



MTN POSITION STATEMENT

Digital human rights

Introduction

Human rights risks exist throughout MTN's value chain, including those that directly affect the human rights of our customers and stakeholders. We endorse internet access as a human right, collectively with freedom of expression and opinion, the privacy of information and communication and information security. Some of our markets have inherent human rights risks, which we weigh against the impact of our vital communication services.

There is an increased focus on digital human rights and the economic impact of every major deliberate internet outage and social media shutdown worldwide. Our customers' human rights are addressed in a suite of policies, including digital human rights, data privacy and protection and information security.

Purpose

- The purpose of this policy is to set out MTN's position, principles, and due diligence approach to respecting the digital rights of its customers.
- We strive to do this in a manner that is cognisant of internationally recognised principles while attempting to ensure that MTN remains compliant with the terms of its various jurisdictional legal obligations and licence conditions.

MTN's approach

The following globally defined standards guide MTN:

- United Nations Universal Declaration on Human Rights.
- United Nations "Protect, Respect and Remedy" Framework and Guiding Principles.
- Africa Union Convention on Cyber Security and Personal Data Protection.
- ECOWAS Supplementary Act on Personal Data Protection.
- SADC Model Law on Data Protection.
- King IV on Corporate Governance.

MTN is a member of these key bodies:

- Signatory of the United Nations Global Compact.
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- Global Systems of Mobile Communications (GSMA) - Mobile Alliance Against Child Sexual Abuse Content and Sustainability Network includes Human Rights.
- Data Protection and Privacy Working Group.
- Centre for Internet Security.
- Information Security Forum.
- Global Network Initiative (GNI).
- Joint Audit Cooperation (JAC).
- Global Enabling Sustainability Initiative (GeSI).

MTN's approach to digital human rights

- Our approach to navigating human rights risks is rooted in our commitment to the principles of the UN Global Compact. The UN Guiding Principles on Human Rights states that where it is



necessary to prioritise actions to address actual and potential adverse human rights impacts, business enterprises should first seek to prevent and mitigate those that are most severe or where delayed response would make them irreparable.

- The concept of severity needs to guide our decision-making. We have a Digital Human Rights Strategy, Policy, and Toolkit in place to guide MTNers in dealing with incidents where our customers' digital human rights are threatened. The severity and complexity of the incidents vary, as does the application of our Digital Human Rights Policy and Toolkit.

MTN's key digital human rights principles

- MTN respects the rights of all persons and opposes any actions that undermine human rights and discriminate against people or may be contrary to our values and beliefs.
- We respect people's rights irrespective of race, ethnicity, colour, age, language, religion, gender, sexual orientation, political or other affiliation, ability, jurisdictional or international status.
- We believe in the rights of all people using digital communications to communicate and share information and opinions freely and to enjoy the right to privacy and information security without unlawful interference.
- We respect and endeavour to comply with the laws of the countries in which we operate.
- We strive to create platforms to enable stakeholders to discuss their concerns with us and to escalate their concerns where they believe their rights have been infringed.
- We value the trust that our customers place in us when they provide personal information. We endeavour to stipulate the data we capture, retain, process, use and provide to key stakeholders.
- We are committed to providing fair and equitable remedies should we cause an adverse impact on such rights.
- We work to limit the scope, extent, or duration of human rights impacts in instances where we do not have direct control by engaging with third parties, internet service providers, regulators or other stakeholders who may have control of and/or access to our facilities, infrastructure or services.
- We may restrict access to services where MTN owns, operates, or has technical control over online platforms in instances where the potential exists to harm the rights of people. Restrictions would be applied after assessing if the content is illegal or harmful as defined in prevailing national laws or the UN Universal Declaration on Human Rights.
- We do not prioritise, block, or delay certain types of traffic, applications, protocols, or content for reasons beyond assuring service quality and network reliability.
- MTN seeks solutions to reduce digital human rights risks and adverse impacts through stakeholder collaboration and engagement.

MTN's digital human rights due diligence framework

- MTN's due diligence framework has been drawn from the UN Guiding Principles for Business and Human Rights Framework ("Protect, Respect and Remedy").
- The framework, supported by a toolkit, outlines the steps all MTN operations should follow before, during and after a digital human rights incident.
- Incidents come in a request or instance where an authority or non-governmental entity approaches MTN regarding freedom of expression and opinion, data privacy and information security.
- This framework includes assessing potential incidents and potential impacts that may affect customers' rights and enabling our teams to respond to incidents through a clearly defined process, including identifying remedies for affected customers or stakeholders.



- The exact process is followed irrespective of whether it is a non-judicial government demand or court order from local or foreign government jurisdictions and private individuals.
- MTN will attempt to avoid adverse human rights impacts by exploring every possible alternative, including pushing back, where it identifies a risk of infringing these rights.
- MTN's due diligence approach is iterative and ongoing due to technology and regulation's complex and rapid evolution, considering the macro, social and political climate.

Grievance mechanism

- If our customers would like to exercise any of those rights or have any potential grievances, please get in touch with us at HumanRights@mtn.com
- Matters reported will be investigated and addressed, including appropriate action being taken where there have been violations.

Roles and responsibilities

- If our customers would like to exercise any of those rights or have any potential grievances, they can contact our customer services line or HumanRights@mtn.com.
- Matters reported will be investigated and addressed, including appropriate action being taken where there have been violations. We endeavour to provide remedies where applicable and for individuals whose rights have been harmed by our business activities.

Applicability and transparent reporting

- Our Digital Human Rights Policy applies to all our directors, officers, employees, and representatives of the Company, whether permanent, temporary or on contract.
- We expect our intermediaries, agents, contractors, suppliers and business partners to uphold the same standards.
- Our Supplier Code of Conduct outlines the minimum standards, including digital human rights, that each supplier of products or services must comply with.
- We are committed to transparency and disclosure regarding digital human rights at MTN.

Communication and training

MTN's Digital Human Rights Policy is shared with all employees of MTN's operating entities, subsidiaries and partners; the policy is translated into local languages as required. Detailed training is provided to employees and partners based on the extent of their roles and ability to impact and/or influence these rights.