



## MTN POSITION STATEMENT

### Responsible marketing

#### Introduction

MTN is committed to maintaining our brand's trusted position and integrity. All our communications with the public, including our marketing efforts, embody respect and a sense of responsibility. Our customers are at the centre of everything we do, and we strive to build strong, mutually beneficial relationships with them.

Our reputation and goodwill are vital assets contributing to MTN's long-term sustainability. MTN has built its brand focusing on social responsibility, transparency and creating value for all our stakeholders. MTN understands the need to not only state our belief – that everyone deserves the benefits of a modern, connected life – but is prepared to be evaluated against it and continuously demonstrate that our activities align with our mission.

#### Purpose

- Outline MTN's commitment to accurate, non-offensive, appropriate, consistent, and inclusive marketing efforts.
- Embed sufficiently robust processes to avoid any reputational damage.
- Ensure that MTN's marketing efforts, to the extent feasible, are representative and inclusive, aligning with our values of diversity and inclusion, free of violence, discrimination and harmful stereotypes.
- Define the requirements for marketing content across MTN.

#### MTN's approach

The following globally defined standards guide MTN:

- The South African Companies Act or equivalent Act that covers the relevant market in our respective operating geographies.
- King IV Code and Report on Corporate Governance on ensuring inclusion of all stakeholders.
- Johannesburg Stock Exchange Listings Requirements defining materiality of matters.
- Advertising Regulatory Board (ARB) in South Africa or relevant body in geographical markets.
- Code of Advertising Practice (South Africa) or relevant code in the market.
- International Advertising and Marketing Communications Code.
- Relevant advertising bodies' requirements and approvals.

#### MTN's approach to responsible marketing

We strive to ensure that our marketing activities are responsible, inoffensive, accurate, consistent, and appropriate within all our geographical markets. Our approach to responsible marketing covers all forms of advertising and marketing materials, including written, digital, social media, audio, verbal, electronic or any media platform.

All marketing is set out to be legal, decent, honest, truthful, and prepared with a sense of respect and responsibility to MTN's consumers and our stakeholders. Our marketing activities are clearly labelled as such. In our marketing activities, we avoid technical language and provide all the necessary information for consumers to understand the terms and conditions of our products and services.

Our marketing is set out to not incite or condone any form of violence or discrimination based on race, ethnicity, colour, age, language, religion, gender, sex, sexual orientation, culture, political or



other affiliation, disability, jurisdictional or international status of the country or territory of origin as outlined in MTN's Digital Human Rights Policy.

We are committed to creating marketing content that does not reinforce stereotypes. We commit to depicting people as empowered actors with progressive and multi-dimensional personalities and refrain from objectifying people.

Interactions with consumers are central components of MTN's marketing efforts. Engaging consumers to share their experiences, stories, and content through various forms and across different social media platforms is managed with transparency, authenticity, and respect for privacy rights.

## **Key principles of MTN's responsible marketing**

### **Societal, behavioural and environmental**

- MTN has a zero-tolerance approach to racism, discrimination and stereotyping of any form. All marketing should not appear to condone or incite violence, racism, xenophobia, or unlawful or anti-social behaviour.
- We do not permit marketing content that may influence children or exploit their natural trust, naivety, lack of experience or sense of loyalty.
- Our marketing content does not include messages or images promoting alcohol consumption, smoking, illegal drug use, eating disorders or terrorism in alignment with local and/or international law.
- We do not permit marketing material that contains any content that might reasonably be thought to encourage or condone cruelty or irresponsible behaviour towards animals.
- We are mindful of marketing activities' environmental implications, such as new product development, marketing activation plans, packaging and recycling.

### **Media, use of images/persons**

- MTN will endeavour to avoid broadcasting any advertising campaigns during programmes or on channels that are not aligned with our values.
- MTN will avoid using platforms that are not verified publishers or legally registered companies. MTN will also avoid selling any MTN mobile media to third parties we deem not to be aligned with our company values.
- We actively manage all usages and personality rights of creative talent in marketing activities and materials. We ensure that no material is used without approval/authorisation/licence or where clearances have expired and have not or may not be renewed.
- We ensure images used in marketing communications are not altered to render advertising misleading.

### **Product and service advertising**

- We describe our products/services truthfully, accurately and transparently, with appropriate factual information.
- We provide sufficient information for consumers and customers to understand how to use our products and services.
- We ensure marketing is based on adequate support evidence for any claims made.
- We respect people who choose not to buy our products and services and ensure sufficient information about our products and services for consumers to make informed choices.
- We comply with our licence obligations and applicable regulations and undertake all relevant training required.



- We use technical data, scientific terminology and vocabulary responsibly.
- We ensure the public is fully aware of the nature of any commitment they may enter due to responding to the advertisement.
- We do not describe products as "free" if there is any cost payable by a consumer except for delivery or postage costs.

### **Third parties, personal data and targeted marketing**

- Employees, contractors, consultants and agencies involved in MTN marketing activities must always comply with the MTN Responsible Marketing Policy and applicable marketing and/or advertising laws.
- We ensure that consumers understand and exercise their rights to regulate third-party marketing through mechanisms such as the opt-out option of direct marketing lists, rectifying personal data, requiring their personal data not to be made available to certain third parties or to be deleted, sign-on general direct preference services, as applicable.
- We permit third parties to target our clients with marketing activities only where clients consent or opt-in to receiving such marketing activities within the parameters of the agreed scope of services.
- We ensure that our targeted advertising content is clearly labelled, indicating that it comes from MTN directly.
- We will disclose the types, processes, and technologies MTN uses to undertake its targeted advertising where possible.
- We ensure that individuals are aware of the purpose of collecting personal data and that the usage of personal data is aligned with our policies and all applicable data privacy and protection regulations.

### **Roles and responsibilities**

- Our Board, through the Group Social, Ethics and Sustainability Committee, oversees the Group's actions and performance regarding responsible marketing.
- The Group's Executive Committee is responsible for policy implementation and identifying, addressing, and remedying responsible marketing risks driven by the Group Brand Marketing function, in line with the MTN's policy.

### **Applicability and transparent reporting**

- Our Responsible Marketing 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 responsible marketing, that each supplier of products or services must comply with.
- We are committed to transparency and disclosure regarding responsible marketing at MTN.

### **Communication and training**

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



## **Definitions**

**Marketing** - The action or business of promoting and selling products or services, including market research and advertising.

**Advertising** - Any piece of marketing communications on any media (including but not limited to print, digital, audio or video) produced which promotes directly or indirectly the MTN brand and/or products.