



MTN POSITION STATEMENT

Digital Human Rights

The issue

Human rights risks exist throughout MTN's value chain, including risks that directly affect the rights of customers and stakeholders. MTN endorses internet access as a human right, together with freedom of expression and opinion, privacy of information and communication, and information security. In some markets, inherent human rights risks must be weighed against the impact of providing vital communication services. Increasing global attention on digital human rights, including the effects of deliberate internet outages and social media shutdowns, highlights the importance of protecting the digital rights of the people we serve.

This understanding is consistent with MTN's commitment to respect internationally recognised human rights as reflected in MTN's Digital Human Rights Policy.

Linking the issue to our strategy

MTN has identified key human rights risks relevant to our digital services to include discrimination, privacy and security breaches, and freedom of expression limitations.

MTN's approach is guided by internationally recognised principles, including the UN Universal Declaration of Human Rights, the UN Protect, Respect and Remedy Framework and Guiding Principles, and regional data-protection instruments. The Digital Human Rights Policy reaffirms MTN's commitment to respecting human rights in line with the UN Global Compact.

The UN Guiding Principles hold that companies should prioritise the prevention and mitigation of human rights impacts that may become irremediable if not swiftly addressed. MTN applies this principle through its Digital Human Rights Strategy, Policy and Toolkit, which guide decision-making where customers' digital rights may be affected and outline remedies for implicated stakeholders.

Scope

This position applies to all MTN operating companies, directors, officers, employees, contractors and representatives, whether permanent, temporary or on contract. MTN also expects intermediaries, agents, suppliers, business partners and contractors to uphold the same standards.

This reflects the scope of application defined in MTN's Digital Human Rights Policy.

Our commitments

Direct operations

MTN commits to:

- Respecting the rights of all persons and opposes actions that undermine human rights or discriminate on grounds including race, ethnicity, colour, age, language, religion, gender, sexual orientation, political or other affiliation, ability, jurisdictional or international status.
- Believing people using digital communications have the right to communicate and share information and opinions freely and to enjoy privacy and information security without unlawful interference.
- Working to comply with the laws of the countries in which it operates.
- Valuing the trust customers place in the company when providing personal information and stipulates the data that MTN captures, retains, processes, uses and provides to stakeholders.



- Restricting, where possible, access to services on platforms it owns, operates or technically controls only where there is potential for harm to people's rights, and only after assessing whether content is illegal or harmful in terms of national laws or the UN Universal Declaration of Human Rights.
- No prioritising, blocking or delaying traffic, applications, protocols or content beyond what is required to ensure quality of service and network reliability.
- Co-operating in remediation where MTN identifies we have caused or contributed to an adverse human rights impact.

Value chain

MTN commits to:

- Enabling stakeholders to raise concerns and escalate them where they believe their rights have been infringed.
- Limiting the scope, extent or duration of human rights impacts in situations where the company does not have direct control, including through engagement with third parties, regulators, internet service providers or others with access to MTN's services or infrastructure.
- Expecting suppliers and third parties to comply with human rights requirements in line with the MTN Supplier Code of Conduct.

Systems change

- 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 outlines steps for all operations before, during and after a digital human rights incident, including assessing impacts and identifying remedies for affected stakeholders.
- MTN applies the same due diligence process whether incidents arise from non-judicial government demand, a court order from local or foreign jurisdictions or private individuals.
- MTN will seek to avoid negative human rights impacts by exploring alternatives, including pushing back, where risks to people's rights are identified.
- MTN acknowledges that its due diligence approach must remain iterative and ongoing because technology, regulation and the sociopolitical environment evolve continuously.
- MTN contributes to and participates in relevant bodies of which it is a member, including:
 - United Nations Global Compact (UNGC)
 - Global System for Mobile Communications Association (GSMA)
 - Sustainability Network, including Human Rights
 - Data Protection and Privacy Working Group
 - Centre for Internet Security
 - Information Security Forum

Accountability

- MTN's Board, through the Group Social, Ethics and Sustainability Committee, oversees actions and performance regarding digital human rights.
- The Group Executive Committee is responsible for implementing policy and identifying, addressing and remedying human rights risks.
- MTN provides detailed training to employees and partners based on the role they play and their ability to influence digital human rights.
- MTN is committed to transparency and disclosure regarding digital human rights, including reporting on incidents and trends where appropriate.
- MTN commits to ongoing improvement of our Digital Human Rights approach.