



MTN POSITION STATEMENT

Responsible Mobile Advertising and Sales

The issue

MTN recognises that mobile advertising and sales form part of our value-added services and must be conducted in a responsible manner. Advertising content that is misleading, harmful, offensive, unlawful or inappropriate can expose end-users to harm, undermine trust, damage MTN's reputation and create legal and regulatory risk.

MTN therefore seeks to balance our commercial objectives with our legal, regulatory and ethical obligations to multiple stakeholders, while protecting end-users – including children and other vulnerable groups – from inappropriate advertising content.

Linking the issue to our strategy

MTN's approach to mobile advertising and sales supports our position as a trusted, listed pan-African mobile operator. Responsible advertising contributes to protecting MTN's reputation, maintaining public trust and supporting sustainable business outcomes.

MTN's advertising practices are guided by applicable laws, regulations, codes of conduct and internal governance frameworks, and are intended to support ethical conduct, consumer protection, transparency and compliance across all markets in which MTN operates.

MTN has a Group Responsible Advertising and Marketing Policy in place that provides a governance framework regarding advertising decisions and ensures responsible advertising principles and practices are adhered to.

Scope

This position statement applies to mobile advertising and advertising sales conducted across the MTN Group, including advertising content placed on the MTN network and advertising created or placed by MTN operating companies in relation to MTN's business.

It applies to MTN Group, our operating companies, employees, contractors, advertisers and relevant third parties, and reflects the intent and application of MTN's internal advertising sales policies and guidelines, subject to local law and regulatory requirements.

Our commitments

Direct operations

MTN commits to:

- Making sure advertising complies with all applicable laws and regulations of the relevant country in which the advertisement is viewed or accessed.
- Monitoring that advertisements are suitable for a general audience, taking into account market sensitivities and local social norms.
- Ensuring advertisements are not misleading, deceptive, unfair or discriminatory, and do not abuse the trust or lack of experience of end-users.
- Protecting children and young people by making certain that advertising content does not cause physical, moral or psychological harm.
- Preventing the publication of advertising content that is defamatory, offensive, hateful, obscene, illegal or unethical.
- Ensuring advertising claims are truthful, accurate and capable of substantiation.



Value chain

MTN commits to:

- Compelling advertisers and advertising partners to comply with MTN's advertising content requirements and applicable local laws.
- Taking reasonable measures to ensure advertisers are aware of, and comply with, MTN's advertising guidelines.
- Withholding, restricting or removing advertising content that does not meet MTN's legal, regulatory or ethical standards.
- Guaranteeing that advertising content placed on the MTN network does not promote criminal, anti-social, violent, extremist or discriminatory conduct.

Security and risk management

MTN commits to:

- Ensuring the collection and use of personal data for advertising purposes complies with applicable data protection laws and MTN's data privacy and protection policies.
- Applying appropriate measures to ensure end-users can understand and exercise their rights, including opt-in and opt-out choices where required.
- Taking special care when using targeted advertising to maintain compliance with data protection laws and internal privacy requirements.
- Clearly identifying targeted advertising content and disclosing the types of processes and technologies used for such advertising, where applicable.

Accountability and governance

- MTN's advertising sales activities are governed by approved Group policies and guidelines, supported by internal governance and compliance processes.
- Each MTN operating company remains responsible for compliance with applicable advertising laws, regulations and guidelines in its jurisdiction.
- Breaches of advertising policies and guidelines may result in internal investigation and disciplinary action in line with MTN's disciplinary processes.
- The policy and guidelines are subject to periodic review to maintain relevance, compliance and applicability.

MTN commits to the ongoing review and continuous improvement of our responsible mobile advertising and sales practices in response to regulatory developments, business needs and stakeholder expectations.

Awareness, communication and training

- Advertising policies and guidelines are communicated to relevant internal stakeholders and made available to advertisers in summarised form where appropriate.
- Approved updates to advertising guidelines are communicated using applicable internal and external channels.