



MTN POSITION STATEMENT

Responsible Marketing

The issue

MTN recognises that our reputation and goodwill are vital assets contributing to the Group's long-term sustainability. Marketing and advertising communications have a direct influence on how MTN is perceived by customers, regulators and wider society. Inappropriate, misleading or irresponsible marketing practices may cause harm to customers or society, undermine trust or expose the organisation to reputational, legal and regulatory risk. MTN therefore recognises the importance of ensuring all marketing activities are conducted responsibly, transparently and in a manner that reflects respect for people, society and human rights.

Linking the issue to our strategy

MTN's belief that everyone deserves the benefits of a modern, connected life underpins our approach to responsible marketing. Customers are at the centre of MTN's business and responsible marketing supports the creation of long-term value, trust and sustainable relationships with customers and stakeholders.

MTN seeks to ensure our marketing activities are aligned with our values, ethical standards and commitment to transparency and that these commitments can be evaluated through consistent conduct across all markets.

MTN's responsible marketing approach is guided by applicable legal, regulatory and governance requirements, including company law, listing requirements, corporate governance principles and advertising and marketing communications standards, which together support ethical, accurate and responsible communication.

Scope

This position statement applies to all marketing, advertising and promotional activities undertaken by MTN Group and our operating companies, across all media and platforms. It applies to MTN directors, officers, employees and representatives, whether permanent, temporary or on contract, as well as agencies, intermediaries, contractors, suppliers and other third parties acting on MTN's behalf in the creation or dissemination of marketing communications.

These commitments align with and support MTN's internal Responsible Marketing Policy and Code of Ethics and Conduct.

Our commitments

Direct operations

MTN commits to:

- Ensuring all marketing and advertising communications are honest, accurate, clear and not misleading.
- Communicating information in a manner that enables customers and stakeholders to make informed decisions.
- Avoiding marketing practices that may cause harm, exploit vulnerable groups or undermine trust.
- Avoiding the use of omissions, ambiguities or exaggerated claims, and making certain that marketing content does not promote or encourage illegal behaviour, violence, discrimination, exclusion or harmful stereotypes.



- Respecting customer rights, including privacy, dignity and freedom of choice, in all marketing activities.
- Portraying individuals as empowered, multi-dimensional participants in society and avoiding objectification or exploitative representation.
- Ensuring marketing content complies with applicable laws, regulations, licence conditions and industry codes in the markets where it is disseminated.
- Avoiding discriminatory, offensive or inappropriate content and respecting cultural and social sensitivities.

Value chain

MTN commits to:

- Requiring employees, agencies, service providers, intermediaries and other third parties – acting on MTN's behalf – to comply with the same responsible marketing standards, applicable laws and advertising codes.
- Ensuring third-party marketing activities involving MTN customers are conducted only within agreed mandates and, where relevant, on the basis of appropriate customer consent, in line with data privacy and protection requirements.
- Taking appropriate action where marketing activities conducted by third parties do not meet MTN's standards.

Accountability

The MTN Board, through the Group Social, Ethics and Sustainability Committee, oversees the Group's actions and performance in relation to responsible marketing. The Group Executive Committee is responsible for implementing the Responsible Marketing Policy and managing related risks, supported by relevant Group functions.

MTN reviews and improves our responsible marketing approach, taking into account regulatory developments, evolving societal expectations and business needs.

Awareness, training and communication

The Responsible Marketing Policy is communicated to employees, operating companies, subsidiaries and relevant partners, and is translated into local languages where required. MTN provides guidance and training to support understanding of responsible marketing requirements and to promote consistent application across markets.