



MTN position statement

Human rights

Introduction

Human rights risks exist throughout MTN's value chain and include those risks that directly affect the human rights of our customers and stakeholders. MTN is committed to respecting and protecting human rights within its markets and sphere of influence. We recognise that our digital products and services play a critical role in advancing and protecting human rights. We strive to provide these products and services in a manner that does not impede or infringe on the rights of people. We undertake to respect human rights in the course of our business activities and within the markets in which we operate.

Purpose

- Demonstrate MTN Group's commitment to human rights by providing a consolidated view of existing policies and frameworks that address the management of various human rights themes.
- Provide an overview of the governance and management structures for effectively implementing human rights principles applicable to the Group.
- Enable the Group to respond to and advance sustainable development principles while demonstrating performance and progress.

MTN's approach

MTN is guided by, *inter alia*, the following globally defined standards:

- The United Nations Universal Declaration on Human Rights.
- The African Charter on Human and People's Rights (Organisation of African Unity, 1986).
- International Covenant on Civil and Political Rights, United Nations, 1966.
- International Covenant on Economic, Social and Cultural Rights, United Nations, 1966.
- ILO Declaration on Fundamental Principles and Rights at Work, International Labour Organization, 1998.
- The United Nations "Protect, Respect and Remedy" Framework and Guiding Principles, 2011.
- OECD Responsible Business Conduct and Human Rights Principles, 2011.
- United Nations Global Compact Principles.
- Global Network Initiative Principles.
- Global Reporting Initiative Sustainability Reporting Standards.
- Elimination of All Forms of Racial Discrimination; Elimination of All Forms of Discrimination against Women; Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment; Rights of Persons with Disabilities; Rights of the Child; Violence and Harassment in the World of Work.

MTN is a member of, or signatory to, various organisations or agreements which are intent on advancing and/or protecting human rights. These include, but are not limited to, the following:

- The United Nations Global Compact.
- GSMA's Mobile Alliance Against Child Sexual Abuse Content.
- Global Network Initiative (GNI).
- Joint Alliance for Corporate Social Responsibility (JAC).
- Global enabling Sustainability Initiative (GeSI).

Commented [HG1]: The organisation is now known simply as the GSMA, fyi



MTN Group's human rights approach

- We address our stakeholders' human rights in a suite of policies and position statements, including those related to digital human rights, data privacy and protection, labour, diversity and inclusion, and information security.
- MTN is committed to respecting and protecting human rights within our 'sphere of influence' and to making sure we are not complicit in human rights abuses.
- We embrace the notions of our people's inherent worth, equality and dignity. We understand that our digital products and services are critical in advancing and protecting human rights.
- We are committed to operating within the legal and regulatory frameworks of our operating markets.
- We strive to provide products and services in a manner that does not impede or infringe on the rights of our people.
- We seek to incorporate human rights principles in our value chain.
- We use a human rights due diligence process to identify, prevent and mitigate the violation of human rights.
- MTN's due diligence approach is iterative and ongoing due to the complex and rapid evolution of technology and regulation, considering the macro, social and political climate.
- We are committed to providing fair and equitable remedies should we cause an adverse impact on such rights. We have various grievance mechanisms in place to enable stakeholders to discuss their concerns with us.
- We seek ways to honour internationally recognised human rights principles, even when faced with conflicting requirements. We respect and endeavour to comply with the laws of the countries in which we operate.
- In instances in which we do not have direct control of an operation or activity, we work to limit the scope, extent or duration of human rights impacts 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.
- By engaging and collaborating with our stakeholders, MTN seeks solutions to reduce digital human rights risks and adverse impacts.

Key principles of MTN's human rights

- MTN respects the rights of all persons and opposes any actions that undermine people's human rights and that 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 respect people's right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any product and services, regardless of frontiers.
- We believe that no one should be forced, bonded or subjected to compulsory labour, human trafficking, child labour and other kinds of slavery and servitude.
- We believe that no one should be subjected to torture or cruel, inhuman, or degrading treatment or punishment.
- We believe everyone has the right to freedom of peaceful assembly and association across our operations and supply chain.

Commented [HG2]: Surely we don't need to add 'in our operations or supply chain'? I suggest deleting it because I'm sure we believe this full stop!



Our operations, products and services

- We understand that our digital products and services play a critical role in advancing and protecting human rights.
- 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.
- MTN is committed to processing personal information honestly, ethically, transparently, with integrity, and in a manner that is always consistent with applicable laws and our values. We endeavour to stipulate to relevant stakeholders the data we capture, retain, process, use and provide to third parties.
- We encourage a human rights-centric approach to developing and applying new and emerging technologies and on the conception, design, use, further deployment and conduct impact assessments of new and emerging digital technologies.
- We assess the actual and the potential positive and adverse human rights impacts when making substantial changes to existing offers, entering new markets or in anticipation of changes in our existing operating environments, as well as when considering new partnerships/acquisitions.
- We are committed to protecting children's rights and making the internet a safer place for children and preventing harm. MTN has a zero-tolerance approach to the abuse and exploitation of children. We are a signatory of the GSMA Mobile Alliance Against Child Sexual Abuse Content and Internet Watch Foundation, which commits to removing such content.

Commented [HG3]: Or would 'customers' suffice?

Our employees

- We are committed to respecting every person's right to provide and/or refuse to provide labour; free choice of employment; and to just, favourable and fair conditions of employment. We make every endeavour to comply and adhere to all employment laws and regulations applicable as they may change from time to time.
- We are committed to ensuring the health, safety and wellbeing of all our employees. To that end, we provide safe working conditions and have policies in place to ensure that employees and various other stakeholders within our premises are safe. Those working for or on behalf of MTN are expected to conduct themselves in a manner that does not endanger their own safety and the safety of others.
- We believe that all employees have the right to be treated with respect, dignity and be provided with a work environment that is free of any form of harassment and discrimination of any nature. To that end, MTN Group has a zero-tolerance to behaviour, conduct and attitude that is inconsistent with its anti-harassment and anti-discriminatory policies and practices.
- We recognise the rights of employees to join trade unions of their choice and engage in collective bargaining in accordance with applicable laws and collective bargaining agreements.
- We have a Code of Conduct and various other governance policies and processes that emphasise our commitment to demonstrate an acceptable standard of ethical behaviour and conduct that is always consistent with our values.

Our suppliers, vendors and other third parties

- We expect our suppliers and business partners to uphold the same standards driving sustainable business practices and aiming for the highest ethical conduct enshrined in our Supplier Code of Conduct. Our Supplier Code of Conduct requires them to meet our human rights standards.
- Through JAC, we conduct supply chain audits to ensure that our suppliers adhere to our Code of Conduct and adopt human rights principles.



- We strive to monitor the extent of human rights risks relating to conflict minerals¹ and cobalt within our supply chain. We recognise the risks associated with conflict minerals used throughout the global electronics industry. We expect our suppliers to take steps to ensure conflict minerals are not used in any of the equipment related to our supply chain.

Our communities

- We remain committed to active engagement and transparent consultation with members of the community and our stakeholders including vulnerable groups as we undertake new site builds or during the running of our operations.
- We value diversity and promote inclusion while not tolerating discrimination and/or harassment when engaging with our local communities.
- We conduct our business in an ethical, transparent, accountable and fair manner. MTN adopts a zero-tolerance approach towards bribery, corruption or any other associated act within the public or private sector.

Grievance mechanism

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.

Roles and responsibilities

- Our Board of Directors – through the Group Social, Ethics and Sustainability Committee – oversees the Group's actions and performance regarding digital human rights.
- The Group's Executive Committee is responsible for policy implementation and for identifying, addressing and remedying human rights risks, driven by the Group Sustainability and Corporate Affairs Function, in line with the MTN's policy.

Applicability and transparent reporting

- Our 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.
- We are committed to transparency and disclosure regarding human rights at MTN.
- We endeavour to monitor and communicate how impacts are addressed.

Communication and training

- MTN's 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.

Commented [HG4]: Just to confirm that we have a policy, not just a position statement?

¹ Tin, tantalum, tungsten and gold, also called 3TG metals and cobalt