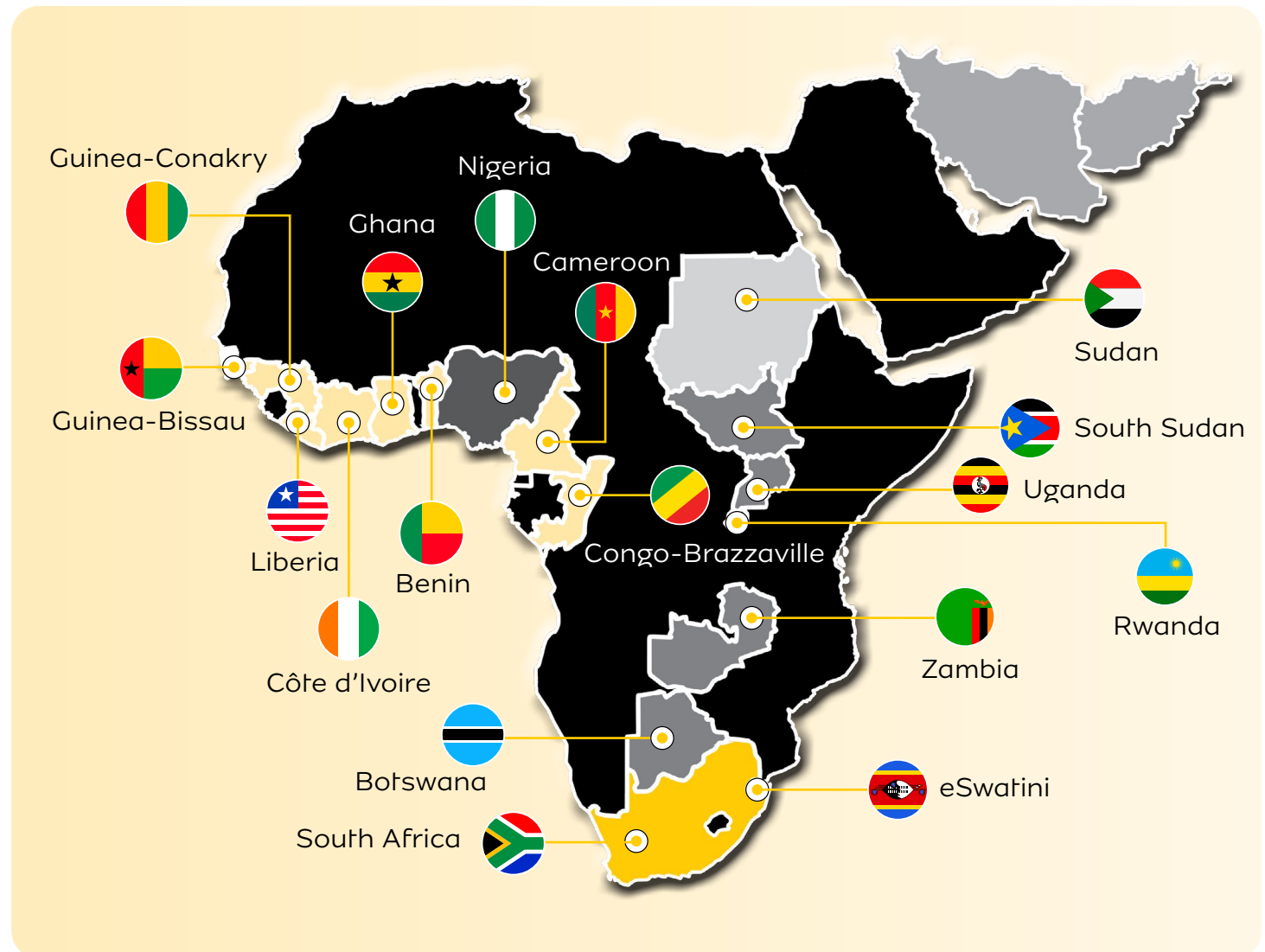
▲ Localisations.

■ Exiting in an orderly manner over the medium term.

Δ Equity accounted.

[#] Legal ownership is 77.3%.

⁺ The Group has no management control.



Markets report continued

Categories of requests from authorities

Opcos have supplied data pertaining to requests received from both authorities and non-governmental entities. Given the diverse array of laws and regulations applicable to our markets, we have classified the requests from authorities into the relevant categories.

Data request type (authorities)		Data request description
	Requests pursuant to criminal investigations	Requests by authorities submitted pursuant to the terms of applicable laws or by virtue of a court order for information of subscribers in the context of criminal investigations, such as subscriber identification, call and SMS information, billing statement and historical location data. These requests do not include requests by authorities for the content of the underlying communications or requests related to MTN.
	Requests for location disclosures	Requests by authorities that are regulatorily permitted by applicable laws or by virtue of a court order for the current location of a subscriber.
	Requests for lawful interceptions	Requests by authorities that are regulatorily permitted by applicable laws or by virtue of a court order for the lawful interception of a subscriber's communication.
	Requests pursuant to governmental or regulatory oversight	Requests by authorities for information required by the authorities to perform their designated governmental or regulatory functions, including their oversight of telecommunication service providers.
	Requests pursuant to suspension of MSISDNs, and subscriber identification module (SIM) cards	Requests by authorities that are legally permitted by applicable laws or by virtue of a court order obliging mobile network operators to suspend/ deactivate SIM cards or mobile subscriber integrated services digital network (MSISDN) numbers of subscribers.
	Service restriction orders and internet shutdown	Requests by authorities that are legally permitted by applicable laws or by virtue of a court order obliging mobile network operators to block or restrict a service or shutdown the internet/social media services.
Data request type (non-governmental entities)		Data request description
	Requests pursuant to civil litigation	These requests generally consist of requests made by non-governmental entities engaged in civil litigation with or on behalf of subscribers and subscriber requests for their own data.
	Requests for personal and private use	Subscribers may request access to their own data for several reasons, including to comply with a requirement from an embassy or a visa requirement.

There may be, to some extent, an overlap between the above mentioned categories of requests as certain requests received by an Opco may be broader than others.

Requests from competent authorities, NGOs and applicable regulatory frameworks

Overview of total requests received

The digital human rights landscape in our markets underwent significant shifts in 2023, as evident in the quantitative data. These changes reflect a dynamic intersection of technology, regulatory adjustments and evolving priorities in the realm of digital human rights.

- **Criminal investigation requests:** The decrease in criminal investigation requests from 81 262 in 2022 to 74 134 in 2023 may signify a proactive shift in law enforcement strategies. Enhanced surveillance techniques, pre-emptive interventions and advancements in technology may have enabled authorities to identify and address criminal behaviour more efficiently. Furthermore, public awareness campaigns and educational initiatives focusing on cybercrime prevention may have contributed to a decline in criminal activities, reflecting a positive trend towards improved crime prevention strategies and community engagement in promoting digital safety and security.
- **Government and regulatory oversight requests:** Regulatory oversight requests notable reduction, declining from 1 507 in 2022 to 295 in 2023. This considerable drop may indicate a shift in regulatory priorities or a refinement of regulatory frameworks in response to changing technology dynamics or policy considerations.
- **Lawful interception requests:** Lawful interception increased from 267 in 2022 to 1 476 in 2023. This increase suggests a heightened focus on monitoring communications for security reasons or responding to emerging threats.
- **Location disclosure requests:** Location disclosure requests increased from 36 635 in 2022 to 90 816 in 2023. This underscores the ongoing complexities in regulating the disclosure of subscriber locations and an increased need for location-specific data in criminal investigations.
- **MSISDNs and subscriber identification requests:** The most striking change occurred in MSISDNs and subscriber identification requests, increasing from 88 575 in 2022 to 130 480 in 2023. This growth signals an escalating demand for subscriber information, driven by the expanding digital landscape, increased utilisation of mobile services and the imperative for comprehensive user identification.
- **Services restriction orders and internet shutdown requests:** The number of services restriction orders and internet shutdown requests significantly increased from 27 in 2022 to 196 in 2023. This uptick raises concerns about governmental actions impacting freedom of expression and access to information, signalling a potentially concerning trend in restricting online services for various reasons.

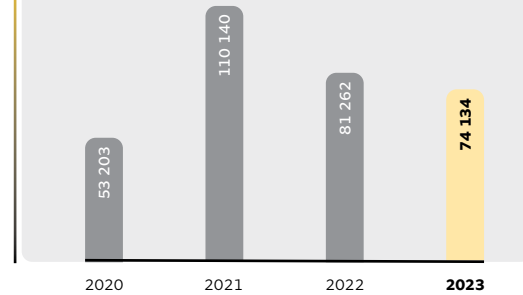
Markets report

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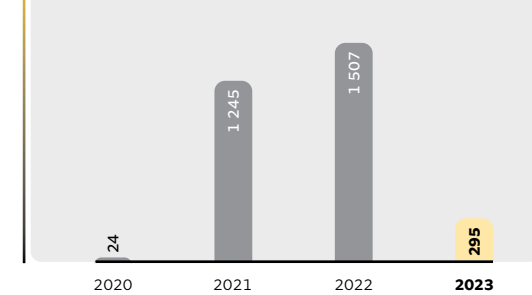
Requests from non-governmental entities

- *Personal and private use*: Requests for personal and private use increased from 763 in 2022 to 1 231 in 2023. This rise suggests a growing awareness or necessity among individuals to access their own data for various reasons, indicating an increased understanding of digital rights.
- *Civil litigations*: Civil litigation requests saw a decrease from 455 in 2022 to 341 in 2023. The decrease in civil litigation requests from 455 in 2022 to 341 in 2023 suggests an improvement in dispute resolution mechanisms and heightened legal compliance awareness. This decline signifies a positive trend towards more effective conflict resolution methods and proactive approaches to addressing legal risks.

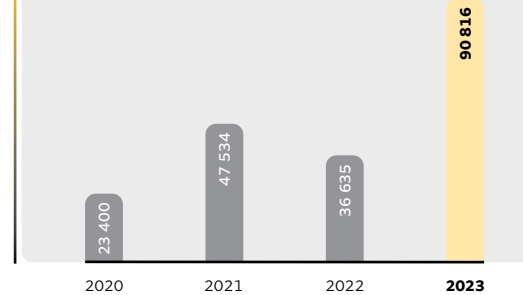
Criminal investigation



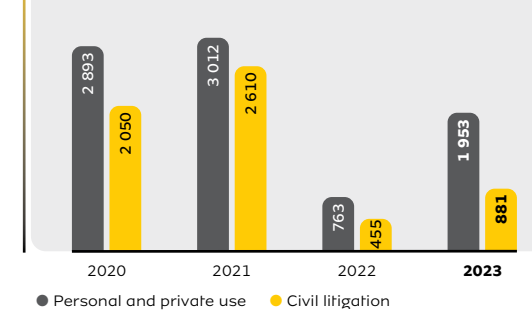
Governmental and regulatory oversight



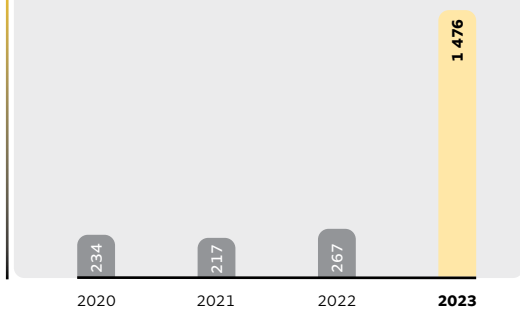
Location disclosure



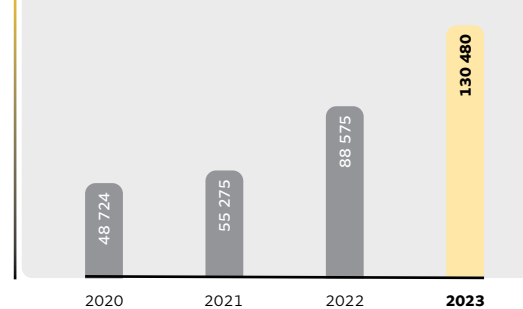
Requests from non-governmental entities



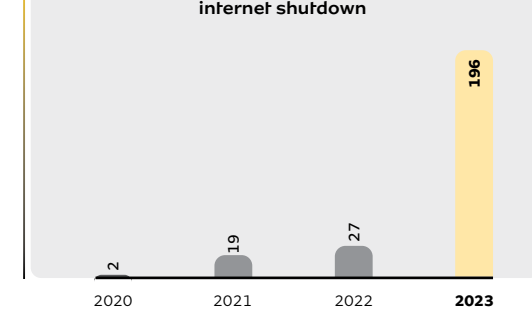
Lawful interception



MSISDNs and subscriber identification



Service restriction order and internet shutdown



Markets report continued

Mapping trends in African digital human rights

Rise in internet users

In 2023, Africa witnessed a surge in internet users, driven by improved accessibility and coverage. This trend aligns with heightened awareness of digital human rights, as supported by reports from the International Telecommunication Union and various regional bodies.

The digital divide

The widening digital divide and inadequate inclusion of marginalised groups, especially women, youth and people with disabilities, were a prominent trend in 2023. Reports from organisations such as the World Bank and the United Nations substantiated these disparities, with efforts to address them primarily driven by the private sector, as highlighted in industry reports and digital inclusion initiatives.

Disinformation landscape: disinformation, fake news and unethical media practices

The rise of disinformation emerged as a noteworthy trend impacting the digital rights landscape. The intentional dissemination of false or misleading information across digital platforms raised concerns about trust erosion, manipulation of public discourse and potential threats to individual freedoms. This trend presents challenges to digital human rights, demanding vigilant efforts to mitigate its adverse effects on online spaces, uphold the integrity of information and preserve the fundamental principles of freedom of expression and privacy.

Cybersecurity and AI

The convergence of cybersecurity and AI is a key trend with implications for digital human rights. Reports from conferences and academic publications illuminate challenges in a complex regulatory environment. Digital advocacy groups and organisations involved in cybersecurity and AI governance emphasise collaborative efforts with governments and the United Nations. This prompted MTN to strategically invest in AI-led cybersecurity measures, empowering the Group to effectively address challenges in a dynamic landscape.

Mobile phones as lifelines in conflict areas

Mobile phones played a transformative role for displaced individuals and their host communities in 2023, offering access to humanitarian services, communication, financial transactions and entertainment. As a major telecommunications provider, MTN plays an important role in enabling these vital connections in challenging environments, aligning our operations with the broader humanitarian and societal needs of these regions.

Adapting governance for Africa's digital future

The rise in internet users and increased awareness of digital human rights highlight the evolving nature of connectivity and its societal impact. Challenges like freedom of expression constraints, digital divides and the interplay of cybersecurity and AI underscore the need for robust governance. As Africa progresses digitally, adaptive governance becomes essential, addressing the diverse dynamics shaping the region's digital future.

Sources

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2. <https://press.un.org/en/2023/gaef3587.doc.htm>
3. <https://www.worldbank.org/en/publication/digital-progress-and-trends-report#:~:text=Yet%20the%20digital%20divide%20remains,haves%20and%20the%20have%2Dnots>



4. <https://www.gsma.com/mobilefordevelopment/the-digital-worlds-of-displacement-affected-communities/#:~:text=Mobile%20technology%20is%20changing%20the,create%20their%20own%20digital%20worlds.>

Benin

Benin



MTN has been present in Benin since 2006 and has approximately 7.7m subscribers. In 2023, MTN's revenue in Benin was R8.1bn.



Regulatory framework

- Law No. 2022-19 of 19 October 2022 amending and supplementing Law No. 2012-15 of 18 March 2013 on the Code of Criminal Procedure in the Republic of Benin.
- Decision No. 2022-0248 laying down the perimeters and security measures and the camouflage rules of radio sites in the Republic of Benin.
- Decision No. 2022-082 laying down conditions for the termination of SIM cards by operators of electronic communications networks and services in the Republic of Benin.
- Decision No. 2022-049 on the framework of the rates for electronic communications services provided by mobile operators in the Republic of Benin.
- Decision No. 2022-025 on guidelines on national roaming on mobile electronic communications networks in the Republic of Benin.
- Decision No. 2021-197 on rules for managing the top-level Internet domain name “.bj” in the Republic of Benin.
- Decision No. 2021-237 approving the standard specifications laying down the conditions for the establishment and operation of an Internet access supply network in the Republic of Benin.
- Decision No. 2021-075 approving the standard specifications laying down the conditions for the establishment and operation of virtual mobile networks (MVNO and MVNE) in the Republic of Benin.
- Bilateral memorandum of understanding signed on 18 October 2023 between ARCEP BENIN and ARCEP Togo to implement the ECOWAS regulation on community roaming and communications facilities.
- Bilateral memorandum of understanding concluded on 9 December 2023 between ARCEP BENIN and AMRTP Mali to implement the ECOWAS regulation on community roaming and communications facilities.
- Circular No. 009 of 24 November 2023 from the Ministry of Finance relating to the closure of sites illegally exercising an online gaming activity in the Republic of Benin.
- Decree No. 2023-358 of 12 July 2023 on the conditions governing gambling and betting activities in the Republic of Benin.
- Decision No. 2023-113/ARCEP/PT/SE/GU of May 2023 on guidelines on national roaming on mobile electronic communications networks in the Republic of Benin.
- Article 23 of the Constitution of Benin (Law 2019-40 of 7 November 2019 amending the Constitution of 11 December 1990).
- Decree No. 2023-060 of 22 February 2023 approving the Protection Policy Rules of the Critical Information Infrastructures in the Republic of Benin.
- Projects that have been decided but not implemented yet:
 - creation of a National Digital Investigation Centre (Council of Ministers on 29 November 2023).
 - National Strategy for Artificial Intelligence and Big Data: one aspect of this strategy involves the adoption of regulations addressing ethics and responsibility in the field of AI along with the creation of a controlled environment for the development of initiatives.
- Decision No. 2023-113/ARCEP/PT/SE/GU of May 2023 on guidelines on national roaming on mobile electronic communications networks in the Republic of Benin.

Benin continued

Benin continued

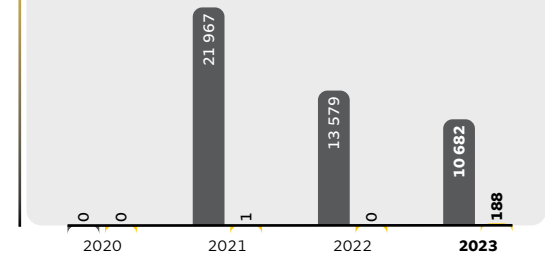


Regulatory framework continued

Authorities

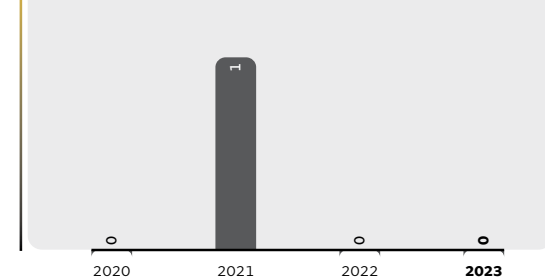
- Ministry of Justice.
- Human Rights Commission of Benin.
- Constitutional Court.
- Courts and tribunals of the country.
- Digital and Communication Ministries.
- Economic Crimes and Terrorism Court.
- Information Systems and Digital Agency (ASIN).
- Authority of Post and Electronics Communication.
- Regulatory Authority.
- Personal Data Protection Authority.
- National Financial Information Processing Units.
- General Directorate of the Republican Police.
- National Personal Identification Agency.
- Ministry of Economy and Finance.
- Ministry in Charge of the Interior and Public Security and Cultures.
- Ministry in Charge of National Defence.
- Council of Ministers.
- Minister of Finance.
- Gaming supervision unit.
- Benin National Lottery.

Requests from authorities



- Criminal investigations
- Service restriction orders and internet shutdowns

Requests from non-governmental entities



- Personal and private use

Cameroon

Cameroon



MTN has been present in Cameroon since 2000 and has approximately 11.3m subscribers. In 2023, MTN's revenue in Cameroon was R9.9bn.



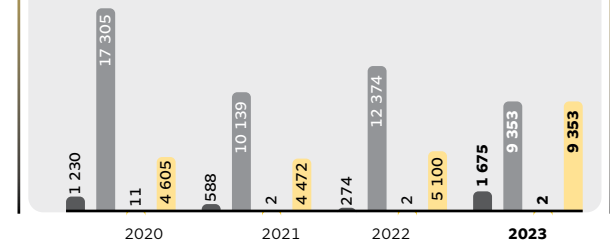
Regulatory framework

- The preamble to Cameroon's Constitution of 1972 with Amendments through 2008.
- Law No. 2010/013 of 21 December 2010 regulating electronic communications in Cameroon as modified and completed by Law No. 2015/006 of 20 April 2015.
- Law No. 2010/012 of 21 December 2010 relating to cybersecurity and cybercrime.
- Law No. 2010/021 of 21 December 2010 relating to electronic commerce in Cameroon.
- Decree No. 2013/0399/PM of 27 February 2013 laying down the modalities for the protection of consumers of electronic communications services.
- Decree No. 2015/3759 of 3 September 2015 laying down conditions for the identification of subscribers and terminal equipment of electronic communications networks.
- Decree No. 2017/2580/PM of 6 April 2017 laying down conditions for the establishment and exploitation of electronic communication networks that are subject to the regime of authorisation.
- Law No. 2015/007 of 20 April 2015 governing audiovisual activities in Cameroon.
- Law No. 2023/009 of July 25, 2023 establishing the charter for the protection of children online in Cameroon.

Authorities

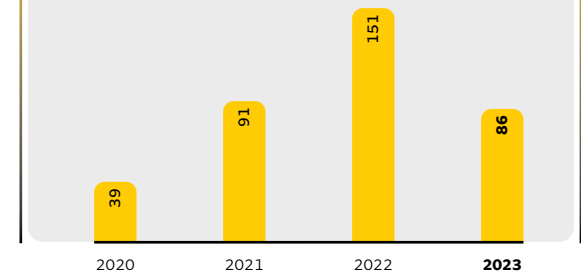
- Minister of Posts and Telecommunications.
- Telecommunications Regulatory Board.
- National Agency of ICT.

Requests from authorities



- Criminal investigations
- Location disclosure
- Government and regulatory oversight
- MSISDNs and SIM cards

Requests from non-governmental entities



- Civil litigations

Congo-Brazzaville

Congo-Brazzaville



MTN has been present in Congo-Brazzaville since 2005 and has approximately 3.5m subscribers. In 2023, MTN's revenue in Congo-Brazzaville was R4.18bn.

Regulatory framework

- Article 26 of the Constitution of the Republic of the Congo of 6 November 2015.



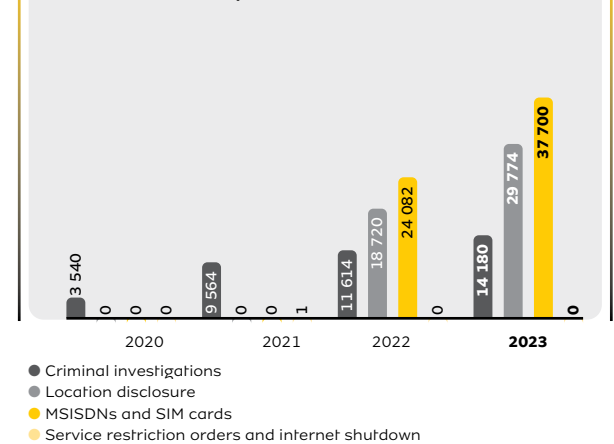
The Republic of Congo is one of six member countries of the Central African Economic and Monetary Community (CEMAC). As such, at a regional level, digital human rights are regulated by the CEMAC through:

- Directive No. 06/08-UEAC-133-CM-18 defining the regime of universal service in the electronic communications sector among CEMAC state members.
- Directive No. 07/08-UEAC-133-CM-18 defining the regulatory framework of network and electronic communication services users' rights and protection in the CEMAC.
- Directive No. 08/08-UEAC-133-CM-18 on interconnection and access to network and electronic communications services in CEMAC state members.
- Directive No. 09/08-UEAC-133-CM-18 harmonising the regulatory framework of electronic communication activities in CEMAC state members.
- Directive No. 10/08-UEAC-133-CM-18 harmonising the rules of establishing and controlling tariffs for electronic communication services in the CEMAC.
- Directive No. 21/08-UEAC-133-CM-18 harmonising the rules and regulations of electronic communication in the CEMAC.
- Decree No. 2022-1944 of 30 December 2022 approving the statutes of the national agency for information system security.

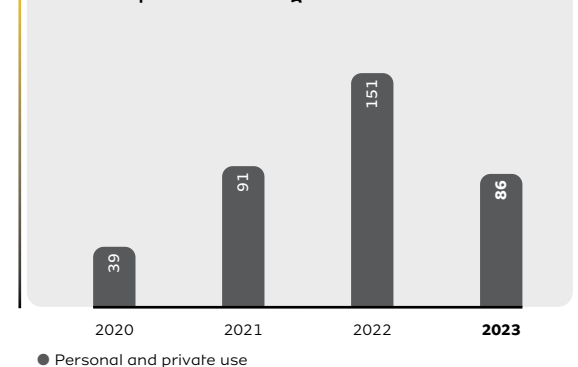
Authorities

- l'Agence de Régulation des Postes et des Communications. Electroniques du Congo-Brazzaville (ARPCE).
- National Agency of Information System Security (ANSSI).
- Directions Générale des Postes et Télécommunications, (DGPT).

Requests from authorities



Requests from non-governmental entities



Côte d'Ivoire

Côte d'Ivoire



MTN has been present in Côte d'Ivoire since 2005 and has approximately 16.9m subscribers. In 2023, MTN's revenue in Côte d'Ivoire was an estimated R10.3bn.



Regulatory framework (at national level)

- Order No. 2012-293 of 21 March 2012 relating to Telecommunications and ICT.
- Law No. 2013-450 of 19 June 2013 on the protection of personal data.
- Law No. 2013-451 of 19 June 2013 on the fight against cybercrime.
- Law No. 2013-546 of 30 July 2013 on electronic transactions.
- Law No. 2017-802 of 7 December 2017 on the orientation of the information society in Côte d'Ivoire (sets the general, legal and institutional principles of the information society in Côte d'Ivoire).
- Decree No. 2012-934 of 19 September 2012 on the organisation and operation of the Autorité de Régulation des Télécommunications/ICT de Côte d'Ivoire (ARTCI).
- Decree No. 2013-301 of 2 May 2013 on the approval of terminal and radio equipment and the approval of installers.
- Decree No. 2013-439 of 13 June 2013 setting the conditions and procedures for reserving, allocating and withdrawing numbering resources, as well as the amounts and procedures for payment of fees for the use of numbering resources.
- Decree No. 2015-812 of 18 December 2015 approving the specifications attached to each individual licence in category C 1 A, for the establishment of networks and the provision of Telecommunications/ICT services.
- Decree No. 2017-193 of 22 March 2017 on the identification of subscribers to telecommunications/ICT services open to the public and users of cybercafés.
- Decree No. 2018-875 of 22 November 2018 establishing the powers, composition, organisation and functioning of the National Commission for the Development of the Information Society (CNDSI).
- Article 19 of the Constitution of the Republic of Côte d'Ivoire dated 8 November 2016 Ordinance

- n°2023-875 of 23 November 2023 relating to the fight against money laundering, the financing of terrorism and the proliferation of weapons of mass destruction, notably its article 15.
- Decree No. 2021-245 of 26 May 2021 fixing the fees for the use of radio frequencies.
- Decree No. 2021-917 of 22 December 2021 defining the audit, control and certification procedures for information systems.
- Decree No. 2021-916 of 22 December 2021 adopting the general information systems security framework and the critical infrastructure protection plan.
- Decree No. 2021-915 of 22 December 2021 adopting the information systems security policy of the public administration.

Regulatory framework (at community level)

- Directive No. 02/2006/CM/UEMOA on the harmonisation of legal regimes applicable to telecommunication network operators and service providers. It is specified that the transposition of this directive into national law does not affect the specific regulations adopted by the member states in particular on the basis of compliance with essential requirements and other requirements in the public interest.
- Additional Act A/SA. 3/01/07 ECOWAS of 19 January 2007 on the legal regime applicable to operators and service providers: aims to harmonise the ECOWAS legal regimes applicable to the activity of telecommunications network operators and service providers and to specify the procedures for granting licences, authorisations and declarations and the conditions applicable to these different regimes. Its transposition into domestic law does not affect the specific regulations adopted at national level.

Côte d'Ivoire continued

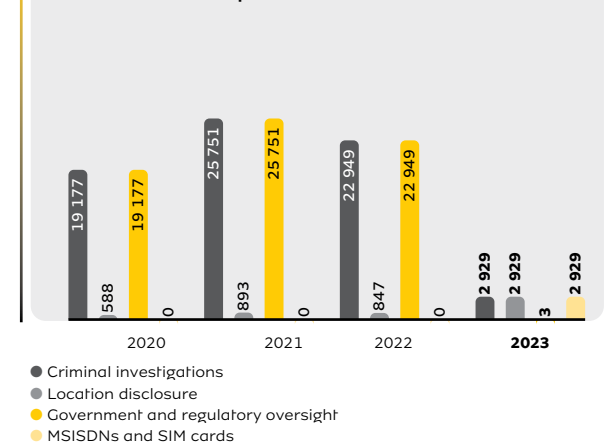
Côte d'Ivoire continued



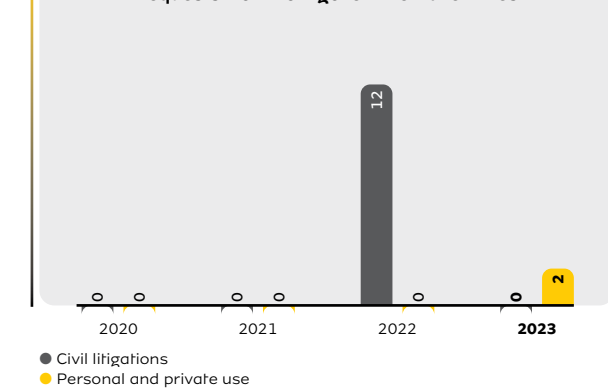
Authorities

- Autorité de Régulation des Télécommunications/ICT de Côte d'Ivoire (ARTCI).
- Agence Ivoirienne de Gestion des Fréquences radioélectriques (AIGF).
- Agence Nationale du Service Universel des Télécommunications (ANSUT).
- Platform for Combating Cybercrime.
- Ministry of Justice and Human Rights.
- Ministry of Security.
- Ministry of Defence.
- Police administrations.

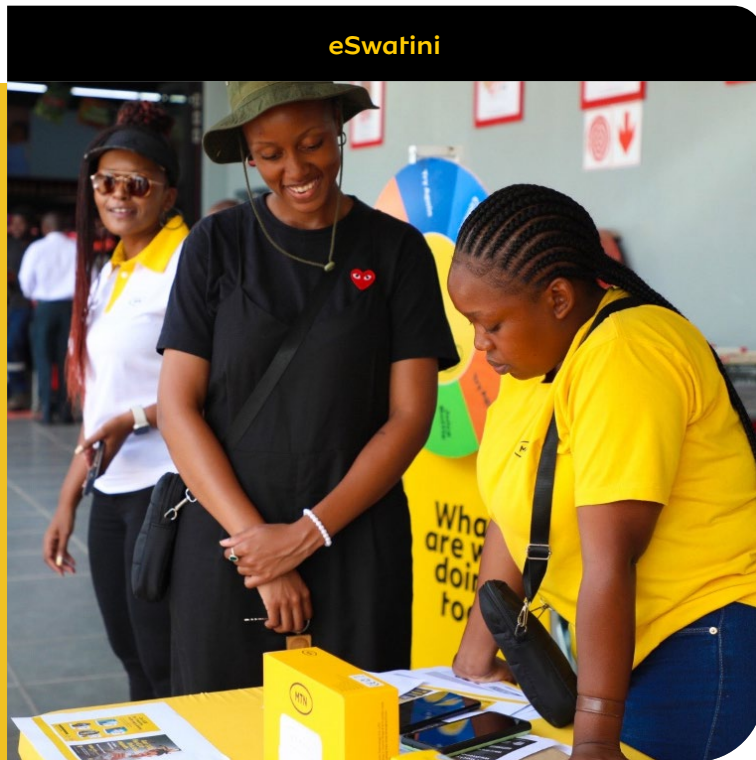
Requests from authorities



Requests from non-governmental entities



eSwatini



MTN has been present in eSwatini since 1998. The joint venture has approximately 1.05m subscribers. In 2023, MTN's revenue in eSwatini was R451m.

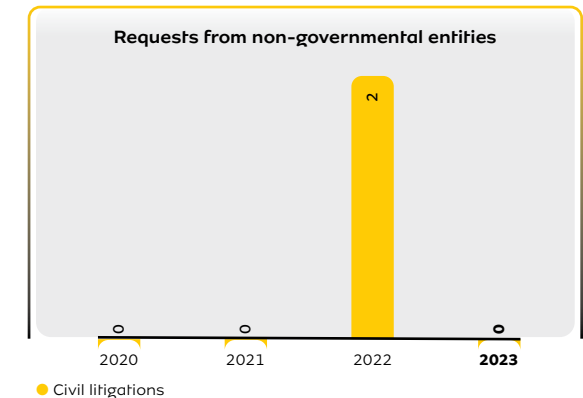
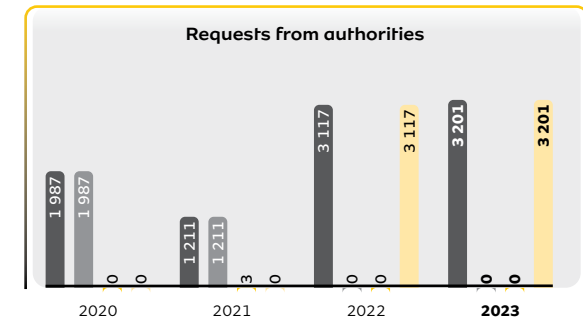


Regulatory framework

- Swaziland Communications Commission Act No. 10/2013.
- The Electronic Communications Act No. 09/2013.
- The Swaziland Communications Commission (Consumer Protection) Regulations, 2016.
- The Swaziland Communications Commission (Subscriber Registration) Regulations, 2016.
- The Televisions Guidelines, 2017.
- Section 18 of the Constitution (Protection from Inhumane Treatments which when interpreted by the Courts, includes the right to privacy) of the Kingdom of eSwatini Act No. 001/2005.
- Section 24(1) and 24(2) of the Constitution of the Kingdom of Swaziland Act 1 of 2005.
- Section 49(1) of the Criminal Procedure and Evidence Act 1938.
- Data Protection Act 2022.
- Computer Crime and Cybercrime Act 2022
- Electronic Communications Transactions Act 2022.

Authorities

- Courts.
- Statutory bodies.
- Government agencies.
- Ministry of Information Communication and Technology.
- eSwatini Communications Commission.
- Anti-Corruption Commission.
- eSwatini Revenue Authority.
- Royal eSwatini Police.



Ghana

Ghana



MTN has been present in Ghana since 2006 and has approximately 26.8m subscribers. In 2023, MTN's revenue in Ghana was R20.77bn.

Regulatory framework

- 1992 Constitution.
- Cybersecurity Act, 2020 (Act 1038).
- Electronic Communications Act, 2008 (Act 775).
- Electronic Transactions Act, 2008 (Act 772).
- Data Protection Act, 2012 (Act 843).
- Electronic Communications Regulations, 2011.
- Directive for the Protection of Critical Information Infrastructure.

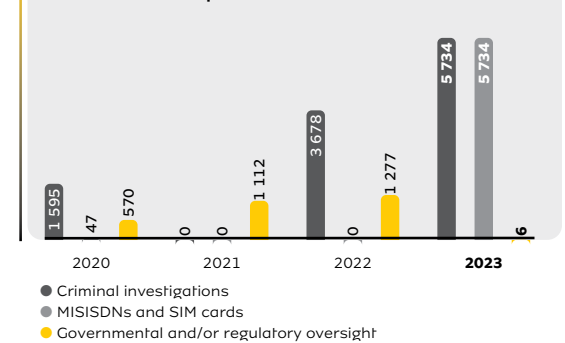


- Revenue Administration Act, 2016 (Act 915).
- Electronic Transfer Levy (E-Levy) Act, 2022 (Act 1075).
- Electronic Transfer Levy (E-Levy) (Amendment) Act, 2022 (Act 1089).
- Right to Information Act, 2019 (Act 989).
- Anti-Terrorism Act, 2008 (Act 762).
- SIM Registration Regulations, 2011 (LI 2006).
- Criminal Offences Act, 1960 (Act 29).
- Establishment of Emergency Communications System Instrument, 2020 (E.I 63).
- Communication Service Tax Act, 2008 (Act 754).
- Payment Systems and Services Act, 2019 (Act 987).
- Anti-Money Laundering Act 2020 (Act 1044).
- National Signals Bureau Act 2020 (Act 1040).

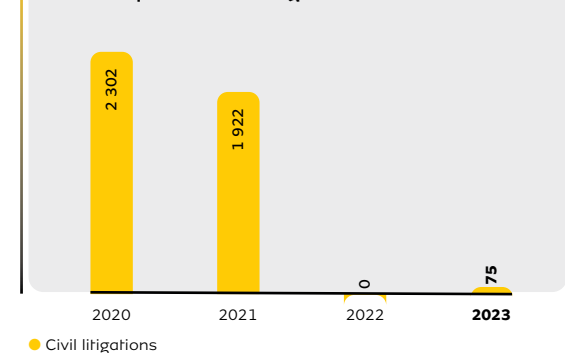
Authorities

- The Courts.
- The Cybersecurity Authority.
- The National Communications Authority.
- The National Information Technology Authority.
- The Data Protection Commission.
- The Ghana Revenue Authority.
- Bank of Ghana.
- Office of the Special Prosecutor.
- Security and intelligence agencies (Ghana Police Service, Ghana Immigration Services, Ghana Armed Forces, National Intelligence Bureau, National Signals Bureau).
- Financial Intelligence Centre.
- National Signals Bureau.

Requests from authorities



Requests from non-governmental entities



Guinea-Bissau

Guinea-Bissau



MTN has been present in Guinea-Bissau since 2005 and has approximately 838 thousand subscribers. In 2023, MTN's revenue in Guinea-Bissau was R309m.

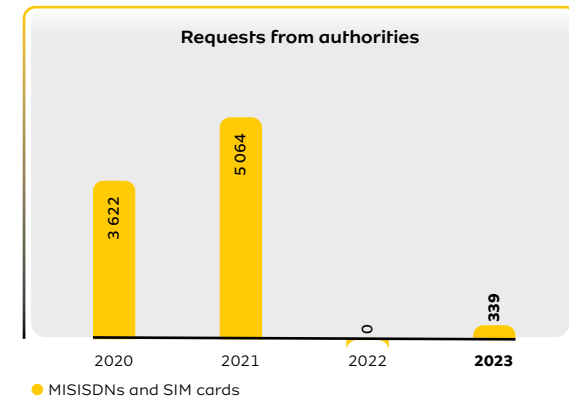


Regulatory framework

- Constitution of the Republic of Guinea-Bissau.
- Resolution 2/2018, of 25 June 2018 – Approval of government programme and initiatives.
- Law 5/2010, of 27 May 2010 – Information Technology and Communications Framework Law.

Authorities

- Autoridade Reguladora Nacional.
- Conselho Nacional Da Comunicação Social.
- Criminal courts.
- Government of the Republic of Guinea-Bissau.



Guinea-Conakry

Guinea-Conakry



MTN has been present in Guinea-Conakry since 2005 and has approximately 3.4m subscribers. In 2023, MTN's revenue in Guinea-Conakry was R1.6bn.



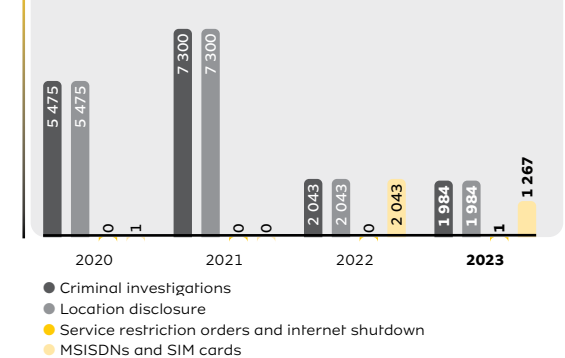
Regulatory framework

- 2020 Guinean Constitution under its Title II – Rights – Freedom and Duties.
- Law L/2016/059/AN dated 26 October 2016, carrying on Criminal Code of the Republic of Guinea under Title III – Cybercrime (Act 856 to Art. 879).
- Law 2015/018/AN related to telecommunication and technologies of information in Republic of Guinea under Article 116 dated 13 August 2015.
- African Union Convention on Cybersecurity and the Protection of Personal Data dated 14 June 2014.
- Additional Act A/SA.1/01/10 related to protection of personal data in ECOWAS area dated 16 February 2010.
- Law L/2016/037/AN related to cybersecurity and the protection of personal data in Republic of Guinea dated 28 July 2016.

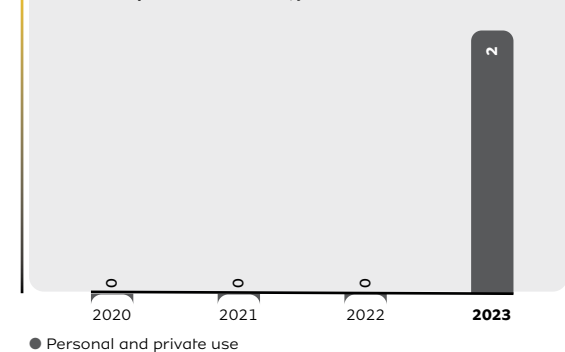
Authorities

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

Requests from authorities



Requests from non-governmental entities



Liberia



Liberia

MTN has been present in Liberia since 2005 and has approximately 2.2m subscribers. In 2023, MTN's revenue in Liberia was R1.9bn.



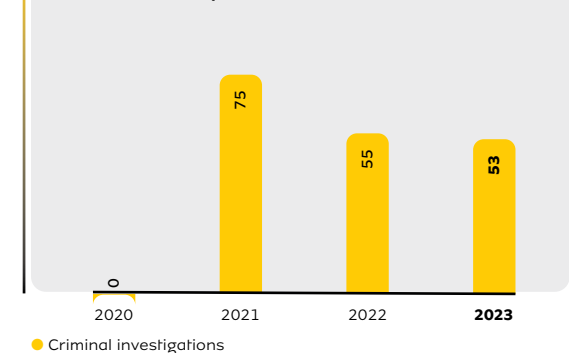
Regulatory framework

- Article 15 of the Liberian Constitution (1986).
- Telecommunications Act, 2007.
- Supplementary Act A/As. 1/01/10 on Personal Data Protection within ECOWAS.
- Amended SIM cards/removable user identity module registration regulations.
- Liberia's country code Top Level Domain (ccTLD). Regulation for its Re-delegation, Management and Operations, 2020.
- Regulations for the Treatment of Confidentiality, Dispute Resolution, Compliance and Enforcement 2009 LTA-Reg-0002.
- Regulation C/Reg. 21/12/17 on roaming on public mobile communications network in the ECOWAS region.
- Interconnection Regulations 2009 LTA-Reg-0003.
- LTA Order: 0018-01-15-20 on the implementation of free roaming on public mobile communications networks in the ECOWAS region.
- LTA Order: 0018-03-12-20 Implementing the SIM card registration regulations.
- Regulations on International Traffic LTA-Reg-0005.
- B. Draft Laws/regulations.
- Draft Summary Regulation on National Numbering Plan LTA-Reg-007.
- The National Police Act of 2016.
- The Liberia ICT Policy, 2019 – 2024.
- Freedom of Information Act, 2010.

Authorities

- Independent Information Commission.
- Liberia National Police.
- Ministry of Post and Telecommunications.
- Liberia Telecommunications Authority.
- Ministry of Justice.
- Courts of Liberia.

Requests from authorities



Nigeria



MTN has been present in Nigeria since 2001 and has approximately 79.6m subscribers. In 2023, MTN's revenue in Nigeria was an estimated R74.27bn.



Regulatory framework

- Section 37 of the Constitution of the Federal Republic of Nigeria, 1999.
- Nigeria Data Protection Regulation (NDPR), 2019.
- NDPR Implementation Framework, 2020.
- Cybercrime (Prohibition, Prevention, etc) Act 2015.
- The Consumer Code of Practice Regulations, 2007.
- Section 39 of the Constitution of the Federal Republic of Nigeria, 1999.
- Criminal Code Act.
- Defamation Law of the various states.
- Penal Code and penal laws of the various states.
- National Identity Management Commission Act.
- Nigerian Communications Regulations, 2019.
- Child's Right Act 2003.
- Child's Right Law (of Lagos State) 2007.
- Freedom of Information Act 2011.
- Terrorism (Prevention and Prohibition) Act, 2022 (S 5 - Role of law enforcement and security agencies).
- Nigeria Data Protection Act 2023 (Section 24 – 43 with specific reference to Section 34 – Rights of a Data Subject).
- National Information Technology Development Agency Act 2007.

Bills:

- Electronic Transactions Bill 2023 SB 94.
- Discrimination Against Persons with Disabilities (Prohibition) Act 2018 Amendment Bill 2023 SB 95.
- Child Online Access Protection Bill 2023 HB244.
- Cybercrimes (Prohibition Prevention etc) Act (Amendment) Bill 2023 SB64.
- Protection from Internet Falsehoods and Manipulation and Other Related Matters Bill 2019.
- National Information Technology Development Agency Act 2007 (Amendment Bill 2023).

Regulations, Policies and Guidelines

- NITDA: Code of Practice for Interactive Computer Service Platforms/ Internet Intermediaries.
- Central Bank of Nigeria: Consumer Protection Regulations 2019.
- Nigerian Communications Commission: Child Online Protection Policy.
- Nigerian Communications Commission: Lawful Interception of Communications Regulations 2019.
- Nigerian Communications Commission: Value Added Services and Aggregator Framework 2018 (amended).
- Nigerian Communications Commission (Registration of Telephone Subscribers) Regulations, 2011.

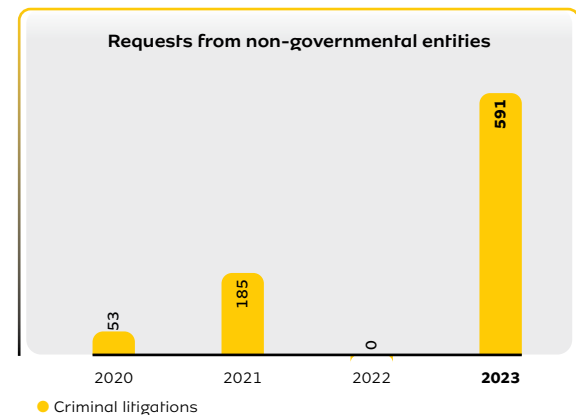
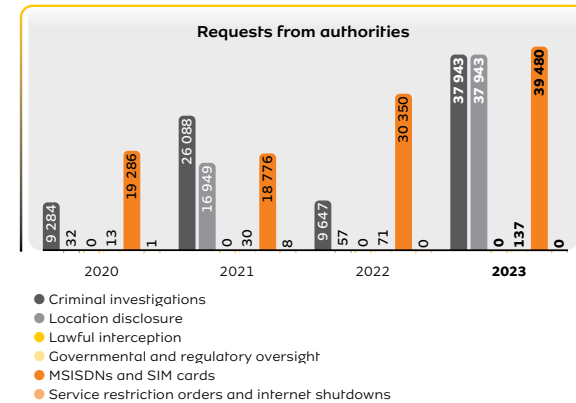
Nigeria continued

Nigeria continued



Authorities

- The National Information Technology Development Agency (the NITDA).
- The Nigerian Police Force is empowered to enforce the Criminal Code Act and Penal Code of Kaduna.
- Various law enforcement agencies for the time being in force are responsible for the implementation and enforcement of the provisions of the Cybercrime (Prohibition, Prevention, etc.) Act 2015, however, the office of the National Security Adviser is the co-ordinating body for all security and enforcement agencies under the Act.
- The Nigerian Communications Commission administers the Consumer Code of Practice Regulations, 2007, Lawful Interception of Communications Regulation, 2019 and the Registration of Telephone Subscribers Regulation, 2011 through its Nigeria Communications (e.g. enforcement process) Regulations, 2019.
- The Courts in Nigeria enforce fundamental human rights such as Section 37 of the Constitution of the Federal Republic of Nigeria, 1999.
- Relevant authorities defined under section 20 of the Nigerian Communications (e.g. enforcement process) Regulations, 2019.
- The National Identity Management Commission.
- Nigerian Courts.
- The ECOWAS Court and Institutions.
- Nigeria Data Protection Commission (Formerly the Nigeria Data Protection Bureau) administers the NDPA, NDPR and the Framework.



Rwanda

Rwanda



MTN has been present in Rwanda since 1998 and has approximately 7.26m subscribers. In 2023, MTN's revenue in Rwanda was R3.9bn.

Regulatory framework

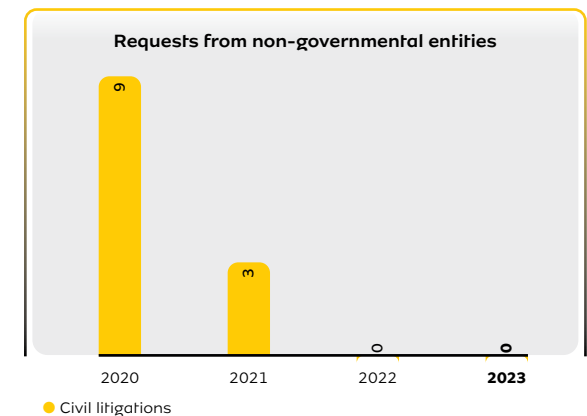
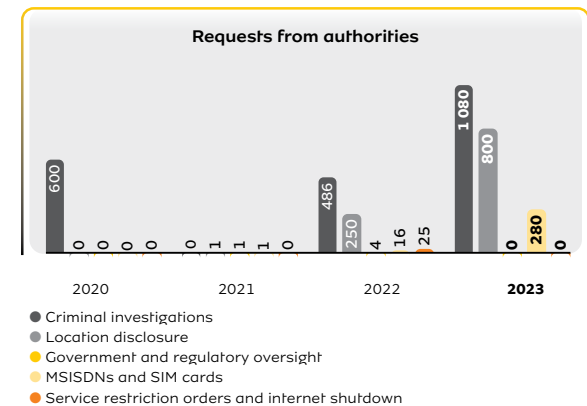
- The Constitution of Rwanda 2023.
- Law No. 04/2013 of 08/02/2013 relating to Access to information.
- Law No. 24/2016 of 18/06/2016 governing ICT.
- Law No. 02/2017 of 18/02/2017 establishing Rwanda Information Society Authority and determining its mission, organisation and functioning.
- Law No. 26/2017 of 31/05/2017 establishing the National Cybersecurity Authority (NCSA) and determining its mission, organisation and functioning.
- Law No. 09/2013 of 01/03/2013 establishing Rwanda Utilities Regulatory Authority (RURA) and determining its mission, organisation and functioning.



- Law No. 60/2018 of 22/8/2018 on Prevention and Punishment of cybercrimes.
- Law No. 60/2013 OF 22/08/2013 regulating the Interception of communications.
- Law No. 02/2013 OF 08/02/2013 regulating Media.
- Law No. 73/2018 of 31/08/2018 governing Credit Reporting System.
- Law No. 017/2021 of 03/03/2021 relating to financial service consumer protection.
- Law No. 058/2021 of 13/10/2021 relating to the protection of personal data and privacy.
- Law No. 60/2018 of 22/8/2018 on Prevention and Punishment of cybercrimes.
- Regulations Governing Cybersecurity No. 010/R/CR CSI/RURA/020 of 29/05/2020.
- Regulation No. 54/2022 of 01/09/2022 governing the electronic money issuers.
- Article 24 of the MTN Rwandacell Limited Cellular Mobile licences (issued in 2008).
- Regulation No. 79/2023 of 04/12/2023 on protection of payment services users.
- Law No. 028/2023 of 19/05/2023 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction.
- Law No. 061/2021 of 14/10/2021 governing the payment system.
- Regulation No. 50 /2022 of 02/06/2022 on cybersecurity in regulated institutions.
- Law No. 072/2021 of 05/11/2021 governing deposit-taking microfinance institutions.
- Regulation No. 49/2022 of 02/06/2022 on outsourcing.
- Regulation No. 55/2022 of 27/10/2022 relating to financial service consumer protection.
- Regulation No. 77/2023 of 04/12/2023 on provision of payment initiation, payment aggregation, merchant acquiring and payment accounts information services.
- Regulation No. 27/2019 of 09/09/2019 relating to credit reporting system.
- Regulation No. 74/2023 of 18/09/2023 of governing payment services providers.

Authorities

- The National Cybersecurity Authority.
- The Ministry of ICT and Innovation.
- Rwanda Utilities Regulatory Authority.
- Rwanda Information Society Authority.
- Rwanda Investigations Bureau.
- National Bank of Rwanda.
- Financial Intelligence Centre.



South Africa

South Africa



MTN has been present in South Africa since 1994 and has approximately 37.4m subscribers. In 2023, MTN's revenue in South Africa was R51.8bn.

Regulatory framework

- Constitution of the Republic of South Africa, 1996.
- Promotion of Access to Information Act, 2 of 2000.
- Regulation of Interception of Communications and Provision of Communication-related Information Act, No. 70 of 2002.
- Electronic Communications and Transactions Act, 25 of 2002.
- Electronic Communications Act, 36 of 2005.
- Consumer Protection Act, 68 of 2008.
- Cybercrimes Act, 19 of 2020.



- Protection of Personal Information Act 4 of 2013.
- Film and Publication Amendment Act 65 of 1996 as amended by the Films and Publications Amendment Act 11 of 2019 – Government Notice 1292 in Government Gazette 42743 dated 3 October 2019. Commencement date: 1 March 2022 [Proc. 52 in Gazette 45959 dated 25 February 2022].

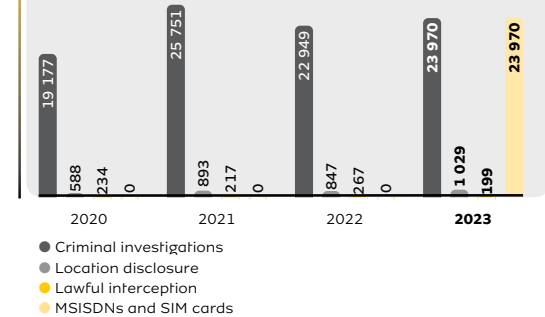
Note: The Amendment Act includes the regulation on online content by commercial online content distributors and provisions requiring internet service providers to ensure children are protected from harmful content and places a responsibility on internet service providers to report the distribution of unlawful content, i.e. CSAM. The FPA includes provisions to give effect to the provisions of the Constitution such as the limitations under the right to freedom of expression.

Authorities

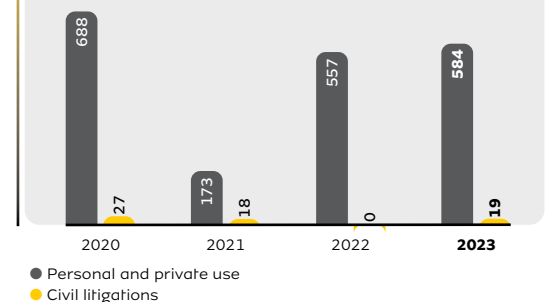
- The Department of Justice and Constitutional Development.
- The South African Human Rights Commission.
- National Prosecuting Authority of South Africa.
- South African Police Services.
- Defence Force (the South African Defence Force).
- Film and Publications Board.
- State Security Agency.
- Information Regulator (South Africa) and
- The Independent Communications Authority of South Africa (ICASA).

In addition, the above laws, acts, regulations, the terms of any licence or other legal instruments referred to above are interpreted and ruled upon by the South African judiciary, which is a separate organ of State from the executive branch (which operates the above mentioned state authorities).

Requests from authorities



Requests from non-governmental entities



South Sudan

South Sudan



MTN has been present in South Sudan since 2011 and has approximately 2.7m subscribers. In 2023, MTN's revenue in South Sudan was R2.3bn.



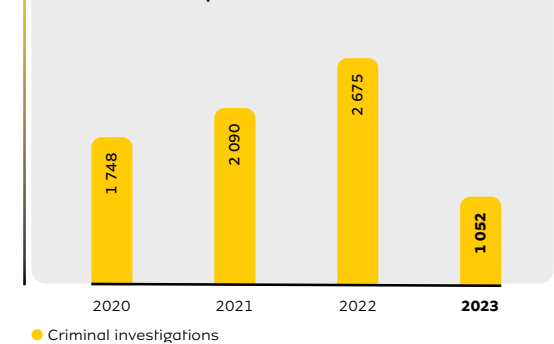
Regulatory framework

- The Transitional Constitution of the Republic of South Sudan.
- Right of Access to Information Act, 2013.
- National Communication Act, 2012.
- The Penal Code, 2008.
- National Communications Frequency Regulations, 2016.
- National Communications Tariffs Regulations, 2016.
- National Communications Dispute Resolution Regulations, 2016.
- National Communications Standards, Specifications and Type Approval Regulations, 2016.
- National Communications Inspection, Monitoring and Enforcement Regulations, 2016.
- National Communications Numbering Regulations, 2016.
- National Communications Competition Regulations, 2016.
- National Communications Licensing Regulations, 2016.
- National-Security-Services-NSS-Act-2014.
- The Electronic Money Regulations of South Sudan 2017.
- The Anti- Money Laundering and Counter Terrorist Financing Act 2012.

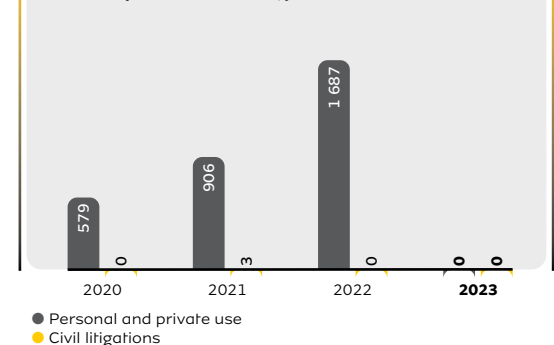
Authorities

- Ministry of Information Communication Technology and Postal Services.
- Information Commission.
- National Communication Authority.
- Supreme Court.
- Bank of South Sudan.
- Financial Intelligence Unit.

Requests from authorities



Requests from non-governmental entities



Sudan



مشروع تدريب الإعلاميين النسخة الثانية دورة صحافة الموبايل

MTN has been present in Sudan since 2005 and has approximately 5.7m subscribers.
In 2023, MTN's revenue in Sudan was R3.48bn.

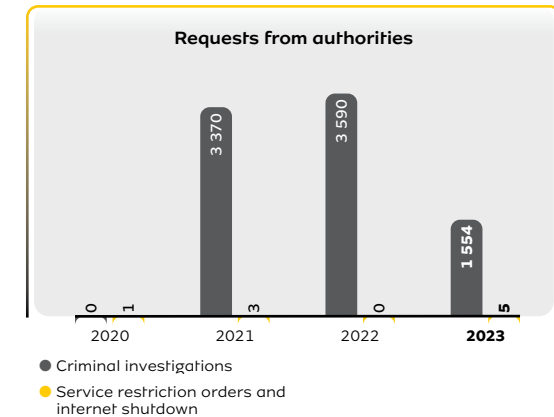


Regulatory framework

- Draft Constitutional Charter for the Transitional Period 2019 (the 'Constitutional Charter').
- Telecommunications and Post Regulation Act 2018 (the 'Telecommunication Act').
- General Telecommunications Regulation 2012 (the Telecommunication Regulation).
- Electronic Transactions Act 2007 (the E-Transactions Act).
- Combating Information Crimes Act 2018 (the 'Cybercrimes Act').
- Access to Information Act 2015 (the 'Information Act').
- Licence Agreement between Telecommunications Companies and the Telecommunications and Post Regulatory Authority (the 'Licence Agreement').
- Press and Press Printed Materials Act 2009 (the 'Press Act').
- Criminal Code 1991 (the 'Criminal Code').
- The National Security Act 2010 as amended in 2020 (the 'National Security Act').

Authorities

- Constitutional Court.
- Minister of Communications and Information Technology.
- Telecommunications and Post Regulatory Authority (the "Authority").
- The Information Crimes Court.
- The Information Prosecution.
- The Information Police.
- The Right of Access to Information Commission.
- The General Court.
- The National Press and Press Printed Materials Council.
- The National Intelligence and Security Services (the Agency).



Uganda

Uganda



MTN has been present in Uganda since 1998 and has approximately 19.5m subscribers. In 2023, MTN's revenue in Uganda was R13.18bn.

Regulatory framework

- The Regulation of Interception of Communications Regulations 2023.
- Article 27(2) and 29 of the Constitution of the Republic of Uganda, 1995.
- The Uganda Communications Act, 2013.
- The National Payment Systems Act, 2020.
- The Anti-Money Laundering Act, 2013 (as amended).
- Sections 2, 3, 4, 8, 10, 11 and 15 of the Regulation of Interception of Communications Act, 2010.
- Sections 3, 6, 7, 8, 9, 10 and 20 – 29 of the Data Protection and Privacy Act, 2019.

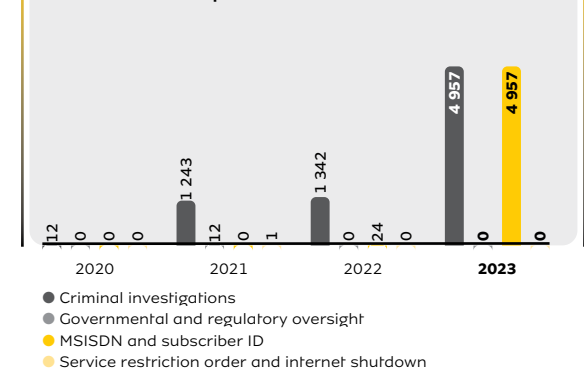


- Sections 10, 11, 23A 24, 25 26 and 26A of the Computer Misuse Act, 2011 (as amended).
- Section 32(2) of the Electronic Transactions Act, 2011.
- Section 17 of the Anti-pornography Act, 2014.
- Section 11 of the Anti-homosexuality Act, 2023.
- Sections 18 and 19 of the Anti-terrorism Act, 2002.
- Sections 88 and 91 of the Electronic Signatures Act, 2011.
- The Data Protection and Privacy Regulations, 2021.
- The Uganda Communications (Intelligent Network Monitoring System) Regulations, 2019.
- Uganda Communications (Centralised Equipment Identification Register) Regulations 2019.
- The Uganda Communications (Text and Multimedia Messaging) Regulations, 2019.
- The Uganda Communications (Consumer Protection) Regulations, 2019.
- The Uganda Communications (Content) Regulations, 2019.
- The Uganda Communications (Emergency Response) Regulations, 2019.
- Section 11 of the Anti-Homosexuality Act, 2023.
- The Uganda Communications (Computer Emergency Response Team).

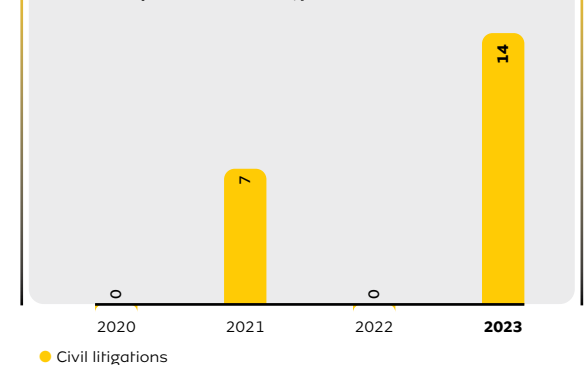
Authorities

- The Uganda Police Force.
- The Uganda Communications Commission.
- The National Information Technology Authority.
- The Bank of Uganda.
- The Ministry of Internal Affairs.
- The Ministry of ICT and National Guidance.
- Courts of law.
- Ministry of Justice and Constitutional Affairs.
- The Financial Intelligence Authority.
- The Personal Data Protection Office.
- Uganda People's Defence Forces.
- Internal Security Organisation.
- External Security Organisation.
- The Directorate of Public Prosecutions.
- Monitoring Centre established under the Regulation of Interception of Communications Act Uganda.

Requests from authorities



Requests from non-governmental entities



Zambia



Zambia

MTN has been present in Zambia since 2005 and has approximately 6.9m subscribers. In 2023, MTN's revenue in Zambia was R3.5bn.

Regulatory framework

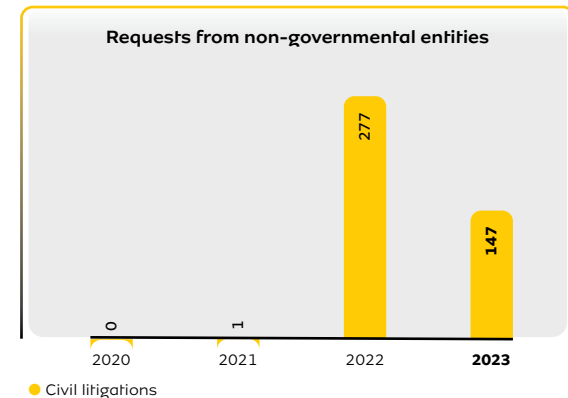
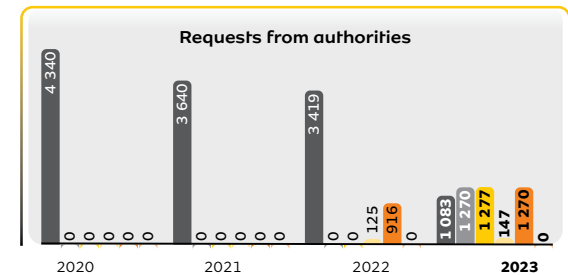
- The Constitution of Zambia (Amendment) Act No 2 of 2016 (the "Constitution of Zambia").
- The Cybersecurity and Cybercrimes Act No 2 of 2021 (the "Cybersecurity Act").
- The Electronic Communications and Transactions Act No 4 of 2021 (the "Electronic Transactions Act").
- The Data Protection Act No 3 of 2021 (the "Data Protection Act").
- The Financial Intelligence Centre Act No 46 of 2010, as amended by Act No 4 of 2016 and Act No. 16 of 2020 (the "Financial Intelligence Centre Act").



- The ZICTA Network Licence Standard Terms and Conditions.
- The ICT (Telecommunication Traffic Monitoring) Regulations Statutory Instrument No 80 of 2015, issued pursuant to the Electronic Communications and Transactions Act No 21 of 2009.
- The Children's Code Act No 12 of 2022 (the "Children's Code").
- The Electronic Communications and Transactions (General) Regulations, Statutory Instrument No. 71 of 2011 issued pursuant to the Electronic Communications and Transactions Act No 21 of 2009.
- The Access to Information Act No 24 of 2023 (the "Access to Information Act").

Authorities

- Zambia Information and Communication Technology Agency.
- Zambia Police Service.
- Anti-Corruption Commission.
- Zambia Security Intelligence Service established under the Zambia Security Intelligence Service Act, Chapter 109 of the Laws of Zambia.
- Drug Enforcement Commission.
- Human Rights Commission.
- Financial Intelligence Centre.
- Anti-Money Laundering Investigations Unit.
- Zambia Revenue Authority.
- Child Development Department.
- The office of the Data Protection Commissioner.



Glossary

Child sexual abuse material (CSAM)	CSAM has different legal definitions in different countries. The minimum defines CSAM as imagery or videos that show a person who is a child and engaged in or is depicted as being engaged in explicit sexual activity.
Digital human rights	Digital technologies provide new means to exercise human rights, but they are too often also used to violate them. Data protection and privacy issues, digital identity, the use of surveillance technologies, online violence and harassment are of particular concern (https://www.un.org/techenvoy/content/digital-human-rights).
Freedom of Expression (United Nations Articles)	Human rights due diligence. A continuous management process to identify, prevent, mitigate and account for how we address the adverse human rights address, manage and remedy potential adverse human rights risks.
GNI	Global Network Initiative.
GSMA	Global System of Mobile Communications.
Human rights impact assessment (HRIA)	An HRIA provides a consistent, efficient and systematic way to identify, prioritise and address human rights risks and opportunities at a corporate, country, site or product level. An HRIA is one part of a human rights due diligence system. Freedom of Expression (United Nations Articles). The use of digital communications to freely express views, opinions and information, informed by Article 19 of the United Nations Universal Declaration on Human Rights.
ICT	Information and communication technology
Information security	The preservation of confidentiality, integrity and availability of information. In addition, other properties such as authenticity, accountability, no-repudiation and reliability can also be involved.
IWF	International Watch Foundation.
Limitations on freedom of expression	This can assume numerous forms including interception, pausing, disrupting, service blocking, throttling, tracking, surveillance, slowing down or stopping/ shutting down, taking down content or otherwise intentionally disrupting communications from use or transmission for the purposes intended by users. Also see 'SRO'.
Mobile access	Ability to use voice, data, short messaging service (SMS) and internet services and receive, view or respond to communications via mobile networks.
Operating markets	Benin, Cameroon, Congo-Brazzaville, Côte d'Ivoire, eSwatini, Ghana, Guinea-Bissau, Guinea-Conakry, Liberia, Nigeria, Rwanda, South Africa, South Sudan, Sudan, Uganda and Zambia.

Personal information	Personal information is any factual or subjective information, whether recorded or not, about an identifiable, living natural person, and where applicable, an identifiable, existing juristic person, including but not limited to, information relating to an individual's ethnicity, race, social origin, nationality, colour, sexual orientation, age, disability, religion, conscience, belief, mental and physical wellbeing, colour and marital status; any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person; the biometric information of the person; the personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; the views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person; and Special Personal Information, as defined in the MTN Group Data Privacy and Protection Policy.
Privacy	The reasonable expectation of users that their digital communications and personal information is not used and shared for purposes other than as authorised, and that such communications and information are protected, secured and remain confidential between the user and recipient of communications.
RDR	Ranking digital rights.
Remedy	Counteract or make good any digital human rights harms that have occurred.
SRO	Service restriction orders.
Stakeholders	A person, groups of persons or institutions who are directly or indirectly affected by MTN, including those who may have interests in MTN's business activities and the ability to influence MTN's business outcomes, either positively or negatively.
UNGC	United Nations Global Compact.
UN Guiding Principles on Business and Human Rights	Principles universally established by the United Nations in 2011 that set out the duty of governments to ensure protection against human rights violations, the responsibility of corporates to respect human rights, and ensure access to effective judicial and non-judicial remedies for victims of human rights violations.
UN Sustainable Development Goals (UNSDG)	Goals adopted by all United Nations in 2015 with a vision to end poverty, protect the planet and ensure all people enjoy peace and prosperity by 2030.
UN Universal Declaration of Human Rights	Thirty articles proclaimed by the United Nations General Assembly on 10 December 1948 as the basic concepts of dignity, liberty and equality for all people and nations.

Administration

MTN GROUP LIMITED

Incorporated in the Republic of South Africa

Company registration number:

1994/009584/06

ISIN: ZAE000042164

Share code: MTN

Board of directors

MH Jonas[^]
KDK Mokhele[^]
RT Mupita¹
TBL Molefe¹
NP Gosa[^]
S Kheradpir^{2^}
SN Mabaso-Koyana[^]
SP Miller^{3^}
CWN Molope[^]
N Newton-King[^]
T Pennington^{4^}
NL Sowazi[^]
SLA Sanusi^{5^}
VM Rague^{6^}

¹ Executive

² American

³ Belgian

⁴ British

⁵ Nigerian

⁶ Kenyan

[^] Independent non-executive director

[#] Non-executive director

Group Company Secretary

PT Sishuba-Bonoyi
Private Bag X9955, Cresta, 2118

Registered office

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Fairland
Gauteng, 2195

American depository receipt (ADR) programme

Cusip No. 62474M108
ADR to ordinary share 1:1

Depository:

The Bank of New York Mellon
101 Barclay Street, New York NY, 10286, USA

MTN Group sharecare line

Toll free: 0800 202 360 or +27 11 870 8206
if phoning from outside South Africa

Transfer secretaries

Computershare Investor Services
Proprietary Limited
Registration number 2004/003647/070
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102 Rivonia Road, Sandton, Johannesburg,
South Africa, 2146

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35 Ballyclare Drive, Bryanston, 2021

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Date of release: 29 April 2024

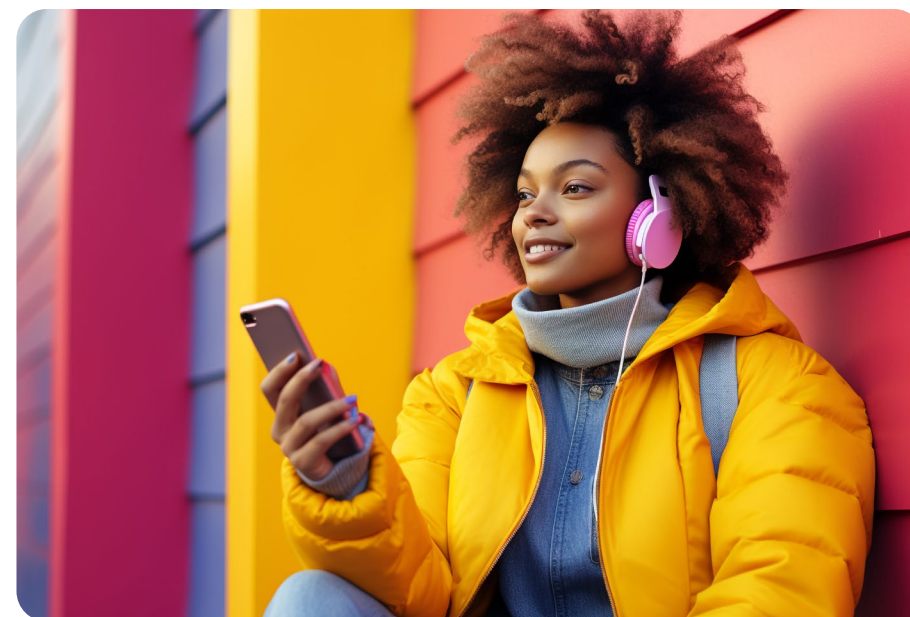
Forward-looking information

Opinions and forward-looking statements expressed in this report represent those of the company at the time. Undue reliance should not be placed on such statements and opinions because by nature, they are subjective to known and unknown risk and uncertainties and can be affected by other factors that could cause actual results and company plans and objectives to differ materially from those expressed or implied in the forward-looking statements.

Neither the company nor any of its respective affiliates, advisers or representatives shall have any liability whatsoever (based on negligence or otherwise) for any loss howsoever arising from any use of this report or its contents or otherwise arising in connection with this presentation and do not undertake to publicly update or revise any of its opinions or forward-looking statements whether to reflect new information or future events or circumstances otherwise.

Mapping our SDG impact:

In 2021, MTN Group implemented an SDG prioritisation tool to determine the SDGs and SDG Ambition Benchmarks on which we could deliver the biggest impact, while creating business value. It considers three dimensions – impact potential, strategic alignment and risk management potential – for which scores are attributed against defined qualitative criteria. The tool considers various internal and external assessments such as our risk register and industry research. It also incorporates stakeholder views collected through surveys, workshops and materially assessments. The results are then refined to ensure alignment with our strategy.





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