



MTN POSITION STATEMENT

Responsible Mobile Advertising and Sales

Introduction

At MTN, we are committed to upholding responsible mobile advertising practices to create positive and meaningful experiences for our customers. We recognise the power of mobile advertising in engaging our audience. Equally, we acknowledge the responsibility we have to respect customer rights, privacy and dignity.

Our commitment lies in fostering transparency, protecting users' personal information and delivering advertising content that is relevant and abides by local laws and cultural sensitivities. MTN commits to ensuring that advertising content carried on its platforms is not harmful, particularly to children and other vulnerable groups.

Purpose:

- Define MTN's principles and framework for responsible mobile advertising and direct marketing.
- Reinforce our commitment to transparency, customer protection and compliance with local and international regulations.
- Establish clear requirements for advertising and promotional content all MTN platforms.
- Acknowledge the importance of mobile advertising in engaging with audiences while maintaining a firm commitment to respecting local laws, human rights and data privacy.

MTN's approach:

MTN follows a responsible and structured approach to mobile advertising, guided by the following standards and frameworks:

- The International Advertising and Marketing Communications Code.
- The Interactive Advertising Bureau.
- Advertising Regulatory Board (ARB) in South Africa or equivalent codes in each operating market.
- Relevant regulatory requirements and approvals in each jurisdiction.
- King IV™ Code on Corporate Governance.

MTN's approach to mobile advertising direct marketing is to ensure a responsible framework for the delivery of advertising and promotional content which not only protects MTN customers from accessing inappropriate content but also protects against damage to MTN's reputation. The framework we provide assists advertisers and MTN operating companies in complying with applicable international and local laws.

Key objectives:

- **Customer privacy protection:** MTN is committed to safeguarding customer privacy and complies with all applicable data protection laws. Customer data is used ethically, lawfully and only for clearly defined advertising purposes.
- **Relevance and personalisation:** We strive to deliver advertising content that aligns with our customers' preferences and needs. Content personalisation is conducted with informed consent and excludes the use of sensitive data (e.g. information related to the customer's gender identity, sexual orientation, political beliefs, health status, etc.). Targeting is informed by non-sensitive insights such as demographics, device usage and lifestyle patterns. MTN does not restrict users' access to information through advertising.
- **Protection from discrimination:** MTN Mobile Advertising is governed by prevailing legislation at an operating market level to ensure compliance with local



advertising laws, customs and sensitivities. These preclude discrimination based on race, ethnicity, religion, gender, sexual orientation, political involvement.

All advertising must pass through a mandatory approval process, where all advertising copy, creatives and click-throughs are vetted in accordance with the advertising code of conduct. Any advertising deemed in violation of the code of conduct is not published.

Data privacy & security commitments:

In line with best practice, MTN commits to:

- Notifying data subjects and customers promptly of policy changes or data breaches.
- Adopting leading data protection standards and advertising standards that are suitable for a general audience and comply with:
 - Local laws in each market
 - All laws of foreign origin e.g. GDPR and CCPA which govern how citizens' data is used regardless of their location
 - Local advertising codes (eg. Oath of Advertising Practice).
- Collecting and processing data lawfully and transparently, with explicit consent where required.
- Limiting the use of data to the purposes disclosed to users.
- Providing clear, accessible terms about data collection, use, sharing, retention and third-party transfers.
- Requiring all third parties handling user data to comply with MTN's data protection policies and procedures, including enforcement measures for non-compliance.

Disclosure of information

Customer-facing notices and terms and conditions in activated markets (South Africa, Nigeria, Cameroon, Côte d'Ivoire, Ghana, Uganda and Sudan) have been updated to indicate that MTN may share anonymised data to deliver relevant advertising. All mobile advertising integrations are subject to internal approvals from the Legal and Regulatory, Security, BI and POPIA or Data Privacy teams as necessary at operating market level.

With regards to "Unsolicited" advertising (e.g. targeted SMS), we ensure this:

- Adheres to all mandatory opt-in or opt-out legislation governing the delivery of "Unsolicited" advertising, by integrating to the operating market blacklist/whitelist to ensure adherence to these rules.
- Respects all blackout periods (hours and days) during which ads cannot be delivered.
- Adheres to all "frequency capping" requirements which govern the frequency and mandatory intervals between campaigns at a platform level.
- Includes mandatory opt-out messaging in all unsolicited campaigns (e.g., "To opt out, send STOP to 123").
- Complies with regional (national) watershed regulations (e.g., No alcohol advertisements before 5pm.)
- Ensures advertisers targeting sensitive categories (e.g. alcohol) comply with public protection standards (e.g., No under-18s)

Handling of sensitive customer data

MTN does not disclose any personally identifiable or sensitive information (e.g. health status, sexual orientation, political affiliation) to third parties for advertising purposes.

Our advertising operations adhere to the Mobile Marketing Association (MMA) Code of Conduct and the governance framework of the Interactive Advertising Bureau (IAB) Association. As a member of these industry bodies, MTN ensures compliance with local, regional and international regulations governing data, inventory and advertising practices. Robust security protocols and access controls are in place to ensure that all customer data is handled responsibly and lawfully.



Governance oversight

MTN's governance framework ensures that mobile advertising aligns with our strategy and values. Oversight is provided by the MTN Group Executive Committee and the Board of Directors. The MTN Mobile Advertising business falls within the Group Digital Services unit, which reports to the Group Chief Commercial Officer.

Communication and training programmes:

To promote transparency and accountability, MTN delivers comprehensive training to all employees involved in advertising, data handling and compliance. These programmes focus on:

- Data protection and proper handling of customer data.
- Legal and regulatory frameworks governing mobile advertising.
- Responsible advertising practices, with a focus on transparency and customer trust.
- Advertising masterclasses on trends, best practices and real-world case studies.
- Active engagement with industry regulators and bodies.

Conclusion

By adhering to these principles, commitments, responsibilities and advertising training programmes, MTN aims to set a benchmark for responsible mobile advertising and direct marketing. Our commitment to transparency, user privacy and protection will strengthen our relationships with customers, driving long-term sustainable growth and ensuring a positive impact on the mobile advertising landscape.