



## MTN POSITION STATEMENT

### Responsible Artificial Intelligence

#### The issue

MTN recognises that the use of artificial intelligence (AI) presents significant opportunities, alongside ethical, regulatory and human rights considerations. MTN is committed to the responsible, ethical and transparent use of AI and requires that all AI applications across its operations comply with international regulatory standards, local laws, internal governance protocols and ethical guidelines. MTN's Responsible AI Policy and Playbooks ensure AI systems uphold privacy rights, minimise human rights risks and remain aligned with MTN's core values and strategic intent.

#### Linking the issue to our strategy

MTN's Responsible AI approach supports our long-term digital transformation goals, ESG priorities and strategic intent. Responsible AI governance principles are embedded across MTN's operations to promote transparency, ethics, accountability and fairness throughout the AI lifecycle. AI applications are aligned with MTN's values and designed to balance innovation with safety, ethics and regulatory compliance. Among other benefits, this will establish our trust and reputation when engaging with customers, employees, industry regulators and society at large.

MTN's Responsible AI initiatives are anchored in the BRaiN framework, a structured governance model that balances innovation with ethics, accountability, transparency and continuous improvement across the AI lifecycle. The BRaiN framework incorporates internationally recognised regulatory and industry best practices to support ethical, compliant and risk-based AI development and deployment.

MTN's Responsible AI approach is subject to applicable local laws across MTN Group and its operating companies and subsidiaries, and where inconsistencies arise, the provisions of local law prevail.

#### Scope

This position statement applies to the development, deployment and use of AI technologies across MTN Group and its operating companies and subsidiaries. It reflects the intent and application of MTN's Responsible AI Policy and applies to all AI systems deployed or used within MTN's operations, subject to local legal and regulatory requirements. Where AI systems are deployed through vendor partners, such systems are subject to monitoring, auditing and reporting mechanisms, which may be incorporated into contractual agreements to maintain compliance with MTN's Responsible AI Policy and governance standards.

#### Our commitments

##### Direct operations

MTN commits to:

- The responsible, ethical and transparent development, deployment and use of AI technologies.
- Ensuring AI systems comply with international regulatory standards, local laws, internal governance protocols and ethical guidelines, including requirements relating to data privacy, security, intellectual property and copyright.
- Designing AI applications that prioritise fairness, transparency, privacy, security, human rights, accountability, trust and ethical AI usage.



- Reviewing, testing and monitoring AI systems in line with MTN's governance standards and the BRaiN framework to ensure compliance, ethical alignment and impact management throughout the AI lifecycle.
- Aligning AI initiatives with MTN's strategic priorities and core values.
- Reviewing, testing and monitoring AI systems.
- Promoting transparency and explainability in the use of AI systems and embedding appropriate human oversight to support accountability and ethical decision-making.

### **Governance and oversight**

MTN commits to:

- Defining minimum governance and safety requirements applicable to all AI system deployments across the organisation.
- Enabling comprehensive governance and oversight of AI systems through the BRaiN framework, which provides a foundation for ethical, strategic and safe AI adoption.
- Embedding accountability for AI decisions and actions across the AI lifecycle, from design and development through to deployment and ongoing use.
- Ensuring human oversight, adaptive governance and risk management in AI development and implementation.
- Applying a risk-based approach to the governance of AI to identify, assess and mitigate potential ethical, legal and human rights risks.
- Adopting a risk-based approach whereby AI systems developed or purchased are classified according to their level of risk, informed by recognised regulatory guidance, with governance and oversight requirements aligned to the applicable risk categorisation.
- Maintaining monitoring approaches that incorporate incident detection and response processes, employee-triggered appeal and override mechanisms, post-launch monitoring of user feedback and adherence to MTN's incident management and crisis management procedures.

### **Stakeholder awareness and engagement**

MTN commits to:

- Fostering a culture of AI awareness through ongoing education and stakeholder engagement.
- Promoting ethical AI literacy across its workforce.
- Engaging regulators, industry partners and communities to co-create responsible digital ecosystems.
- Increasing understanding of AI capabilities, risks and limitations among employees, customers and partners to support informed, fair and transparent AI usage.
- Promoting responsible disclosure practices where AI technologies are used in customer or stakeholder interactions, supporting transparency and trust in automated or AI-enabled engagement channels.

### **Awareness, training and communication**

- MTN directors and employees have access to Responsible AI policies and receive regular communications regarding governance updates, procedures and expectations.
- Employees are educated on responsible AI use, applicable regulations, ethical standards and governance procedures, reinforcing alignment with MTN's values and the Responsible AI framework.



### **Accountability and governance**

- The Board of Directors and the Social, Ethics and Sustainability Committee have oversight of the Group's actions and performance regarding Responsible AI.
- At an operational level, the Executive Committee of each operating company is responsible for ensuring compliance with the MTN Responsible AI Policy and applicable local legislation, rules and standards.
- Accountability for Responsible AI is embedded throughout the AI lifecycle in line with MTN's values, regulatory obligations and governance frameworks.
- MTN commits to the ongoing review and continuous improvement of its Responsible AI approach.