



MTN POSITION STATEMENT

Gifts, Hospitality and Entertainment

The issue

MTN recognises the importance of fostering and maintaining good relationships with stakeholders, including in cultural contexts where gift giving and entertainment are customary. However, gifts, entertainment and hospitality may be susceptible to abuse or misuse if not carefully controlled and may be intended or perceived to improperly influence business decisions. Excessive or inappropriate gifts, entertainment or hospitality can create the appearance of impropriety, lead to misunderstandings and expose MTN to reputational, legal and ethical risks. MTN therefore recognises the need to ensure objective and fair dealing in all business relationships.

Linking the issue to our strategy

MTN's strict 'no gifts' policy supports our commitment to fair dealing, ethical conduct, transparency and a zero-tolerance approach to fraud, bribery and corruption. Ensuring that gifts, entertainment and hospitality are appropriately managed and declared enables MTN to protect its reputation, prevent conflicts of interest and maintain objective relationships with customers, third parties and public officials.

This approach aligns with MTN's legal and reputational responsibility to act with due skill, care and diligence and to ensure business decisions are not influenced by the offer or acceptance of gifts, entertainment or hospitality.

Scope

This position statement applies to MTN Group and all its operating companies, and to all employees and representatives of MTN, whether permanent, temporary or on contract. It also applies to third parties contracted by MTN, where gifts, entertainment or hospitality are offered to, given by or received on behalf of MTN. This position statement aligns with and supports the MTN Group Code of Ethics and Conduct.

Our commitments

Direct operations

MTN commits to:

- Enforcing a strict no-gifts stance, except in limited circumstances provided for in policy.
- Ensuring all gifts, entertainment and hospitality, whether offered, accepted or declined, are declared in the Gifts, Entertainment and Hospitality Register via MTN's declaration processes.
- Prohibiting the acceptance of any gift, entertainment or hospitality where there is an expectation of an improper advantage or desirable outcome in return.
- Making certain that gifts, entertainment and hospitality do not improperly influence judgement or decision-making in business transactions.
- Requiring that any permitted exceptions be recorded and approved in line with applicable governance requirements.



Value chain

MTN commits to:

- Applying the same gifts, entertainment and hospitality standards to interactions with customers, suppliers and other third parties.
- Prohibiting the acceptance or offering of cash or cash equivalents under any circumstances.
- Prohibiting gifts or entertainment that are frequent, lavish, involve adult entertainment or otherwise create an inappropriate obligation.
- Exercising particular care when engaging with government or public officials, recognising the heightened risk of bribery and corruption.
- Ensuring engagements with third parties reflect MTN's commitment to integrity, objectivity and ethical conduct.

Systems change

MTN commits to:

- Making sure gifts, entertainment and hospitality practices are managed in a manner that supports objective relationships and fair dealing.
- Embedding controls to identify, manage and mitigate ethical and corruption risks associated with gifts, entertainment and hospitality.
- Upholding transparency and consistency across all markets while recognising differing legal and cultural contexts.

Accountability

- MTN maintains records of declared gifts, entertainment and hospitality to support transparency and oversight.
- Compliance with the Gifts, Hospitality and Entertainment Policy is mandatory across the organisation and applies to third parties where relevant.
- Oversight of ethical risk, including gifts and entertainment, is exercised through MTN's governance structures.
- MTN continuously monitors, reviews and improves its approach to gifts, entertainment and hospitality to ensure alignment with applicable laws, ethical standards and evolving risk expectations.