



MTN POSITION STATEMENT

Political Contributions

The issue

MTN operates across diverse political and socio-economic environments, where engagement with political entities is an inevitable part of doing business. Political parties play a central role in democratic systems and require resources to fulfil that role. However, political contributions also carry risks, including the potential for corruption, undue influence, reputational harm and the perception of bias. MTN recognises the importance of engaging responsibly, transparently and in ways that uphold democratic values, good governance and the stability of the societies in which we operate.

MTN is cognisant of the risks associated with secrecy, undue influence and corruption in political party funding and recognises the importance of transparency in all political contributions.

Linking the issue to our strategy

The sustainability of MTN's business is closely tied to the stability and prosperity of our markets. Ethical corporate citizenship, transparency, integrity and social purpose underpin MTN's engagement with governments and political parties. Our approach to political contributions is designed to support well-capacitated, multi-party political systems through limited in-kind donations provided in the ordinary course of business, while mitigating corruption risks by prohibiting cash donations.

The policy aligns with domestic legislation, internationally recognised principles of good governance and key MTN governance instruments, including King IV Principle 2 (ethical culture) and Principle 3 (responsible corporate citizenship), the MTN Conduct Passport and MTN's Anti-bribery, Stakeholder Management and Corporate Social Responsibility policies.

MTN does not seek to influence, benefit or gain any competitive advantage through political contributions and adopts a non-partisan approach in all engagements.

Scope

This position statement applies to MTN Group and all its operating companies, directors, executives, employees and representatives, across all territories in which MTN operates. It also applies to political contributions made on MTN's behalf by third parties acting for or representing the Group. This position statement aligns with and supports the MTN Group Code of Ethics and Conduct.

Our commitments

Direct operations

MTN commits to:

- Not making cash donations to political parties under any circumstances.
- Making limited in-kind donations – consisting of goods or services provided in the ordinary course of business – to political parties in eligible countries, in line with domestic legislation.
- Offering contributions to political parties represented in the national legislature, broadly proportional to the size of their representation and subject to authorised limits.
- Considering reputational and other undue risks when determining whether to provide in-kind political support.
- Preventing its name or logo from being used for political purposes.



- Respecting the rights of employees and directors to participate in political activities in their personal capacity, provided such activities are undertaken in their own time and clearly separated from MTN.

Value chain

MTN commits to:

- Distributing in-kind contributions in a non-partisan manner, which may be withheld where there is a risk of reputational damage or other undue risk to MTN.
- Ensuring engagements with political parties are conducted with the highest standards of ethical conduct and do not compromise MTN's values, integrity or reputation.

Systems change

- MTN contributes to the stability of democracies by supporting multi-party political participation through transparent, non-partisan in-kind support.
- Engagements are guided by principles of integrity, transparency, leadership, innovation and social purpose, consistent with King IV and MTN's internal governance frameworks.

Accountability

- MTN maintains a Political Contributions and Donations Register and discloses political contributions in line with applicable legal requirements, including disclosure in MTN's public reporting.
- The MTN Board, through the Group Social, Ethics and Sustainability Committee, oversees the Group's actions and performance regarding political contributions.
- The Executive Committee is responsible for implementation of the policy, supported by the Group sustainability and corporate affairs function.
- MTN is committed to transparency, oversight and ongoing review of its approach to political contributions to maintain alignment with applicable laws, governance standards and ethical expectations.