



## MTN POSITION STATEMENT

### Responsible Artificial Intelligence (AI)

#### Introduction

MTN is committed to the responsible, ethical and transparent use of AI. All AI applications across our operations are required to comply with international regulatory standards, local laws, internal governance protocols and ethical guidelines. Our Responsible AI Policy ensures that AI systems uphold privacy rights, minimise human rights risks and remain firmly aligned with MTN's core values and strategic intent.

#### Purpose:

The purpose of this position statement is to:

- Affirm MTN's commitment to regulatory and ethical standards in the development, deployment and use of AI technologies, ensuring compliance with international laws and best practices.
- Provide clear guiding principles for responsible AI governance, promoting transparency, ethics, accountability and fairness throughout the AI lifecycle, aligned with MTN's values.
- Embed Responsible AI governance principles across our operations, ensuring fairness, accountability in AI design, deployment and oversight.
- Align AI applications with MTN's core values, ESG priorities and long-term digital transformation goals.

#### MTN's approach:

MTN's Responsible AI approach is informed by the following:

- **Ethical and inclusive designs** – MTN is committed to AI practices that prioritise fairness, transparency, privacy, security, human rights and accountability, fostering trust and ensuring respectful AI usage. We design AI applications that are transparent and inclusive.
- **Regulatory and internal standards** – MTN ensures all AI deployments comply with local and international laws and governance standards across all markets, emphasising adherence to intellectual property, copyright, data privacy and security requirements. Our internal governance mechanisms ensure that AI systems are reviewed, tested and monitored for compliance and impact.
- **Stakeholder understanding and engagement** – MTN fosters a culture of AI awareness through ongoing education and stakeholder engagement. We promote ethical AI literacy across our workforce and proactively engage regulators, industry partners and communities to co-create responsible digital ecosystems.

Our Responsible AI initiatives are anchored in the BRaiN framework, a structured governance model that balances innovation with ethics, accountability, transparency, and continuous improvement.

Furthermore, MTN's Responsible AI approach is subject to the local laws applicable to MTN Group and its operating companies or subsidiaries. Where any inconsistency arises between this policy and local law, the provisions of local law shall prevail.



### Key objectives:

- To define the minimum governance and safety requirements applicable to all AI system deployments across MTN. These principles, supported by the BRaiN framework, ensure consistent, responsible AI practices throughout the organisation. To enable comprehensive governance and oversight of AI systems through the BRaiN framework, which sets the foundation for ethical, strategic, and safe AI adoption. Each pillar of the BRaiN framework serves as a foundational guideline:
  - **(B)alance:** Promote a balanced approach between innovation and safety in AI development and use. AI initiatives must align with MTN's strategic priorities, ensuring a responsible balance between innovation and ethical considerations. This principle emphasises the importance of strategic alignment, human oversight, adaptive governance and risk management to foster a controlled approach to AI development and implementation.
  - **(R)esponsibility:** Ensure accountability for AI decisions and actions, emphasising responsible development and deployment. MTN is committed to embedding accountability throughout the AI lifecycle, from inception to deployment. This principle holds individuals and teams accountable for maintaining the integrity, compliance and ethical alignment of AI systems with MTN's values and regulatory obligations.
  - **(a)wareness:** Increase awareness of AI capabilities and limitations among stakeholders to foster informed usage and expectations. MTN prioritises a comprehensive understanding of AI capabilities, risks and limitations across all stakeholders. This principle supports the education of employees, customers and partners on responsible AI use, ensuring that AI interactions are informed, fair and transparent.
  - **(i)ntegrity:** Maintain high ethical standards and integrity in all AI operations, ensuring that AI systems operate transparently and fairly. High ethical standards are integral to MTN's AI operations. This principle mandates that AI systems operate transparently and fairly, upholding stakeholder trust and ensuring that AI outcomes are unbiased, secure and compliant with regulatory standards.
  - **(N)urturing:** Support a culture of continuous learning and improvement in AI safety and ethics, nurturing a positive relationship between AI and society. MTN fosters a culture of continuous learning, adaptation and improvement in AI ethics and safety. This principle promotes the development of AI literacy, the nurturing of ethical practices and the enhancement of workforce capabilities to ensure sustainable and responsible AI evolution within MTN.

### Governance oversight

Our governance framework is integral in supporting the business and helping us deliver on our strategy. The Board of Directors and the Social, Ethics and Sustainability Committee have oversight over the Group's actions and performance regarding Responsible AI across the various functions.

At the operational level, the Executive Committee of each operating company is responsible for ensuring compliance with the MTN Responsible AI Policy and with applicable local legislation, rules, and standards.

### Communication and training programmes:

MTN Directors and employees have access to our Responsible AI policies and receive regular communications regarding Responsible AI governance updates, procedures, and expectations. Employees are educated on responsible AI use, as well as on applicable regulations, ethical



standards, and governance procedures. Regular training sessions focus on the ethical principles, responsible design practices, and governance standards of AI, reinforcing alignment with MTN's values and Responsible AI framework. MTN actively engages with industry regulators and associations to contribute to the shaping of responsible AI ecosystems across the regions in which we operate.