



Doing for tomorrow, today

MTN Group Limited

Transparency Report for the year
ended 31 December 2021

MTN

Contents

ABOUT THIS REPORT

- 01 Scope and boundaries
- 01 Reporting standards and guidelines
- 01 Data collection process
- 02 Who we are and where we are going
- 03 Where we operate and how we performed

INTRODUCTION

- 04 Our operating context
- 05–07 Material digital human rights matters in our operating environments
- 08 Trade-offs to be managed in protecting digital human rights
- 09 MTN digital human rights strategic framework

MTN DIGITAL HUMAN RIGHTS POLICY

- 10–12 Key principles of MTN's digital human rights policy
- 13 Case study – South Sudan

STRENGTHENING MTN'S DIGITAL HUMAN RIGHTS DUE DILIGENCE

- 14 Rights and incident management
- 14–16 Digital human rights due diligence framework
- 17 Roles, responsibilities and governance framework
- 18 Impact management
- 19 Case study – eSwatini

REDEFINING DIGITAL HUMAN RIGHTS GOVERNANCE STRUCTURE

- 20–21 Responsible advocacy

DEFINING A HUMAN RIGHTS ADVOCACY APPROACH

- 22 Disclosure and performance management
- 23 Case study – Zambia

MARKETS REPORT

- 24 Categories of requests from authorities and NGOs
- 25 Overview of trends in transparency reporting
- 26 Afghanistan
- 27–28 Benin
- 29 Cameroon
- 30 Congo – Brazzaville
- 31 Côte d'Ivoire
- 32 eSwatini
- 33 Ghana
- 34 Guinea-Bissau
- 35 Guinea-Conakry
- 36 Liberia
- 37 Nigeria
- 38–39 Rwanda
- 40 South Africa
- 41 South Sudan
- 42 Sudan
- 43 Uganda
- 44 Zambia

Our Purpose

is to enable the benefits of a modern connected life for everyone



Navigating this report

Throughout our Transparency Report, the following icons are used to show the connectivity between our **Ambition 2025** strategic priorities, our capitals, our material matters and value creation for our stakeholders.

Our material stakeholders:

- MTNers
- Subscribers/customers
- Investment community
- Civil society
- Government and regulators

Our capitals:

- Natural capital
- Financial capital
- Intellectual capital
- Human capital
- Manufactured capital
- Social capital

Material matters:

- MM 1** COVID-19 impact
- MM 2** Challenging economic environment
- MM 3** Dynamic geopolitical environment
- MM 4** Evolving regulatory and compliance requirements
- MM 5** Disruptive technologies
- MM 6** Balance sheet resilience
- MM 7** Greater focus on ESG
- MM 8** Cybersecurity
- MM 9** Fintech and digital skills and expertise

Other icons:

- ESG at the core
- Limited assurance obtained
- www.mtn.com

2025 strategic priorities:

- Build the largest and most valuable platforms
- Drive industry-leading connectivity operations
- Create shared value
- Accelerate portfolio transformation

In the year we took a step change in our **approach to ESG**, placing it **at the core** of our strategy. This aligns with our work to advance the United Nations Sustainable Development Goals through our business activities and our support of governments, communities and customers. The SDGs target a sustainable society with a plan to end poverty, protect the planet and ensure equality for all by 2030. We are committed to bridging the digital divide, furthering financial inclusion to advance the attainment of the goals. **For details of how we determine the SDGs on which we have the greatest impact, see page 45.**

MTN focus

- 5 GENDER EQUALITY
- 8 DECENT WORK AND ECONOMIC GROWTH
- 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
- 10 REDUCED INEQUALITIES
- 13 CLIMATE ACTION
- 16 PEACE, JUSTICE AND STRONG INSTITUTIONS
- 17 PARTNERSHIPS FOR THE GOALS

Indirect impact

- 1 NO POVERTY
- 2 ZERO HUNGER
- 3 GOOD HEALTH AND WELL-BEING
- 4 QUALITY EDUCATION
- 6 CLEAN WATER AND SANITATION
- 7 AFFORDABLE AND CLEAN ENERGY
- 11 SUSTAINABLE CITIES AND COMMUNITIES
- 12 RESPONSIBLE CONSUMPTION AND PRODUCTION
- 15 LIFE ON LAND

Our reporting suite

These reports are available on or on request from Group Investor Relations – investor.relations@mtn.com.

AFS	TAX	KIV	5Y	SR	IR	GRI	CDP
Annual Financial Statements	Tax Report	King IV™ Report	Five-Year Review	Sustainability Report	Integrated Report	GRI Report	CDP Report
Detailed statements, analysis of the Group's financial results and the full Audit Committee report.	MTN's approach to tax and dealing with uncertain tax positions; views on specific tax risks; and our total tax contribution.	MTN's application of the King IV™ principles.	Comprehensive view over five years of the income statement; statements of financial position and cash flows; performance per share; as well as key non-financial information.	MTN's detailed environmental, social and governance performance.	Our primary communication to stakeholders, aiming to enable them to make an informed assessment of our performance and prospects and the value we create through our activities.	Structured disclosure on the impacts of the Group's activities.	Global environmental disclosure, reporting on risks and opportunities in climate change, water security and deforestation

About this report



This report aims to provide insight into how MTN approaches governance of digital human rights, privacy and freedom of expression.

In addition, it also provides an overview of our human rights commitments and policies, which inform our human rights framework and the processes we follow when responding to requests from governments and non-governmental entities.

Lastly it details the legal regime, authorities empowered under local legislation and requests we received last year in each of the countries we operate in, unless the country's legislation prohibits us from doing so.



Scope and boundaries

Timeframe

This report covers the period commencing 1 January 2021 and ending 31 December 2021. Where possible, data for the period 1 January 2020 to 31 December 2020, is also provided.

Markets covered

This report covers our operating companies within the following markets:

- Afghanistan, Benin, Cameroon, Congo-Brazzaville, Côte d'Ivoire, eSwatini, Ghana, Guinea-Bissau, Guinea-Conakry, Liberia, Nigeria, Rwanda, South Africa, South Sudan, Sudan, Uganda, and Zambia (collectively, the 'markets').
- MTN Yemen and MTN Syria were excluded from 2021 reporting due to data collection challenges and MTN's phased exit from the Middle East. Botswana and Iran are not included in this report due to MTN having majority indirect and minority ownership holding, respectively.

Due to legal restrictions in some countries in which we have a presence, certain markets are prevented from publicly disclosing certain information. Where this is the case, we have omitted this information from the report given the rule of law. In addition, there are instances where we do not detail the number of requests received from non-governmental entities for reasons of requests not being received by the markets in question.

Reporting standards and guidelines

The frameworks used to guide the report content and presentation

The reporting principles followed in the compilation of this report are aligned with the Global Reporting Initiative and the Integrated Reporting Framework. The report content has been informed by the disclosure requirements of the Ranking Digital Rights Index, the Global Network Initiative (GNI), and the GSMA Human Rights Guidance for the Mobile Industry. Also, this report seeks to meet the expectations for transparency set out by the United Nations Global Compact (UNGC) and United Nations Guiding Principles on Business and Human Rights.

Data collection process

How the data for the report was collected

This report was compiled using information collected by MTN Group from each of the markets, with the assistance of Webber Wentzel to safeguard the integrity of the information.

In preparing this report, MTN relied on its internal policies and relevant documents as well as the policies, legislation and regulations of the specific markets. In select markets, data request numbers from the previous reporting cycles have been revised due to the maturing data verification processes. The MTN markets provided detailed and updated information, where there were legal updates concerning:

- The laws applicable to their market and how these laws protect the digital human rights of the market's subscribers.
- Where a law does not have a descriptive name in a country, we have included a one-line description of that law in the report.
- The regulators, authorities, courts and/or state bodies in each territory that exercise jurisdiction over the market (each an 'authority').
- The requests received by the markets from the authorities and the way the markets have responded to these requests (in particular, whether the markets have complied with, partially complied with, or denied requests).
- The requests received by the markets from private individuals, private companies, or attorneys or third parties authorised on their behalf (each a 'non-government entity') and how the markets have responded to these requests.

The legal framework and authorities referred to in each market are accurate as at 31 December 2021.

Feedback

We welcome feedback on this report and are committed to listening to our stakeholders about our sustainability and human rights efforts. Please address all feedback to Group Sustainability: humanrights@mtn.com.



Who we are and where we are going

Our Purpose is to enable the benefits of a modern connected life for everyone

MTN is a pan-African mobile operator with the strategic intent of *'Leading digital solutions for Africa's progress'*. Inspired by our belief that everyone deserves the benefits of a modern connected life, we provide a diverse range of voice, data, digital, fintech, wholesale, enterprise and API services to more than 272 million customers in 19 markets.

We were established in South Africa at the dawn of democracy in 1994 as a leader in transformation. Since then, we have grown by investing in sophisticated communication infrastructure, developing new technologies and by harnessing the talent of our diverse people to now offer services to communities across Africa and the Middle East.

MTN Group Limited is a publicly owned entity creating shares traded on the JSE. At the end of 2021 our market capitalisation was R321.7 billion (US\$20 billion).

How we define value

For us, value is progress in achieving our strategic intent and delivering on our purpose to enable the benefits of a modern connected life for everyone in our footprint.

Guided by our

Strategic intent
Ambition 2025
 'Leading digital solutions for Africa's progress'

And delivering on our

2025
 Strategic priorities

- Build the largest and most valuable platforms
- Drive industry-leading connectivity operations
- Create shared value
- Accelerate portfolio transformation

We are creating

the MTN of tomorrow:

- Purposeful
- Inclusive and diverse
- Innovative
- Agile
- Resilient
- Partner to nation states

With ESG at the core

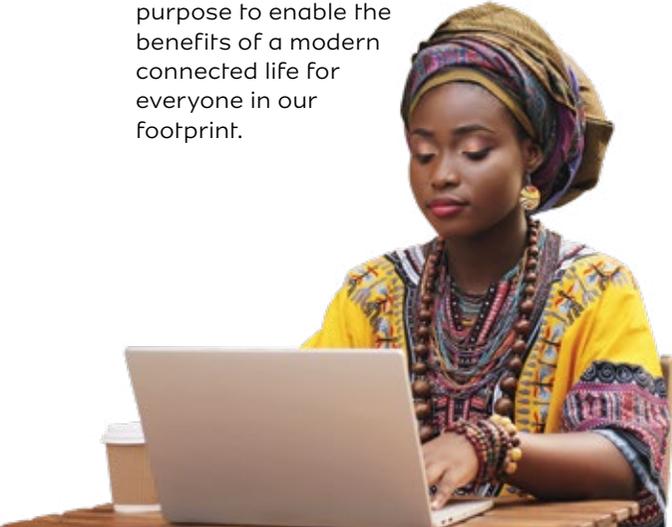


Creating value for all

272m subscribers	122m active data users
57m active MoMo users	11m active ayoba users
R172bn in service revenue	16 390 skilled MTNers [^]
Africa's largest fixed and mobile network: invested capex of R32.7bn	
Economic value of ~R115bn added across our markets	Reduction of ~16% in GHG emissions (targeting 47% reduction by 2030 and Net Zero by 2040)
Rural broadband coverage ~83% (targeting 95% by 2025)	Women are 39% of our workforce (targeting 50% by 2030)

[^]After exiting MTN Syria and MTN Yemen in the year

Doing for tomorrow, today.



Where we operate and how we performed



Our geographic footprint is wide, stretching over **19** markets on two continents, therefore robust operational oversight is critical. We secure this through a management structure that reflects almost equal contributions of around a third to Group earnings of each of our operations in South Africa and Nigeria and that of our regions – SEA, WECA and MENA – combined.

Changes in our portfolio

Our asset realisation programme

Our ARP was launched in 2019 with an aim to realise assets that were viewed as not long-term strategic assets. In February, we completed the sale of our 20% shareholding in BICS. In October, IHS Towers listed and started trading on the New York Stock Exchange. We will look to sell our 26% interest when market conditions are conducive.

Another important element of our ARP is broadening local participation. We listed by introduction in Rwanda. We also listed in Uganda, selling down ~13% of our shareholding and in Nigeria we sold down a further ~3% of our shareholding.

Portfolio transformation

In 2020, we announced our intention to exit the Middle East operations over the medium term in line with our pan-Africa focus and to simplify our portfolio and reduce risk.

In August 2021, we exited Syria. Given regulatory actions and demands that made operating there untenable, we abandoned the operation. We also exited our operation in Yemen through a transfer of our shareholding. This brought the number of MTN operations to 19 from 21. We continue to explore options to exit Afghanistan in an orderly manner.

Our portfolio at 1 April 2022

(MTN Group ownership)

MTN South Africa 100.0%

MTN Nigeria ▲ 75.6%

SEA

MTN Uganda ▲ 83.1%

MTN Rwanda ▲ 80.0%

MTN Zambia ▲ 89.8%

MTN South Sudan 100.0%

Mascom Botswana ▲ 53.3%

MTN eSwatini ▲ 30.0%

WECA

MTN Ghana ▲ 85.5%

MTN Cameroon 80.0%

MTN Côte d'Ivoire 66.8%

MTN Benin 75.0%

MTN Guinea-Conakry 75.0%

MTN Congo-Brazzaville 100.0%

LonestarCell (MTN Liberia) 60.0%

MTN Guinea-Bissau 100.0%

MENA

MTN Sudan 85.0%

MTN Afghanistan ■ 100.0%

MTN IranCell ■ ▲ 49.0%

Associates, JVs and other investments

aYo 100.0%

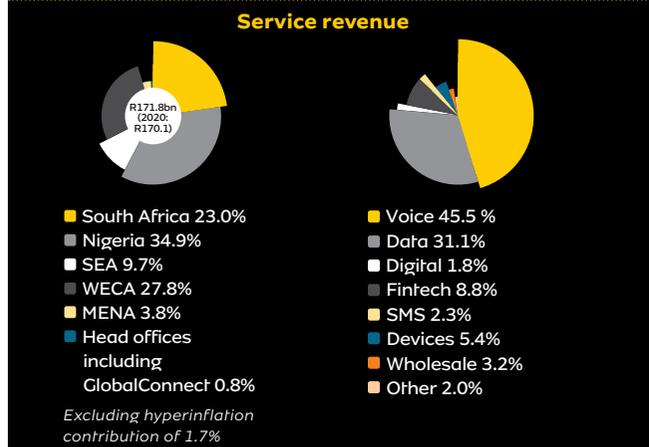
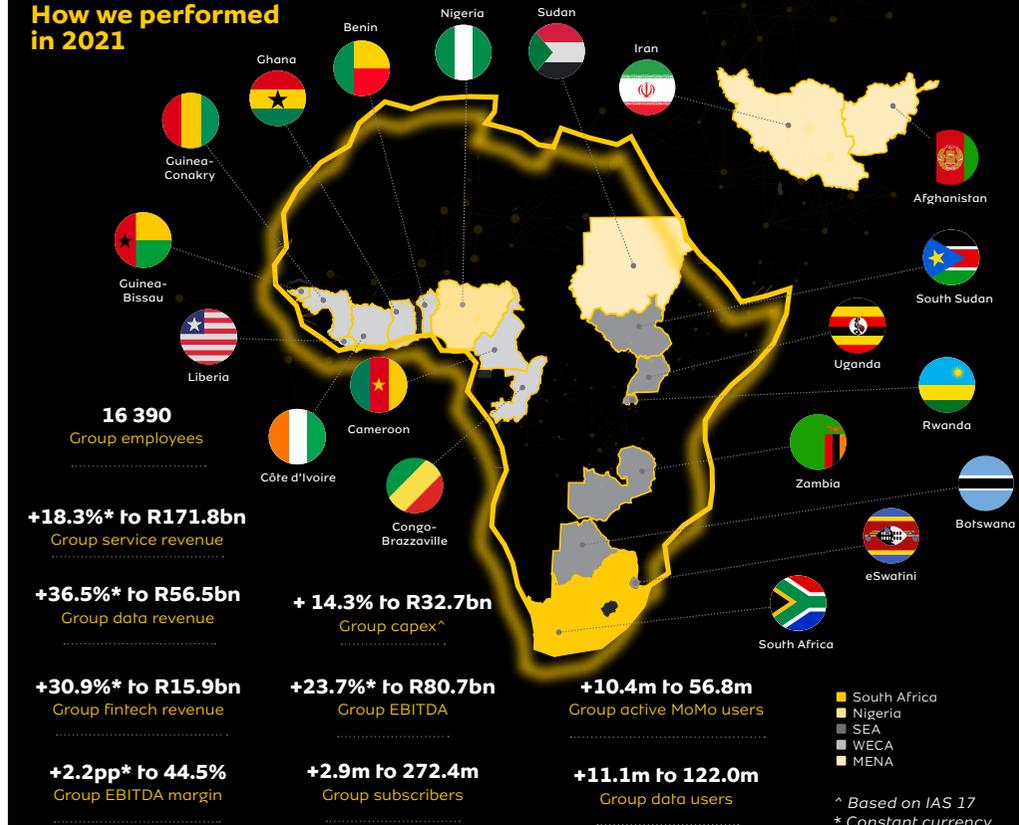
IHS Group* 25.9%

Iran Internet Group* ▲ 29.5%

Middle East Internet Holding* ▲ 50.0%

▲ Localisations
 * Not long-term strategic assets
 ■ Exiting in an orderly manner over the medium term
 ▲ Equity accounted

How we performed in 2021



Introduction



The United Nations Human Rights Committee has stated that “Freedom of opinion and freedom of expression are indispensable conditions for the full development of the person. They are essential for any society. They constitute the foundation stone for every free and democratic society and the freedoms of opinion and expression form a basis for the full enjoyment of a wide range of other human rights”.

As part of our suite of communications with stakeholders, one of the ways we share with our stakeholders issues that may affect their ability to enjoy these rights is through our transparency reports. Building trust through

transparency, these reports provide insight and context to the complex issues, and legal frameworks affecting and impacting digital human rights. For customers who use or are considering using our services, these reports provide a good sense of how we support and uphold human rights across our mobile and internet services and platforms.

When digital technologies are disrupted, the rights enabled by these technologies may become vulnerable to exploitation and abuse, through cybercrime, misinformation, disinformation and online abuse.



Our operating context

We operate in a rapidly changing environment. From our customer profiles and stakeholder concerns, to the way people use and interact with communications technology, to the laws and regulations that govern how communications infrastructure may be used, across our multiple countries of operation.

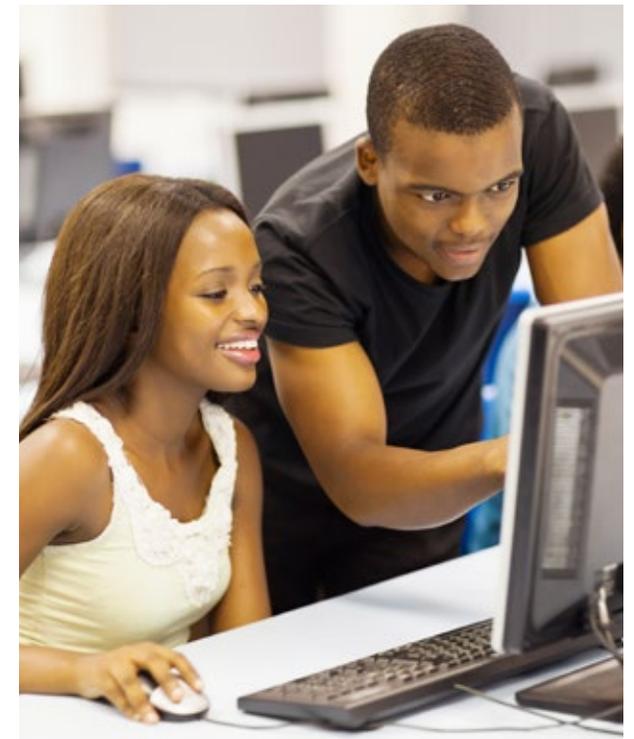
It is all moving very rapidly. According to the GSMA, “By the end of 2020, 51% of the world’s population were using mobile internet, an increase of 225 million since the end of 2019”. However, in sub-Saharan Africa, that figure is only 28%. In addition, although progress has been made in reducing the percentage of areas without mobile broadband network coverage to just under 20%, we still have a usage gap of 53%.



We have seen the power of communications technology to change, improve and save lives, from the individual level to country-level, and even global level. As communications technology has become more intertwined in daily life, we have also seen the major disturbances that happen when access to communications is disrupted.

As a pan-African market operator, the environment in which we work is complex, presenting unique challenges as well as exciting and valuable opportunities. Many of the markets in which MTN operates are dealing with several challenges to increasing access and usage of the internet and mobile broadband, recognising the link between internet connectivity and country development. However, they also possess great potential, with some markets experiencing sustained economic growth, internet connectivity and improvements in human development indices.

MTN’s presence enables people to realise a range of basic human rights, such as the rights to freedom of expression and association. We achieve this through the provision of communications services, while striving to identify, prevent, mitigate, and account for adverse human rights impacts that may arise while contributing positively to the advancement of the societies in which we operate.



Material digital human rights matters in our operating environments



Our digital and physical environments are rapidly changing, and there are factors in our operating environments that impact our stakeholders and us. These range from social and political spheres and issues such as the use of personal data, to the environmental sphere where the environmental impacts of goods and services must be addressed.

They all have impacts on our financial performance, and our business strategies. These topics are also changing in importance quite rapidly, and inter-related at times, increasing their impact. We keep close watch on our environment through both our own efforts and our engagements with our stakeholders, who provide input into our approach.

Trends, issues and considerations concerning digital human rights

Internet as a human right

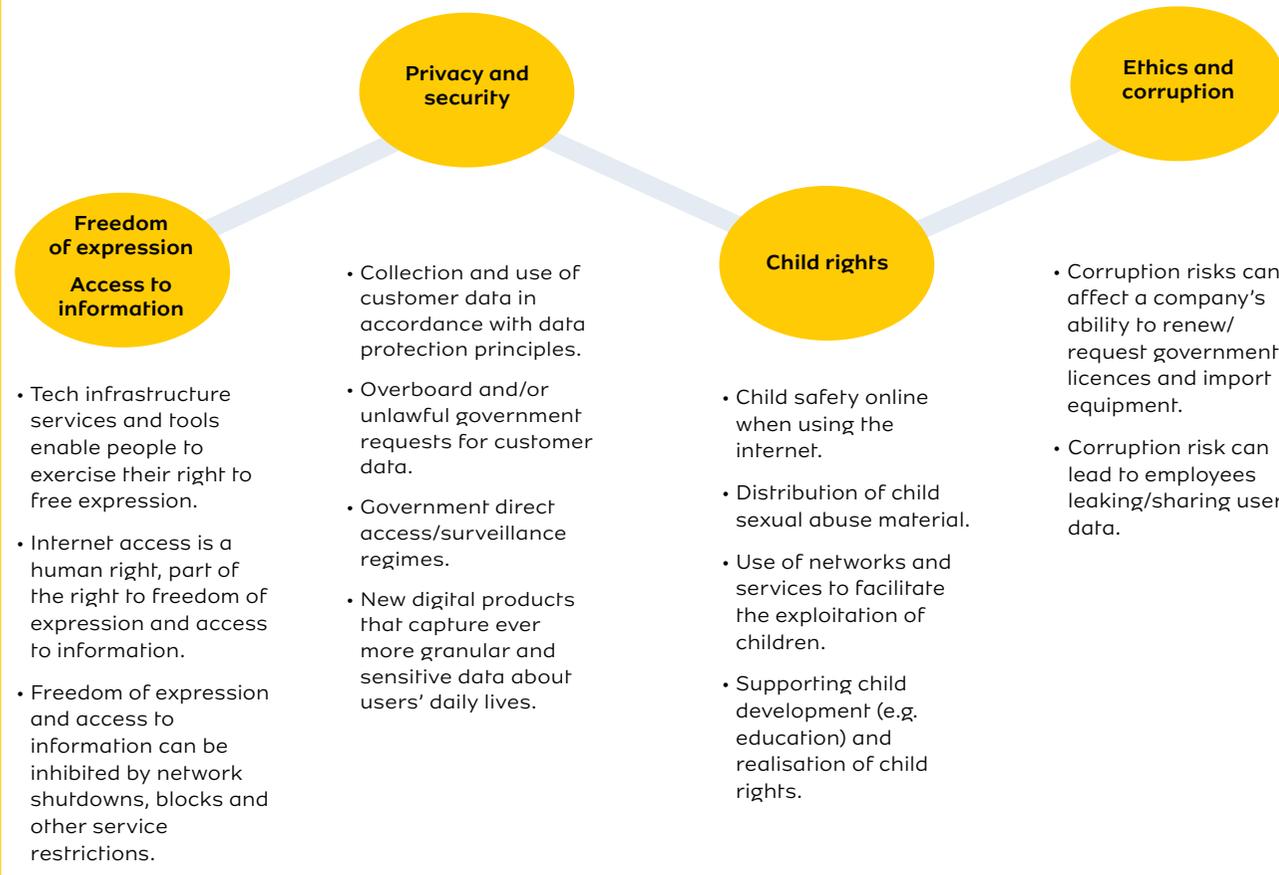
In 2016, the United Nations Human Rights Council released a non-binding resolution condemning intentional disruption of internet access by governments. The resolution also reaffirmed that the same rights people have offline must also be protected online. One of the United Nations Sustainable Development Goals (UN SDGs), SDG9c, aims to 'significantly increase access to ICT and strive to provide universal and affordable access to the internet in least developed countries by 2020'. This SDG target also has positive impacts on a range of other SDGs. Increasingly, internet access is essential to accessing education and economic opportunities and achieving several other development objectives.



Digital human rights as an enabler of other rights

Internet access directly supports the right to freedom of speech and expression. Indirectly, it supports several other human rights, such as political rights associated with freedom of assembly, the right to non-discrimination, and the right to participate in political processes. Rights associated with human development, such as the right to education and health can be positively impacted by internet access, as it is widely evidenced during the past two years, where the important information about the COVID-19 pandemic has been shared with people across the globe and has contributed to flattening the curve of the virus, enabling social contact and economic transformation.

Common human rights impact of telecommunications companies as highlighted by BSR



Material digital human rights matters in our operating environments

continued



Vulnerability of digital rights

When protected digital human rights enable development, however, they are also vulnerable when disrupted. Digitalisation may facilitate participation in electoral affairs but carries risks of manipulation, interference and enabling violation of other rights. Similarly, the internet can facilitate innovative healthcare practices but also carries risks and vulnerabilities associated with mis and disinformation.

Internet shutdowns, which have been on the rise, have widely been condemned as a human rights violation. While there are a range of reasons offered for the need to restrict internet access, the timing of these disruptions to internet access, which often coincide with periods of social unrest, elections and risks to national security. In addition, many stakeholders in society are becoming increasingly more vocal on human rights issues, including digital human rights, resulting in greater demonstrations, mainly led by our continent's large youth population. State security forces often struggle to contain these protests especially as they become widespread and may turn to limiting spread of information, possible violence and public disorder.

Data privacy

There has been increasing concern about data privacy, owing to increasing incidences of cybercrime across the world. This concern only grew as more people moved to working remotely because of the COVID-19 pandemic. Business concerns around data security, amplified individual concerns and awareness about the security of their own data. Stakeholders are increasingly aware of how valuable their personal information is and are asking more questions about how data is used by companies. In conjunction with business and individual concerns about data privacy, governments and regulators have, in many regions, launched new data privacy standards for companies and the public sector to comply with.

Connected with the right to access the internet and express oneself, is the right to remain private. The increasing levels of digital surveillance can have negative impacts on privacy rights. Also, the results of data collection can lead to profiling of users, which can sometimes result in discrimination, based on characteristics such as gender, ethnicity and sexual orientation, even if unintentional. Transparency around how businesses process and sharing of personal data now plays a critical role in any customer-company relationship.

Increase in mis- and disinformation

In recent years, we have noted that as the internet and social media platforms gain prominence as sources of information and so increases the dangers of misinformation and disinformation. We have seen the impact of this in terms of misleading information around COVID-19 vaccines. In such times, digital literacy, responsible AI and marketing become of critical importance in protecting individuals and communities.

Conflict-affected areas

For companies operating in conflict-affected and high-risk areas, the likelihood and severity of human rights violations is amplified owing to the presence of conflict. Companies can cause, contribute or be linked to conflict at any point in their value chain and most often without even knowing it by operating in such a market. This tends to impact both private and public sector alike. The interaction of products and services with conflict drivers can result in severe human rights impacts. Private sector investment is critical to peace, poverty alleviation, and the achievement of the UN SDGs.

Contrasting domestic versus international law

In certain instances where a country's domestic law conflicts with international law, there is little recourse for a company to abide by the international law at the expense of the domestic law, when the coercive force for implementing the law is found only at national level.

Sometimes, no enabling law is cited in support of an order to shut down the internet and in other cases, there is an array of domestic laws offered in justification of a shutdown order. They range from national security laws, telecommunications laws and the laws of contract which govern licence agreements that grant governments the power to make orders to this effect.

Some of these laws are ambiguous, drafted before the socio and economic dependence on technology and what would be the ripple effects of the digital age. Notwithstanding the flaws in these domestic laws and their apparent incompatibility with international human rights laws, shutdown orders typically give their subjects little time or room to move to challenge the order before a higher authority. These typical trends in these laws place a burden on the subjects in determining the legality of the contents of the directives.



Material digital human rights matters in our operating environments continued



Challenges in transparency reporting

The laws that govern information and data security vary between countries and regions, including the interpretation from regulators. This makes ensuring alignment and harmonisation of our policies difficult. In addition, it makes presenting a comprehensive and consistent picture of transparency issues a difficult dilemma.

There are no definitive standard metrics for transparency and digital rights reporting. Even the frameworks that currently exist are in a constant state of evolution. However, we focus on a set of widely used international

indicators that support comparability and consistency, and we use our transparency report and other platforms to convey to our stakeholders how we are trying to address these challenges.

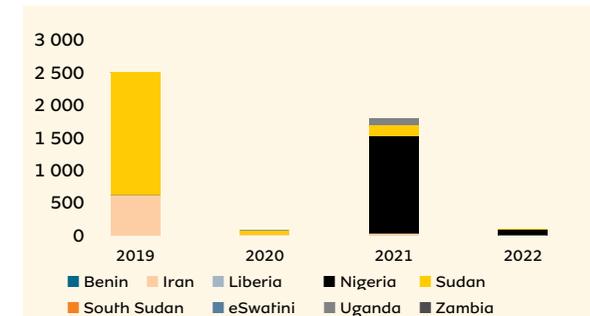
In addition to our own challenges, we also find that as telecommunications companies, we do not always have the same interpretation of country laws. This can lead to situations where one company might not list a law as being relevant, while another does. This can occur, even with the use of external legal advice on applicability.

Internet shutdowns

According to the latest Top10 VPN report, government internet shutdowns have cost \$19.6 billion, over 30.179 hours, since 2019. Shutdowns in locations where MTN operates account for just under 20% of this cost on average. These shutdowns are also associated with increased incidences of human rights incidents, restrictions on freedom of assembly, election interference, and freedom of the press.

Shutdowns happen for a variety of reasons; however, the most impactful shutdowns relate issues of social unrest, risks to national security, elections and military coups which may lead to access restrictions.

Cost of internet shutdowns indicated by Top10 VPN (US\$ billion)



Trade-offs to be managed in protecting digital human rights



Operating in challenging markets

We see significant potential in our markets to offer vital communication services despite some of the inherent risks. Such risks are factors of doing business in these markets and are not limited to MTN. We are continuously evolving and innovating our framework and the way we conduct our business. We also transfer lessons from one market to another on an ongoing basis. It is important to remember that in countries where there are many internet service providers, restricting access to the internet is much more challenging than in countries with few providers. Often, we are one of only a few service providers in a country, providing much-needed communication platforms.

The need for data versus the cost of protecting data

Access to customer data is key to delivering and enhancing our service provision. We have a responsibility to protect this data we have been entrusted with. However, as the value of data increases, so do the attempts to access this data unlawfully, and the resources needed to keep this

data safe grows. We must balance our accumulation of data with the costs of keeping it safe. This problem is made more difficult by operating in multiple countries, as not every country has the same legislation and infrastructure to provide the same level of protection. In addition, data protection laws may also mean we cannot transfer this data across borders to locations where it may be safer. Our policy for data protection, in line with best practices, sets a minimum standard with which all our operations must comply. To provide our customers with the most effective products and services, we do collect personal information, and use it in several ways, explained in our human rights-related policies, processes and publications section.

Protection of the individual privacy versus protection of everybody's safety

While many people view government requests for information as an invasion of privacy, it is important to note there are several reasons for government to be able to access data relating to citizens, most of which relate to keeping all their citizens safe. As a responsible corporate citizen, we need to balance the justifiable and earnest

attempts by government to keep citizens safe against possible misuse of user data. This is extremely difficult to do, as in most cases, the full extent and reasons behind requests for information are often noted as matters of national security.

Protection of freedom of expression versus preventing harm caused by online abuse, and discrimination

Freedom of expression is a right that needs to be balanced against the harm that can be done through that very freedom. In striving to ensure we protect individual freedoms, such as the right to freedom of expression, we also must ensure that freedom does not infringe on other individuals' rights, such as privacy, dignity and non-discrimination. We also need to ensure the rights of the one do not infringe upon the rights of the many, and in particular, the vulnerable. Our principles and values as a company guide us in where to draw lines of principle in limiting individuals' rights, as we seek to ensure our customers and children remain protected from the very real threats that exist from abuse of internet platforms.



MTN digital human rights strategic framework



Establishing a programmatic approach to human rights

Digital human rights issues extend beyond requests by government for user data. They affect us in myriad ways, across our business and platforms.

Our goal is to bring the various human rights issues under one roof. Our programmatic approach to human rights, revised in 2021, enables a Group-wide approach and responsibility for human rights, while improving opportunities for building and leveraging strengths across the Group.

Rights and incident management

Our focus is to ensure we are proactive in addressing and responding to human rights incidents. We are formalising processes across the Group, as well as preparing for future scenarios that may come to pass and ensuring our decision-making is consistent.

Impact management

Our focus on upholding human rights entails ensuring we do not unduly negatively impact on human rights. We are working to refine our assessment of our human rights impact and responses.

Assessing actual and potential human rights impacts is a key part of the UNGPs requirements.

Responsible advocacy

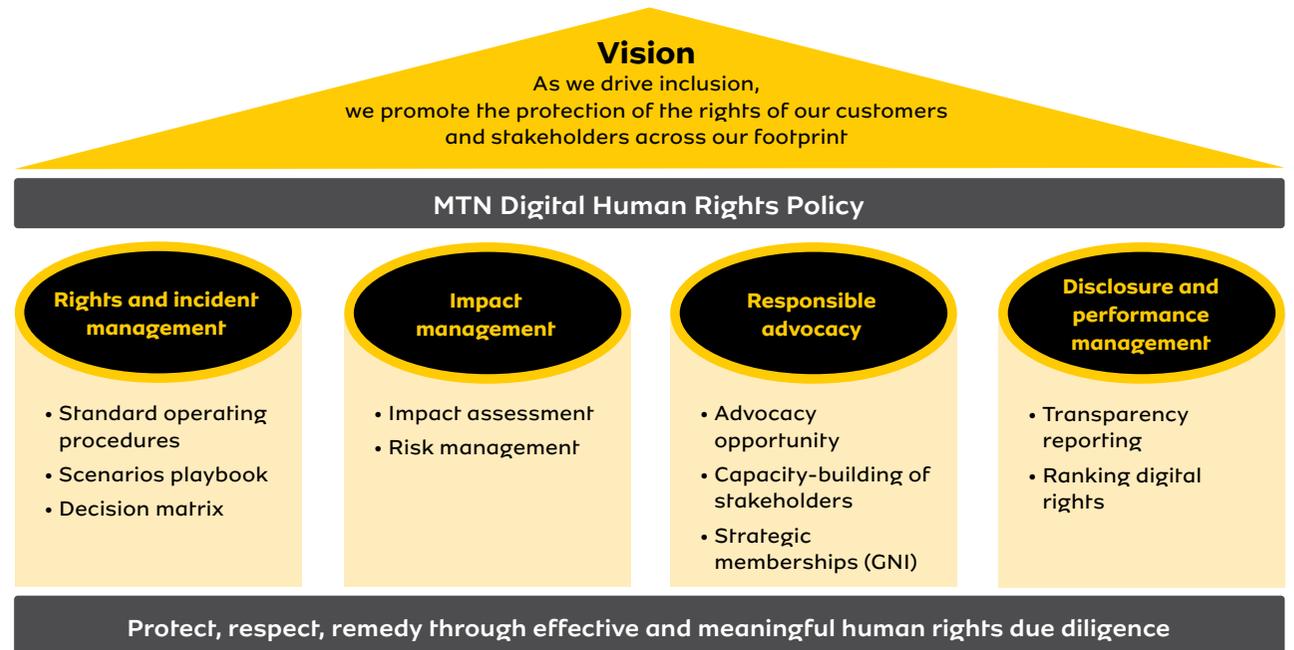
We hold a position of trust in our communities and among our stakeholders. We need to ensure that in all our activities, we remain in line with our values, that we are committed to transparent processes and credible communications, to ensure genuine stakeholder engagement. Our adherence to best practices, across all our reporting and communication platforms, is central to our achievement in this regard. Additionally, we are in good stead to embrace opportunities for multi-stakeholder engagement and consultation when laws impacting digital human rights are in construct.

Disclosure and performance management

We monitor and publicly report our performance in terms of digital human rights, allowing for comparison and assessment of our performance. We use the feedback on our performance to further improve our policies, procedures and practices.



Overview of MTN's digital human rights strategy



MTN Digital Human Rights Policy



MTN's DHR Journey

Our focus on digital human rights began almost a decade ago when we signed up to the UN Global Compact. Since then, we have taken numerous strides forward in advancing our understanding of human rights impacts, and responding with improvements in human rights governance, through the adoption and implementation of policies, procedures and systems focused on protecting and upholding human rights across the MTN Group.

Our human rights policy articulates our public commitment to respecting human rights and guides the processes for translating and embedding that commitment in all our actions. We are deeply committed to respecting digital human rights. Our freedom of expression, data privacy and protection, information security and treating customers fairly rights (TCF) principles are an integral part of our Digital Human Rights Policy and due diligence framework.

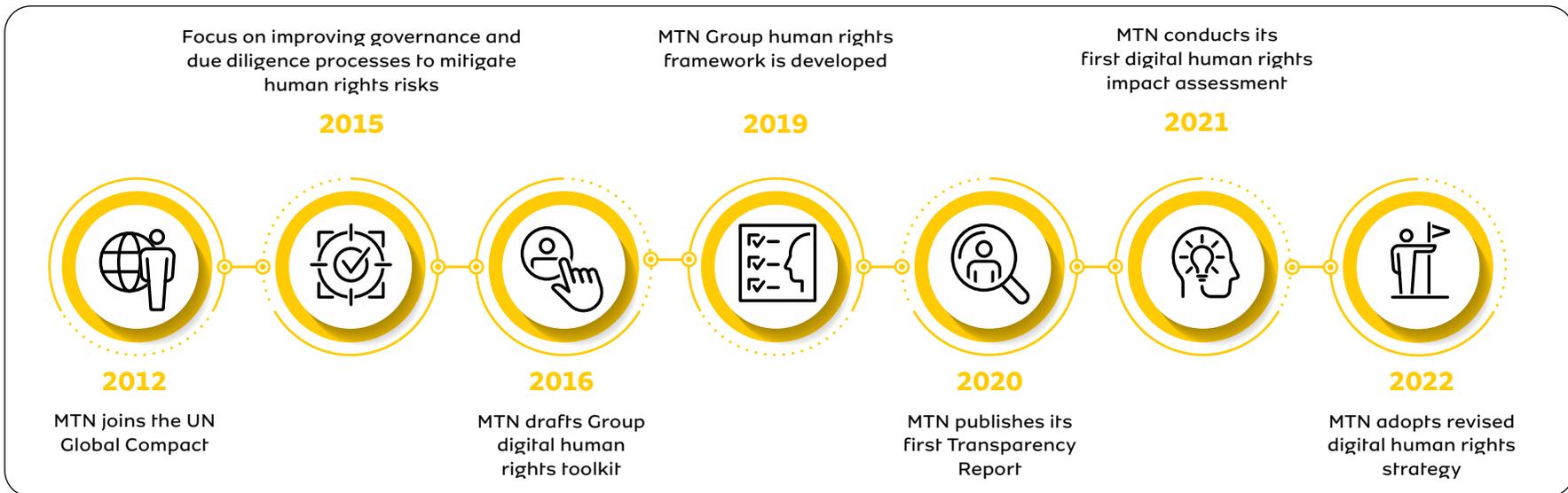
Our response to digital human rights is underpinned by a sound policy and due diligence framework. Our approach is consistent with internationally recognised principles while ensuring MTN remains compliant with the terms of our various jurisdictional legal obligations and licence conditions.

Our Digital Human Rights Policy applies to all our directors, officers, employees and representatives of the Company, whether permanent, temporary or on contract.

We expect our intermediaries, agents, contractors, suppliers and business partners to uphold the same standards. Our Supplier Code of Conduct outlines the minimum standards, including human rights, that each supplier of products or services must comply with.

Across various human rights issues, we ensure we remain abreast of new developments, review lessons learnt and continue to update our processes and policies to align with evolving international standards. In addition, we provide detailed training to staff and partners based on the extent of their roles and ability to impact and/or influence these rights.

The policy is applied at Group level but is customised at company level to align with country specific conditions.



Key principles of MTN's Digital Human Rights Policy



- MTN respects the rights of all persons and opposes any actions that undermine people's human rights and that discriminates against people or may be contrary to our values and beliefs.



- We respect people's rights irrespective of race, ethnicity, colour, age, language, religion, gender, sexual orientation, political or other affiliation, ability, jurisdictional or international status.



- We believe in the rights of all people using digital communications to freely communicate and share information and opinions, and to enjoy the right to privacy and information security without interference.



- We respect and endeavour to comply with the laws of the countries in which we operate.



- We strive to create platforms to enable stakeholders to discuss their concerns with us and to escalate their concerns where they believe their rights have been infringed.



- We value the trust our customers place in us when they provide personal information. We endeavour to stipulate the data we capture, retain, process, use and provide to key stakeholders.



- We work to limit the scope extent or duration of human rights impacts, in instances where we do not have direct control, by engaging with third parties, internet service providers, regulators or other stakeholders who may have control of and/or access to our facilities, infrastructure or services.



- We may restrict access to services, where MTN owns, operates or has technical control over online platforms, in instances where potential exists to harm the rights of people. Restrictions would be applied after assessing if the content is illegal or harmful as defined in terms of prevailing national laws or the UN Universal Declaration of Human Rights.



- MTN seeks solutions to reduce digital human rights risks and adverse impacts through stakeholder collaboration and engagement.



Key principles of MTN's Digital Human Rights Policy continued



Managing customers' privacy rights

- The Data Privacy and Protection Policy, approved in 2020, informs customers of their rights and sets MTN's standard to protect personal information of customers and frames the Group's collection, use and protection of user's information. The policy considers data privacy/data protection developments and regulations in MTN's markets and globally.

Enhancing information security

- The Group Information Security Policy was last updated in 2021. The policy sets out requirements for securing the Group's information, systems and people, using a formal information security management system. The system is based on leading global practice including ISO/IEC 27001:2013, Centre for Internet Security controls and the National Institute of Standards cybersecurity framework.

Empowering customers through fair treatment

- MTN implemented a Group-wide framework on TCF to facilitate transparency and customer control. The framework serves to enable customers to remain aware of the costs they incur, the services they use and how to control and remove access to these services.

Protecting children online

- MTN is committed to ensuring the safety of children online. In 2020, we deepened our commitment by launching the child online protection programme, prioritising our focus on child sexual abuse material (CSAM). We formalised our commitment by becoming members of the Internet Watch Foundation. We have thereby extended our ability to fight against the use of our networks to share CSAM.



Case study – South Sudan

Doing it right



MTN is committed to protecting its customers' privacy, keeping information safe and ensuring the security of personal information. MTN stands by the UN's Guiding Principles on business and human rights, which encourages sound governance and supports the lawful assessment of government directives.

In August 2021, MTN South Sudan successfully lived by this principle and protected the privacy and safety of our customers by implementing MTN's digital human rights policy and due diligence approach when it received a directive for customer data.

MTN respects the laws and regulations of the countries where we operate and acknowledge that our actions may draw mixed reaction amongst the different categories of our stakeholders.



Rights and incident management



Digital Human Rights Due Diligence Framework

The objectives of our digital human rights framework are:

1. Provide MTN with a common vision for how it will respect and promote Human Rights going forward guided by MTN's core belief.
2. Enable MTN to continually improve its Human Rights approach, policies and systems.
3. Allow for integration of MTN's Digital Human Rights strategic responses.
4. Enable MTN to 'operationalise' Human Rights consistently across the business.
5. Systematically entrench Digital Human Rights into the organisation via programmatic approach.

Digital human rights framework

MTN's due diligence framework has been drawn from the UN Guiding Principles for Business and Human Rights (UNGPs) framework.

The framework outlines the steps that all MTN operations would follow before, during and after the occurrence of a digital human rights incident.

Incidents would come in the form of a request or instance where an authority or non-governmental entity approaches MTN on a matter related to freedom of expression, data privacy and information security.

This framework includes assessing potential incidents and potential impacts of the incidents that may affect customers' rights. This enables our teams to respond to incidents through a clearly defined process that includes identifying remedies for affected customers.

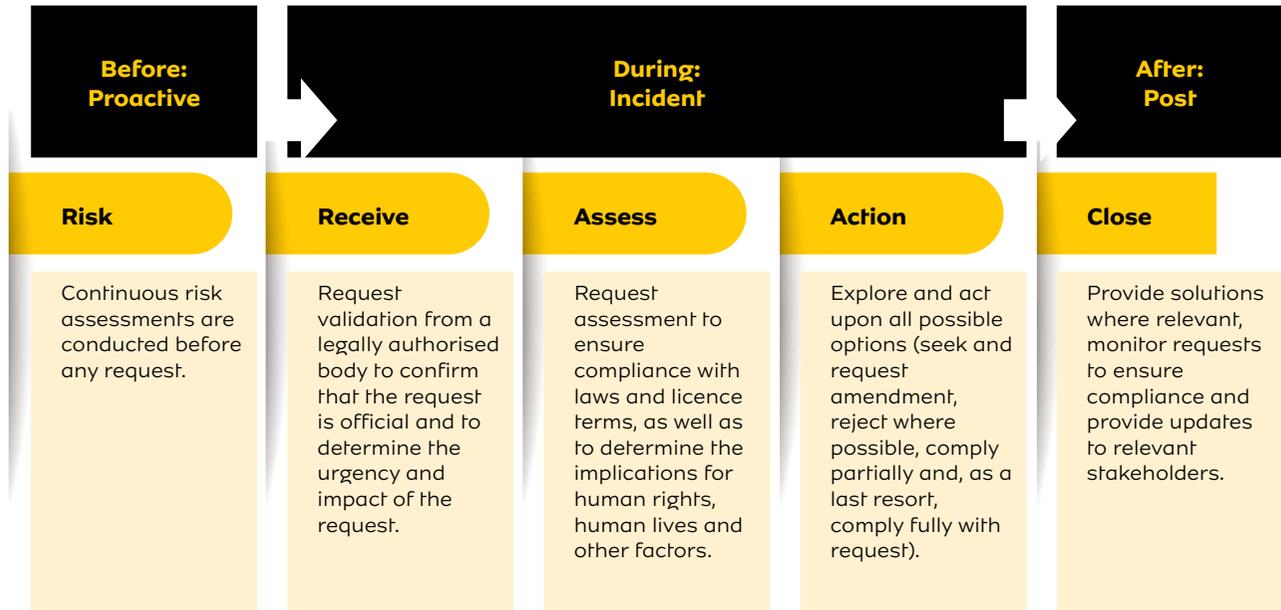
The same process is followed irrespective of whether it is a non-judicial government demand or court order from local or foreign government jurisdictions.

MTN will attempt to avoid negative human rights impacts where it identifies a risk of these rights being infringed.

1. Before: Proactive management

- **Conducting risk and impact assessments:** Digital human rights risk and mitigation plans are reviewed on a quarterly basis. Impact assessments are done on an annual to bi-annual basis.
- **Engaging stakeholders:** Engage with regulatory authorities, industry players and other stakeholders to discuss legislation, licence requirements and

MTN's digital human rights due diligence framework



solutions in relation to human rights risks, issues and opportunities.

2. During: Incident management

- **Managing requests or incidents:** In determining MTN's response to requests received from authorities and non-governmental entities, the following key steps are undertaken:
 - > All requests that may limit freedom of expression, access to information or privacy, or harm the information security of MTN's customers are evaluated following a due diligence approach to determine if the authorities and non-governmental entities are legally authorised to make the request and have followed the prevailing legal processes.
 - > MTN engages with relevant stakeholders for guidance before responding to requests to clarify the request, seek an amendment to the request, or seek that the request is set aside where possible.
 - > Review request in accordance with the laws and applicable regulatory requirements of the countries in which we operate. Where multi-jurisdictions are concerned, the various applicable laws, including international laws, will also be assessed.
 - > MTN assesses whether engaging with authorities to reject the request or partially comply with it will increase the risk to the safety of employees or compromise MTN's ability to continue operations.
 - > Following the due diligence and evaluation in terms of good governance, legal and risk management processes, we would respond in any of the following ways:
 - Reject the request where possible.
 - Partially comply with the request.
 - Fully comply with the request.

MTN's Digital human rights due diligence framework



- **Mitigating the impact of disruptions:** MTN ensures it communicates with impacted parties based on applicable law. We work to safeguard employees, customers, and partners for whom we are responsible and ensure the integrity of our infrastructure is maintained.
- **Situational stakeholder engagement:** MTN engages with various stakeholders to ensure their perspectives are obtained; to identify potential mitigations, and to manage the situation as effectively as possible. Grievances can be logged through our in-country customer complaints lines and via e-mail to HumanRights@mtn.com.

3. After: Post-incident management

- **Record-keeping:** To facilitate corporate learning and to obtain information required for stakeholder engagement and reporting, MTN strives to maintain a documented trail of evidence relating to relevant events, decisions and actions.
- **Remedies for affected customers and stakeholders:** MTN works to offer remedies to customers negatively impacted on a case-by-case basis.

Legal basis for compliance

Grounds for complying

MTN respects and endeavours to comply with the laws of the countries in which we operate. We conduct our business in accordance with applicable legislative, regulatory and licence requirements, with the intention of:

- Protecting the rights of our customers to access information and express themselves online.
- Protecting personal information.
- Providing safe communication services in the respective jurisdictions in which we carry out our operations.

MTN is committed to fair dealing when conducting its business and strives to always act with due skill, care and diligence. We have a low-risk appetite towards non-compliance with respect to legislative and regulatory requirements, recognising that non-compliance may result in fines, sanctions, and even the possibility of removal of an operating licence.

We strive to conduct our business by following the letter and spirit of the applicable regulatory and legislative requirements in the markets in which we operate. All

requests are reviewed in accordance with the legislative, regulatory, licence conditions rules, guidelines, ministerial/national security orders or directives, including directives relating to public safety (where applicable) and other related requirements with which MTN is required to comply.

The lawful reason provided or the requirement for which requests related to digital human rights is made, or as otherwise prescribed by regulatory requirements, is carefully considered. Where laws and/or licence conditions are not definitive or are in clear conflict with any international norms, we may seek further legal guidance. We will evaluate all possible risks associated with complying with or rejecting requests.

Reasons why MTN would comply:

- Support application of the law by any public body.
- Comply with a regulatory requirement.
- Support the conducting of any legal proceedings.
- Lawful purposes related to licence obligations.

Risk of complying with service restriction orders

- Loss of life.
- Security risk to staff, offices and infrastructure.
- Violation of human rights.
- Revenue loss.
- Possible litigation risk.
- Reputational risk.

VS

Risk of non-compliance with service restriction orders

- Non-compliance with licence conditions, which may result in loss of authorisation to operate.
- Expulsion, deportation and/or imprisonment of personnel.
- Harassment of staff and relatives.
- Inability to enforce and comply with contracts.
- Exposure to fines.
- Relationship breakdown between MTN and the authority.



Digital human rights due diligence framework continued



Licence conditions

Telecommunication licences are issued by regulatory bodies and authorise an operator to provide telecommunication services or operate telecommunication facilities. Licences define the terms and conditions of such authorisation and describe the major rights and obligations of an operator. Licence conditions vary per country depending on the legal system, which informs the obligation of each operator.

Licences provide for suspension, revocation and cancellation of a licence for various reasons of gross non-compliance such as fraud, false information, bankruptcy, receivership, failure to comply with a decision given by the authority. Suspension and cancellation can also be in the public interest. Measures vary depending on what is sanctioned or authorised by law or directed by authorities in the country in question. Any operator that may have committed an offence could also be liable to a fine or imprisonment.

Evolving obligation

The UNGPs, which state that a Company's responsibility to respect human rights applies in all situations and exists independently of whether the state meets its own human rights obligations. Furthermore, these responsibilities require companies to avoid infringing on the human rights of others and address adverse human rights impacts.

A report of the special rapporteur on the rights to freedom of peaceful assembly and of association – 'Ending Internet shutdowns: a path forward' – tabled at the June 2021 sitting of the UN Human Rights Council encapsulates the dichotomy aptly, and is worthy of quotation:

"The Special Rapporteur recognises that telecommunications companies operate within a framework of laws and government practices that may limit their capacity to prevent shutdowns from taking place. These companies operate under considerable business pressure, and in some cases, laws or licensing agreements might prevent them

from disclosing information about shutdowns. Moreover, workers of these companies are at risk of violence, arrest, and intimidation in the event of non-compliance with shutdown orders yet telecommunications providers' human rights responsibilities apply fully despite these constraints these companies need to take internet shutdowns seriously, push back against these measures, help mitigate their impacts and ensure accountability. [emphasis added]."

At the very least, international law appears to oblige MTN to do everything in its power to resist such orders. The UN Special Rapporteur recently gave direct praise to MTN at the recent sitting of the Human Rights Council:

"A positive recent development is Africa's MTN, which carried out internet shutdowns in several countries in the region. The Company committed to push back against such orders and notify users when carrying out shutdowns. These efforts need to be replicated and scaled up."



Roles, responsibilities and governance framework



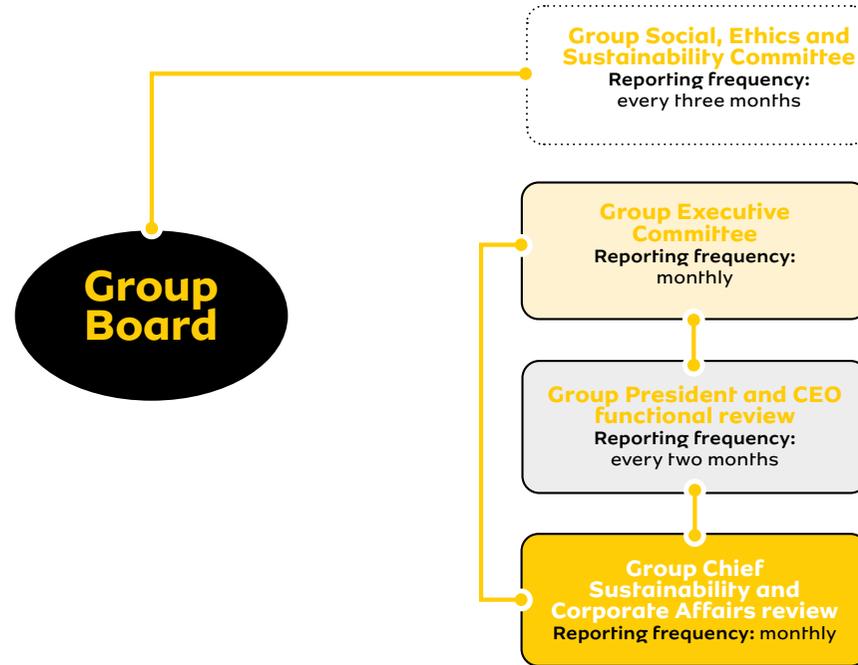
Governance and decision framework

Governance at MTN is structured in line with best practice. In 2021, we evolved the operational governance framework and structure to better align it with *Ambition 2025*.

The Social, Ethics and Sustainability Committee has oversight of Sustainability strategic ambitions, progress and milestones.

Governance of Digital Human Rights falls within the mandate of the Group Social, Ethics and Sustainability Committee on behalf of the MTN Group Board. It is tracked on an ongoing basis by the Group Executive Committee led by the MTN Group President and Chief Executive Officer (CEO). Regional vice presidents and country CEOs play a key role at a regional and country level within Digital Human Rights governance and decision-making.

Across the Group in each operating company, there are employees and executives responsible for the management of human rights issues. There are also escalation protocols to bring matters that are more serious in nature to the attention of executive management in each operating company, and to the Group Board.



Scope of the Group Social, Ethics and Sustainability Committee

Workplace

- Employment equity
- Decent work
- Employee safety and health
- Employee relations
- Education of employees
- Fair remuneration*
- Organisational ethics*

Environment

- Environmental impact
- Pollution*
- Waste disposal*
- Biodiversity*

Economy

- Economic development
- Fraud* and corruption
- Broad-based Black economic empowerment
- Responsible and transparent tax practices*

Society

- Community development
- Donations and sponsorships
- Public health and safety
- Advertising
- Consumer protection
- Consumer relations
- Human rights
- Stakeholders relations*

* King IV™ additions to statutory mandate of Social, Ethics and Sustainability Committee.

Impact management



The UN Guiding Principles on Human Rights states that, where it is necessary to prioritise actions to address actual and potential adverse human rights impacts, business enterprises should first seek to prevent and mitigate those that are most severe or where delayed response would make them irremediable.

Impact and risk assessments are a key element of MTN's digital human rights strategy, to enable us to identify areas where the risks and impacts of adverse human rights may be significant. Owing to the evolving nature of risks in digital communication, we work to update our digital human rights risk identification and mitigation plans on a quarterly basis. We conduct impact assessments on an annual to bi-annual cycle utilising internal and third parties as required.

Human rights assessment is an important part of a broader system of ongoing human rights due diligence.

It focuses on 1) identifying and prioritising actual or potential human rights impacts and 2) determining what appropriate action is required by the business to address these impacts. This includes determining:

- Scope: How many people could be affected by the adverse impact?
- Scale: How serious would the adverse impacts be for the victim?
- Remediability: Will remedy restore victim to the same or equivalent position before the harm?

During 2021, we took a decision to conduct digital human rights impact assessments (DHRIA) and partnered with BSR, an organisation of sustainable business experts that works with its global network of the world's leading companies to build a just and sustainable world during the first phase. The scope includes completing DHRIs for seven markets, including recommendations for how MTN can better manage and address human rights impacts at both the market and Group-level. As well as a deep dive assessment on human rights risks associated with

government requests, using case studies and based on GNI guidelines and best practices and the development of Human Rights Due Diligence tools for new business ventures, market assessment and new products.

The outcomes of the assessment will provide us with:

- The knowledge and insight required to take appropriate action to address its human rights impacts across eight key markets and more broadly.
- Improved management of government requests for information in accordance with the GNI principles.
- Enhanced capacity to conduct Human Rights Due Diligence on new business ventures and products.
- Skills, knowledge and insight necessary for the successful implementation of the UNGPs across MTN, leading to the increased respect for and realisation of human rights in MTN's markets.

Once the assessment is completed, MTN will make the findings available in our future reporting and will engage our stakeholders on the findings.

<p>States have a duty to PROTECT human rights</p>	<p>Policy commitment must be:</p> <ul style="list-style-type: none"> • Approved by the most senior level • Informed by relevant internal and external expertise • Explicit in stipulating human rights expectations of the business • Communicated throughout the business and be publicly available • Reflected in operational practices and procedures
<p>Companies have a responsibility to RESPECT human rights</p>	<p>Human rights due diligence must:</p> <ul style="list-style-type: none"> • Championed at the most senior level • Assess actual and potential human rights impacts • Integrate and act upon the findings • Track the effectiveness of responses • Communicate how impacts are identified and addressed
<p>Individuals whose rights are harmed by business must have access to REMEDY</p>	<p>To be effective, grievance mechanisms must be:</p> <ul style="list-style-type: none"> • Legitimate • Accessible • Predictable • Equitable and transparent • Rights-compatible • A source of continuous learning • Based on engagement and dialogue



Case study – eSwatini

Doing it right



In June and October 2021, MTN eSwatini was issued with two separate directives by the eSwatini Communications Commission (ESCCOM) to suspend its internet and social media services of its customers. After review and in adherence with its license conditions, MTN eSwatini complied with the directives.

The suspension of service order was a first of its kind in the country. In order to validate the legality of the order for suspension of services, MTN eSwatini reviewed the legislation relied upon by the Regulator to impose the order and reviewed the licence conditions and Constitution of Eswatini. Engagement with key stakeholders in the ICT sector and beyond took place regarding the directive and its implications on customers, business and society at large.

Following extensive engagements and measures, network connectivity was restored on the 10th day of the disruptions and customer remedies were implemented. In the second instance, through strategic engagements, MTN eSwatini was able to restore connectivity on the second day of the disruptions, limiting the duration and impact.

Some of the key lessons learnt includes continuing to insist on written communication when any directive is received on any order for suspension of services. And also communicating with customers regarding the genesis of the suspension of services to minimise impact on customers.



Responsible advocacy



Stakeholder engagement and accountability

MTN Group appreciates how relationships and reputation with stakeholders in its value chain and broader society has a direct impact on its socio-political licence to operate, and the interdependence between effective stakeholder management and organisational performance.

The MTN Stakeholder Management Policy guides the Company's approach to stakeholder engagement and seeks to bring about greater involvement of stakeholders and inclusion of stakeholder needs, interests and expectations in corporate decision-making. As part of the MTN Group Stakeholder and Reputation Management Framework, it governs how the Group relates to and engages with its stakeholders.

The 2021 MTN Reputation Index Survey set a record for stakeholder participation, surveying 5 219 stakeholder representatives of government, regulators, the investment community, media, civil society, subscribers/customers, suppliers, trade partners, industry, and organised business across 19 markets. Thirty-six percent of stakeholders strongly agree that MTN has sound digital human rights policy and processes. Twenty-six percent indicated that they do not know. As a result, there is a need for MTN to continue to communicate more widely its digital human rights approach and policies.



We engage with a range of stakeholders on issues of human rights, data protection and privacy and transparency. As it is not possible to engage with all our individual customers, we engage with media and advocacy groups, which have these topics as focus areas and priorities and have an ability to inform the general public. In this way, the voices of individual customers are represented at an organised level, in addition to the communication channels that are already available to them. Engagements with governments are also key. We engage in discussions on how to best keep society both safe and free.

The exchange of ideas and views on a range of topics pertaining to human rights are key to ensuring we understand and are also understood. These inputs are integral in developing Group policies and procedures. Examples of platforms that MTN participated in:

- GSMA 2021 – 2022 Human Rights Webinars – the Implementation Series on Human Rights due diligence, looking at how UNGPs define human rights due diligence and the different forms it can take as well as practical applications.
- ERM operationalising human rights 'from policy to practice' – addressing the challenges and opportunities of integrating human rights in business operations.
- Trialogue Business and Human Rights webinar – exploring how South African companies are faring when it comes to promoting, implementing and embedding human rights, and what best practice for integrating human rights into a business looks like.

Training of MTN's Board and staff members

To ensure that the Board, together with executives and operational staff remain abreast of the latest developments pertaining to human rights, a range of interventions are in place, including sending key staff to attend and participate in various platforms. During 2021, MTN participated in several events and platforms, exchanging insight and learnings. As one example, MTN employees from across markets participated in the GSMA Human Rights webinar 'Implementation Series' in 2021.



Responsible advocacy continued



Membership of associations

To stay informed and in line with best practices, share expertise and experience and provide input into industry policies, we are members and active participants in a few key industry bodies. Our membership of these bodies also provides an additional training mechanism as feedback on activities and thought leadership within these groups is provided to the Board.

MTN is a member of these key bodies:

- Signatory of the United Nations Global Compact.
- Member of GSMA and Sustainability Working Group.
- Centre for Internet Security.
- Information Security Forum.

The Global Network Initiative (GNI) has set global Principles on Freedom of Expression and Privacy (the GNI Principles). These Principles and Implementation Guidelines have been set by a variety of organisations with the goal of advancing and protecting freedom of expression and privacy in the information and communications (ICT) industry globally, in the face of government demands to restrict content or hand over user information.

In 2021, MTN conducted a GNI self-assessment against GNI's Principles and Implementation Guidelines and found that it covers majority of the areas. MTN has indicated its interest to become a member of the GNI and is currently within the GNI approval process.

The membership would hold MTN accountable through a system of (a) transparency with the public and (b) independent assessment and evaluation of the implementation of these principles. Membership would allow MTN to take a collaborative approach to problem solving and explore new ways in which the collective learning from multiple stakeholders can be used to advance freedom of expression and privacy; and engagement with governments and international institutions to promote the rule of law and the adoption of laws, policies and practices that protect, respect, and fulfil freedom of expression and privacy.



Disclosure and performance management



Highlights of improvements in MTN's digital human rights performance

We have improved our ranking in the Ranking Digital Rights Index and, in 2020, we were the most improved telecommunications company on the index. We have looked at the areas where there is room for improvement and taken much of that onboard, focusing not just on governance, but also on implementation.

Below are some of the actions that have underpinned the improvement in our RDR performance:

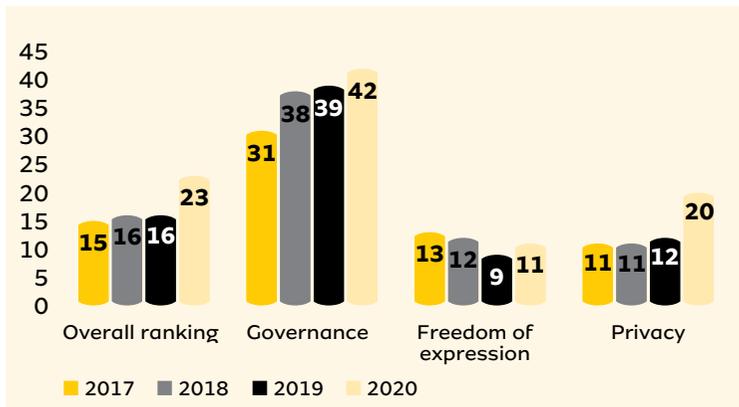
- We published revised position statements reaffirming our commitments to human rights and describing how we implement this.
- We published more information about our process for responding to external requests for user information.
- We enhanced security practices with our programme to involve third party verification to improve our understanding of possible areas of vulnerability.

The RDR Corporate Accountability Index for 2022 Telco Giants Scorecard will be launched in November 2022 incorporating information from 2021 and 2022.

We continue to identify opportunities to further enhance our human rights performance.



MTN's ranking digital rights performance (2017–2020) (%)



Case study – Zambia

Doing it right



Ahead of Zambian election, MTN Zambia, in alignment with risk management aspect of MTN's Digital Human Rights due diligence process, developed a detailed Election Crisis Management Plan and Stakeholder Engagement Plan.

Government stakeholders such as the Regulator and the Ministry of Justice were engaged. During these engagements, MTN's Digital Human Rights Policy was shared with the stakeholders, together with the provisions of the UN Guiding Principles on Business and Human Rights. In addition, a detailed legal analysis had been undertaken of the Zambian laws and possible provisions that could be used by the government to instruct restriction of service and possible responses on how to handle it.

In the afternoon on the day of Zambian elections during 2021, access to the internet was restricted by Zambian authorities. The internet and social media service restriction was undertaken remotely using the Telecommunication Traffic Monitoring System (TTMS) regulation.

Some of the key lessons from this incident were that increasing engagement with a wide range of stakeholders is necessary. Additionally, MTN's customer engagement had ensured that its customers understood that MTN Zambia did not restrict access, and as a result, its customers did not blame the Company. Despite the unexpected nature of the incident, good preparations meant that response options were already in place and an understanding of what was happening was able to be reached quickly.



Markets report

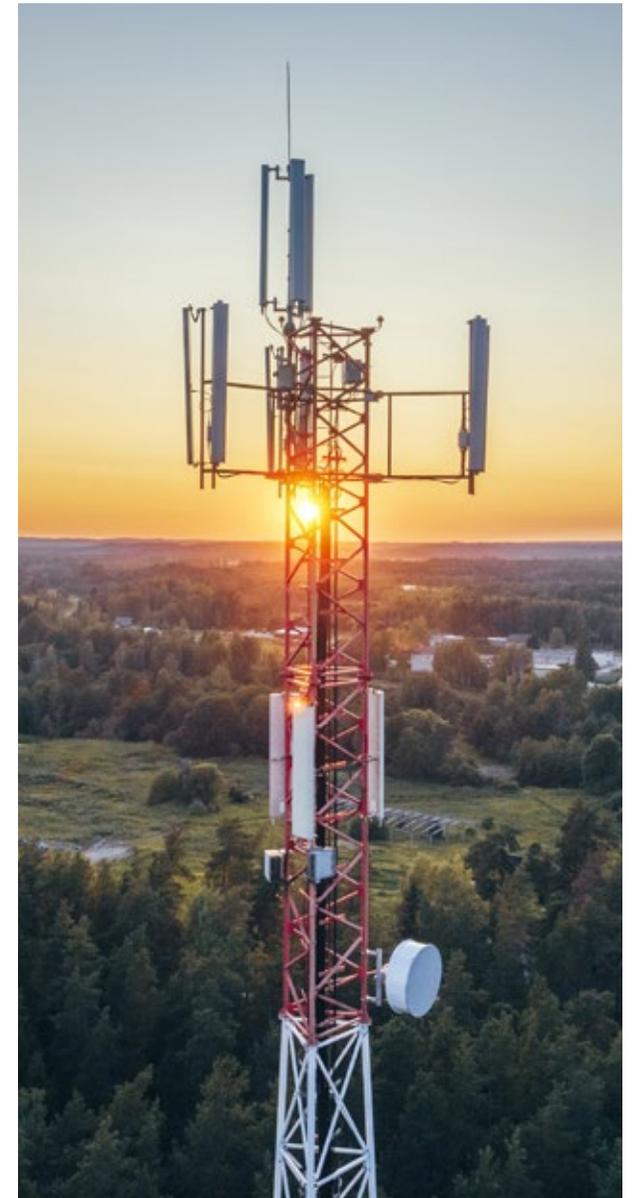


Categories of requests from authorities and NGOs

The markets have detailed the requests received from the authorities and non-governmental entities. Given the broad range of laws and requirements applicable to the markets, we have categorised the types of requests received from authorities as follows:

Data request type (authorities)	Data request description
 Requests pursuant to criminal investigations	Requests by authorities submitted pursuant to the terms of applicable laws or by virtue of a court order for information of subscribers in the context of criminal investigations, such as subscriber identification, call and SMS information, billing statement and historical location data. These requests do not include requests by authorities for the content of the underlying communications.
 Requests for location disclosure	Requests by authorities that are legally permitted by applicable laws or by virtue of a court order for the current location of a subscriber.
 Requests for lawful interception	Requests by authorities that are legally permitted by applicable laws or by virtue of a court order for the lawful interception of a subscriber's communication.
 Requests pursuant to governmental or regulatory oversight	Requests by authorities for information required by the authorities to perform their designated governmental or regulatory functions, including their oversight of telecommunication service providers.
 Requests pursuant to suspension of MSISDNs, and subscriber identification module (SIM) cards	Requests by authorities that are legally permitted by applicable laws or by virtue of a court order obliging mobile network operators to suspend/deactivate SIM cards or mobile subscriber integrated services digital network (MSISDN) numbers of subscribers.
 Service restriction orders and/or internet shutdown	Requests by authorities that are legally permitted by applicable laws or by virtue of a court order obliging mobile network operators to block or restrict a service or shutdown the internet / social media services.
Data request type (non-governmental entities)	Data request description
 Requests pursuant to civil litigation	These requests generally consist of requests made by non-governmental entities engaged in civil litigation with or on behalf of subscribers and subscriber requests for their own data.
 Requests for personal and private use	Subscribers may request access to their own data for several reasons, including to comply with a requirement from an embassy or a visa requirement.

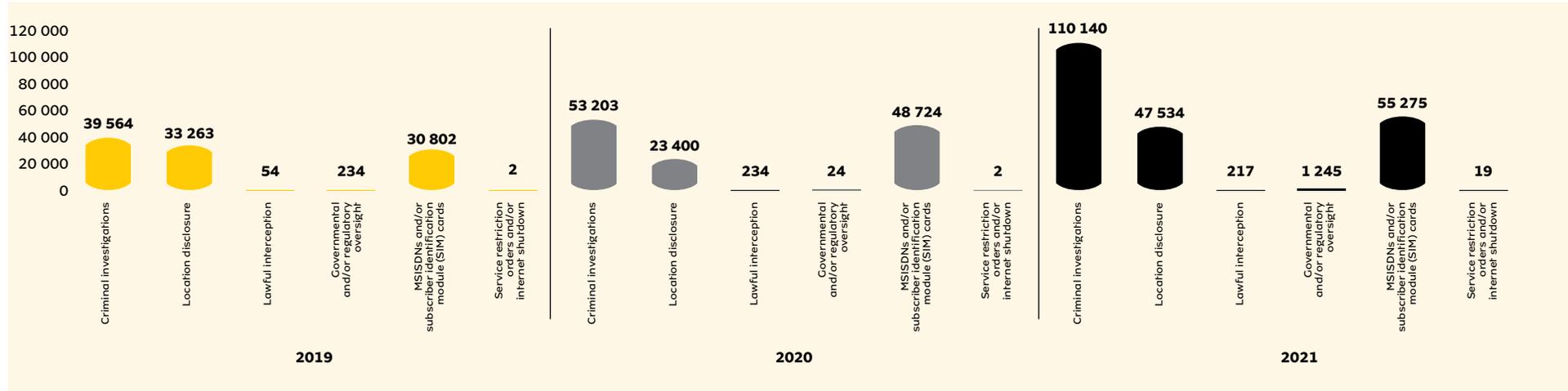
There may be, to some extent, an overlap between the abovementioned categories as certain requests received by a market may be broader than others.



Markets report continued



Requests from authorities



Overview of trends in transparency reporting

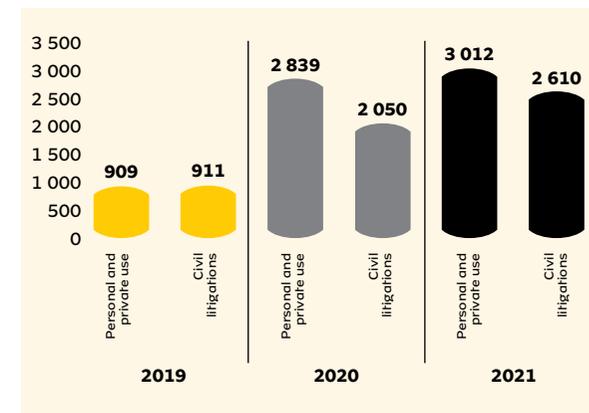
Since we published our first transparency report, covering 2019 requests, we have seen a significant increase across all categories of requests from authorities, with the exception of requests relating to government oversight.

The number of requests relating to service restrictions and internet shutdowns has increased from three to 19. Though this is negligible in contrast to the other categories, it has the largest impact on service continuity. While requests relating to criminal investigations still make up the lion's share of requests, the increase has been driven by increasing requests in Benin and Nigeria.

There have also been significant increases in requests from non-governmental authorities, mainly relating to civil litigation, and driven by increases in Ghana and Sudan. Although requests relating to personal and private use have also increased, the rise in requests relating to civil litigation has significantly outpaced that of private requests.



Requests from non-governmental entities



Afghanistan



Afghanistan

MTN has been present in Afghanistan since 2006. MTN has approximately **6.1 million** subscribers in Afghanistan. In 2021, MTN's revenue in Afghanistan was **R2.1 billion**.

Lawful interceptions

Legal framework:

The Government of the Islamic Republic of Afghanistan collapsed in August 2021 and has been replaced by an interim government created by the Taliban. There are currently no specific laws or regulations directly addressing Digital Human Rights in Afghanistan. However, the following laws may relate to Digital Human Rights:

- > Constitution of Afghanistan, published in official gazette no. 818, dated 28 January 2004.
- > Law for Regulating Telecommunication Services, published in official gazette no. 1031, dated 18 September 2010.
- > Penal Code, published in official gazette no. 1260, dated 15 May 2017.
- > Law on Banking of Afghanistan, published in official gazette no. 1197, dated 11 November 2015 .
- > The De Afghanistan Bank Law, published in official gazette no. 819, dated 19 February 2004.
- > Anti-Money Laundering Law, published in official gazette no. 1142, dated 23 July 2014.
- > Law on Access to Information, published in official gazette no. 1297, dated 31 March 2018.
- > Mass Media Law, published in official gazette no. 986, dated 6 July 2009.
- > Bar Association Law, published in official gazette no. 934, dated 17 December 2007.
- > Civil Servants Law, published in official gazette no. 951, dated 6 July 2008.
- > Population Registration Law, published in official gazette no. 1154, dated 16 December 2019.
- > Law on Consumer Protection, published in official gazette no. 1241, dated 28 December 2016.
- > Electronic Money Institution's Regulation, December 2020.

- > Electronic Fund Transfer Regulation, 2016.
- > Regulation on Protection of Customer's Rights in the Financial Sector, 2019.

Authorities:

- > Supreme Court.
- > Afghanistan Telecommunication Regulatory Authority.
- > Financial Dispute Resolution Commission.
- > High Economic Council.
- > Da Afghanistan Bank/the Central Bank of Afghanistan.
- > Attorney General.
- > Courts.
- > Telecommunication Regulatory Authority.
- > Judicial Organs.
- > Ministry of Finance.
- > Ministry of Public Health.
- > Access to Information Commission.
- > Ministry of Information and Culture.
- > Afghanistan Independent Bar Association.
- > Independent Administrative Reform and Civil Service Commission.
- > National Statistics and Information Authority.
- > Ministry of Industry and Commerce.

- > Ministry of Defence.
- > National Security Council.
- > Ministry of Interior.
- > Ministry of Communication Information and Technology (MCIT).

Authority requests fulfilled: **15 488**.

Authority requests declined: **0**.

Requests from authorities



Benin



Benin

MTN has been present in Benin since 2006. MTN has approximately **6.8 million** subscribers in Benin. In 2021, MTN's revenue in Benin was **R6.3 billion**.

Lawful interceptions

Legal framework:

- › 2012-15 Law of 18 March 2013 on the Code of Criminal Procedure in the Republic of Benin amended by Law 2018-14 of 14 February 2018 and Law No. 2020-23 of 29 September 2020.
- › Law No. 2015-07 of 20 March 2015 – Carrying information and communication code in the Republic of Benin.
- › Law No. 2015-08 of 8 December 2015 – Bearing the child code in the Republic of Benin.
- › Law No. 2017-08 of 19 June 2017 – Identifying individuals in the Republic of Benin.
- › Law No. 2017-20 – Digital Code in the Republic of Benin.
- › Law No. 2016-36 of 23 January 2017 – Regulation of credit information bureaus in the Republic of Benin.
- › Law No. 2017-44 of 5 February 2018 – Collection of intelligence in the Republic of Benin.
- › Law No. 2018-17 of 25 July 2018 – The fight against money laundering and the financing of terrorism in the Republic of Benin, amended by Law No. 2020-25 of 2 September 2020.
- › Law No. 2020-08 of 23 April 2020 – The modernisation of justice.
- › Law No. 2020-34 of 10 December 2020 – The simplification and dematerialised management of civil status.
- › Decree No. 2006-752 of 31 December 2006 – Establishing, attributions, organisation and functioning of the National Unit for the Processing of Financial Information.

- › Instruction No. 002-01-2015 of 13 January 2015 – Procedures for obtaining the customer's consent by data providers to the Credit Information Offices within the framework of the credit information sharing system in the WAMU member states.
- › Instruction No. 005-05-2015 of 8 May 2015 – Methods of transmission of information on Credit-to-credit Information Offices.
- › Instruction No. 007-05-2015 of 8 May 2015 – Methods of receiving and processing customer complaints by the Credit Information Offices.
- › Instruction No. 009-06-2015 of 15 June 2015 – Security systems of the information systems of the Credit Information Offices.
- › Decree No. 2016-465 of 3 August 2016 – The obligation to identify subscribers to electronic communications networks and services in the Republic of Benin.
- › Decree No. 2018-206 of 6 June 2018 – The attributions, organisation and functioning of the National Agency for the Identification of Persons.
- › Decree No. 2018-471 of 4 July 2018 – Defining the modalities and operation of the administrative framework for carrying out registration by way of exception to the civil status and setting the rules relating to the dematerialisation of documents.
- › Decree No. 2019-216 of 31 July 2019 – Setting the terms of granting licenses, authorisations, and conditions for making the declaration relating to the exercise of communications activities.
- › Decree No. 2020-187 of 11 March 2020 – Authorising the collection and processing by the Republican Police of personal data of travellers at the borders of Benin.
- › Decree No. 2020-249 of 22 April 2020 – Conditions for identifying users of electronic communications services.
- › Decree No. 2020-281 of 13 May 2020 – Fixing the conditions for establishing and operating Internet of Things networks and services in the Republic of Benin.
- › Decree No. 2014-418 of 4 August 2014 – Establishing the National Unit for Analysis and Intelligence on Terrorism.



Benin continued



Lawful interceptions continued

Legal framework continued:

- > Decree 2021-051 of 3 February 2021 – Fixing the limit values of exposure to electric, magnetic and electromagnetic fields and the modalities of control and inspection of radioelectric equipment and installations.
- > Decision No. 2021-360 of 20 December 2021 – Establishing the procedure for approval of equipment, national and international laboratories, and the conditions for recognition of standards and technical specifications in Benin.
- > The African Charter on Human and People's Rights.
- > Decree No. 2021-375 of 14 July 2021 approving the National Radio Frequency Plan in the Republic of Benin.
- > Decree No. 2021-550 of 27 October 2021 approving the security policy rules for state information systems in the Republic of Benin.

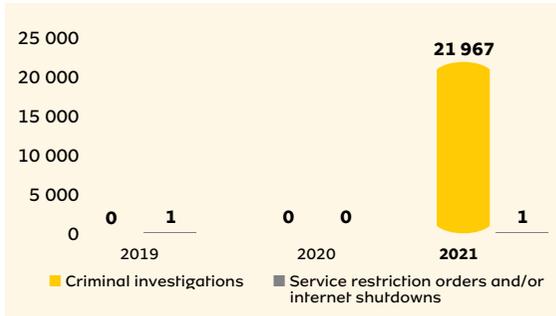
Authorities:

- > Ministry of Justice.
- > Human Rights Commission of Benin.
- > Constitutional Court.
- > Courts and tribunals of the country.
- > Digital and Communication Ministries.
- > Economic Crimes and Terrorism Court.
- > Authority of Post and Electronics Communication.
- > Regulatory Authority.
- > Personal Data Protection Authority.
- > National Agency for the Security of Information Systems.
- > National Financial Information Processing Units.
- > General Directorate of The Republican Police.

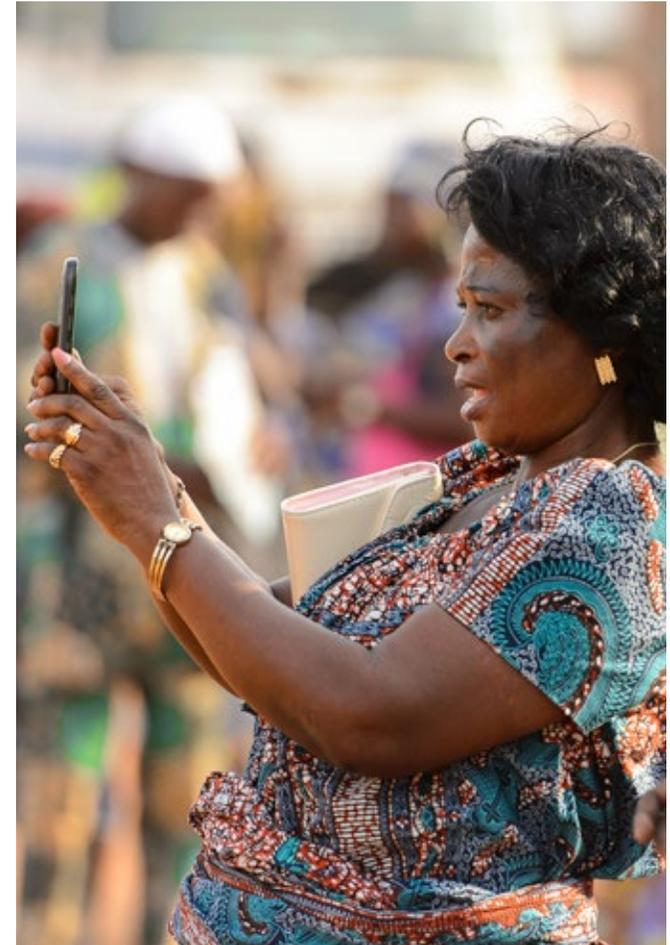
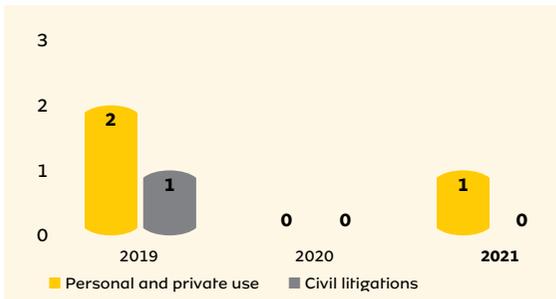
- > National Personal Identification Agency.
- > Ministry Of Economy and Finance.
- > Ministry in Charge of The Interior and Public Security and Cultures.
- > Ministry in Charge of National Defence.

Authority requests fulfilled: **21 967**.
 Authority requests declined: **4 294**.

Requests from authorities



Requests from non-governmental entities



Cameroon



Cameroon

MTN has been present in Cameroon since 2000. MTN has approximately **10.6 million** subscribers in Cameroon. In 2021, MTN's revenue in Cameroon was **R7.2 billion**.

Lawful interceptions

Legal framework:

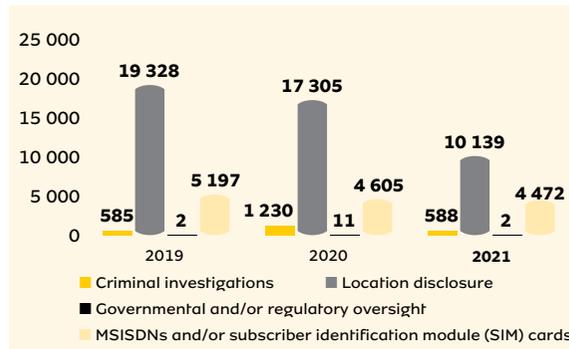
- > Law No. 2010/013 of 21 December 2010 regulating Electronic Communications in Cameroon as modified and completed by Law No 2015/006 of 20 April 2015.
- > Law No. 2010/012 of 21 December 2010 relating to Cybersecurity and Cyber Criminality.
- > Law No. 2010/021 of 21 December 2010 relating to electronic commerce in Cameroon.
- > Decree No. 2013/0399/PM of 27 December 2013 – Laying down the Modalities for the Protection of Consumers of Electronic Communications Services.
- > Decree No. 2015/3759 of 3 September 2015 – Laying down conditions for the identification of subscribers and terminal equipment of electronic communications networks.
- > Decree No. 2017/2580/PM of 6 April 2017 – Laying down conditions for the establishment and exploitation of electronic communication networks that are subject to the regime of authorisation.
- > Law No. 2015/007 of 20 April 2015 governing audiovisual activities in Cameroon.

Authorities:

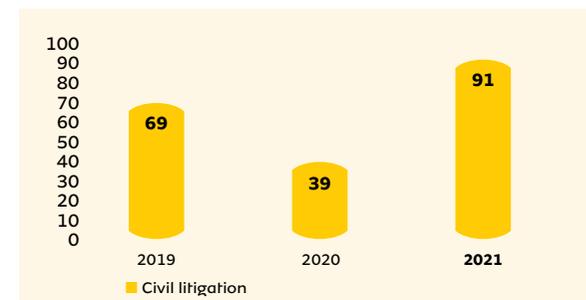
- > The Minister of Posts and Telecommunications.
- > The Telecommunications Regulatory Board.
- > The National Agency of Information and Communications Technology.
- > Banking Commission for Central Africa (COBAC).
- > Bank for Central Africa States (BEAC).
- > Ministry of Finance (MINFI).



Requests from authorities



Requests from non-governmental entities



Congo-Brazzaville



Congo-Brazzaville



MTN has been present in Congo-Brazzaville since 2005. MTN has approximately **3.2 million** subscribers in Congo-Brazzaville. In 2021, MTN's revenue in Congo-Brazzaville was **R3.4 billion**.

Lawful interceptions

Legal framework:

- > Law No. 8-2001 of 12 November 2001, on freedom of information and communication.
- > Law No. 9-2009 of 25 November 2009, on the regulation of electronic communications.
- > Law No. 11-2019 of 25 November 2019, on the creation of the regulatory agency for posts and electronic communications.
- > Law No. 29-2019 of 10 October 2019, on the protection of personal data.
- > Law No. 30-2019 of October 2019 on the creation of the national agency of information system security.
- > Law No. 26-2020 of 5 June 2020 on cybersecurity.
- > Law No. 27-2020 of 5 June 2020 on fighting cybercrime.
- > Law 43-2020 of 20 August 2020 authorising the ratification of the convention of the African Union on cybersecurity and the protection of personal data.
- > Article 18-20 of Law No. 073/84 of 17 October 1984 on Family Code.
- > Article 26 of the Constitution of the Republic of the Congo of 6 November 2015.

The Republic of Congo is one of six member countries of the Central African Economic and Monetary Community (CEMAC). As such, at a regional level, digital human rights are regulated by the CEMAC through:

- > Directive No. 06/08-UEAC-133-CM-18 defining the regime of universal service in the electronic communications sector among CEMAC state members.
- > Directive No. 07/08-UEAC-133-CM-18 defining the legal framework of network and electronic communication services users' rights and protection in the CEMAC.
- > Directive No. 08/08-UEAC-133-CM-18 on interconnection and access to network and electronic communications services in CEMAC state members.
- > Directive No. 09/08-UEAC-133-CM-18 harmonising the legal framework of electronic communication activities in CEMAC state members.
- > Directive No. 10/08-UEAC-133-CM-18 harmonising the rules of establishing and controlling tariffs for electronic communication services in the CEMAC.
- > Directive No. 21/08-UEAC-133-CM-18 harmonising the rules and regulations of electrical communication in the CEMAC.

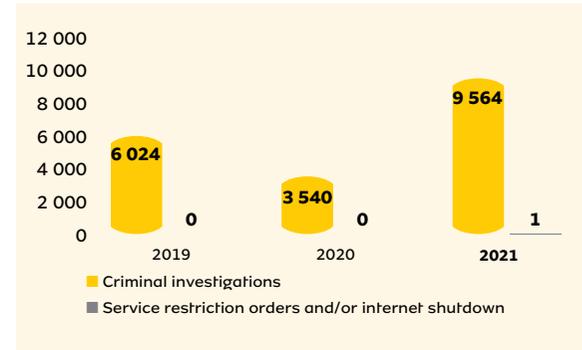


Authorities:

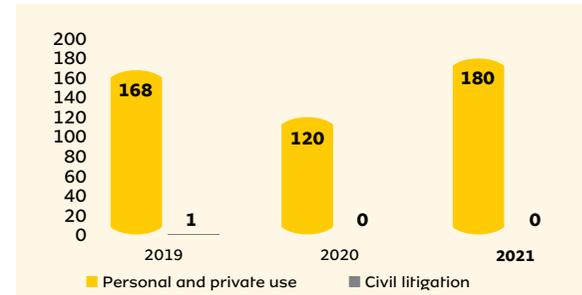
- > Post and Electronic Communications Regulatory Agency (ARPCE).
- > National Agency of Information Security System (ANSSI).
- > Posts and Telecommunications General Division (DGPT).
- > Central Bank.

Number of notifications made to affected subscribers in relation to requests submitted by the authorities: **1**.

Requests from authorities



Requests from non-governmental entities





Côte d'Ivoire

Côte d'Ivoire

MTN has been present in Côte d'Ivoire since 2005. MTN has approximately **14.6 million** subscribers in Côte d'Ivoire. In 2021, MTN's revenue in Côte d'Ivoire was an estimated **R8.9 billion**.

Lawful interceptions

Legal framework (at the national level):

- > Order No. 2012-293 of 21 March 2012 relating to Telecommunications and Information and Communication Technologies.
- > Law No. 2013-450 of 19 June 2013 on the protection of personal data.
- > Law No. 2013-451 of 19 June 2013 on the fight against cybercrime.
- > Law No. 2013-546 of 30 July 2013 on electronic transactions.
- > Law No. 2017-802 of 7 December 2017 on the orientation of the information society in Côte d'Ivoire.
- > Decree No. 2012-934 of 19 September 2012 on the organisation and operation of the Telecommunications/ICT Regulatory Authority of Côte d'Ivoire (ARTCI).
- > Decree No. 2013-301 of 2 May 2013 on the approval of terminal and radio equipment and the approval of installers.
- > Decree No. 2013-439 of 13 June 2013 setting the conditions and procedures for reserving, allocating and withdrawing numbering resources, as well as the amounts and procedures for payment of fees for the use of numbering resources.
- > Decree No. 2015-812 of 18 December 2015 approving the specifications attached to each individual licence in category C 1 A, for the establishment of networks and the provision of Telecommunications/ICT services.
- > Decree No. 2017-193 of 22 March 2017 on the identification of subscribers to Telecommunications/ICT services open to the public and users of cybercafés.
- > Decree 2018-875 of 22 November 2018 establishing the powers, composition, organisation

and functioning of the National Commission for the Development of the Information Society ("CNDSI").

- > Article 19 of the Constitution of the Republic of Côte d'Ivoire dated 8 November 2016.
- > Article 15 of Law No. 2015-493 dated 7 July 2015 combating terrorism.

Legal framework (at the community level):

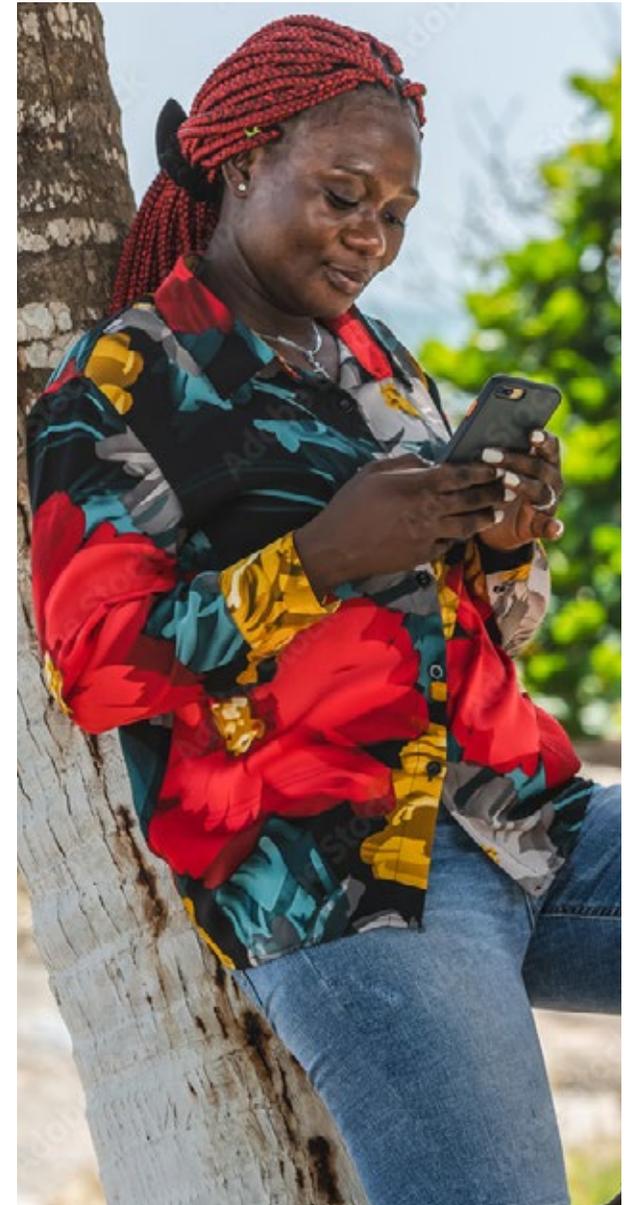
- > Directive No. 02/2006/CM/UEMOA on the harmonisation of legal regimes applicable to telecommunication network operators and service providers.
- > Additional Act A/SA. 3/01/07 ECOWAS of 19 January 2007 on the legal regime applicable to operators and service providers.

Authorities:

- > The Telecommunications/ICT Regulatory Authority of Côte d'Ivoire (ARTCI).
- > The Ivorian Agency for the Management of Radio Frequencies (AIGF).
- > National Agency for the Universal Service of Telecommunications (ANSUT).
- > Platform for Combating Cybercrime (PLCC).

Number of notifications made to affected subscribers in relation to requests submitted by the authorities: **1**.

Requests from authorities



eSwatini



eSwatini



MTN has been present in eSwatini since 1998. The joint venture has approximately **1.0 million** subscribers in eSwatini. In 2021, MTN's revenue in eSwatini was **R0.4 billion**.

Lawful interceptions

Legal framework:

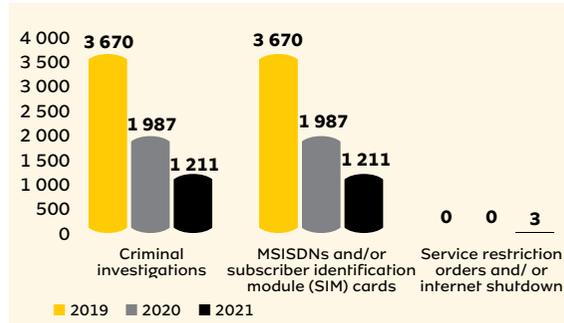
- > Swaziland Communications Commission Act No. 10/2013.
- > Electronic Communications Act No. 09/2013.
- > Swaziland Communications Commission (Consumer Protection) Regulations, 2016.
- > Swaziland Communications Commission (Subscriber Registration) Regulations, 2016.
- > Televisions Guidelines, 2017.
- > Data Protection Bill, 2020.
- > Computer Crime and Cybercrime Bill, 2017.
- > Section 18 of the Constitution (Protection from Inhumane Treatments) of the Kingdom of Eswatini Act No. 001/2005.
- > Section 24(1) and 24(2) of the Constitution of the Kingdom of Swaziland Act 1 of 2005.
- > Section 49(1) of the Criminal Procedure and Evidence Act 1938.

Authorities:

- > Ministry of Information, Communication and Technology (ICT).
- > Swaziland Communications Commission.
- > Courts.

Number of notifications made to affected subscribers in relation to requests submitted by the authorities: **2**.
 Authority requests fulfilled: **1 211**.
 Authority requests declined: **0**.

Requests from authorities and non-governmental entities





Ghana



Ghana

MTN has been present in Ghana since 2006. MTN has approximately **25.4 million** subscribers in Ghana. In 2021, MTN's revenue in Ghana was **R19.2 billion**.

> Investigations Bureau. Number of notifications made to affected subscribers in relation to requests submitted by the authorities: **3 418**.

Authority requests fulfilled: **1 194**.
 Authority requests declined: **78**.

Lawful interceptions

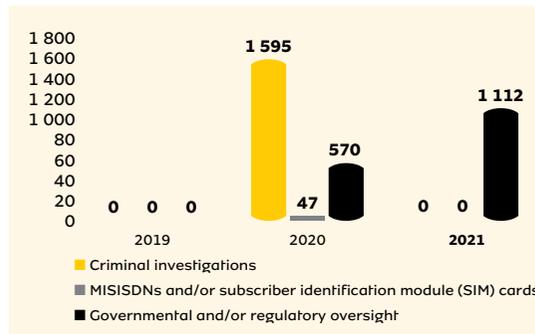
Legal framework:

- > 1992 Constitution.
- > Cybersecurity Act, 2020 (Act 1038).
- > Electronic Communications Act, 2008 (Act 775).
- > Electronic Transactions Act, 2008 (Act 772).
- > Data Protection Act, 2012 (Act 843).
- > Electronic Communications Regulations, 2011.
- > Establishment of Emergency Communications System Instrument, 2020 (EI 63).
- > Payment Systems and Services 2019 (Act 987).
- > Revenue Administration Act 2016, (Act 915).
- > Security and Intelligence Act , 1996 (Act 526).

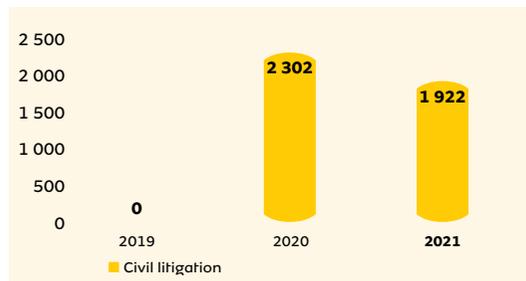
Authorities:

- > National Communications Authority.
- > National Cybersecurity Authority.
- > National Information Technology Agency.
- > Data Protection Commission.
- > Financial Intelligence Centre.
- > Economic and Organized Crime Office.
- > Bank of Ghana.
- > Courts.
- > Security and Law Enforcement Agencies–Ghana Police Service, National Intelligence Bureau (formerly Bureau of National Investigations), Ghana Prisons Service, Ghana Immigration Service, and Ghana Armed Forces.
- > National Security Ministry: National Signals Bureau and National.

Requests from authorities



Requests from non-governmental entities



Guinea-Bissau



Guinea-Bissau

MTN has been present in Guinea-Bissau since 2005. MTN has approximately **0.8 million** subscribers in Guinea-Bissau. In 2021, MTN's revenue in Guinea-Bissau was **R0.4 billion**.

Lawful interceptions

Legal framework:

- > Constitution of the Republic of Guinea-Bissau.
- > Resolution 2/2018, of 25 June 2018 – Approval of Government programme and initiatives.
- > Law 5/2010, of 27 May 2010 – Information Technology and Communications Framework Law.

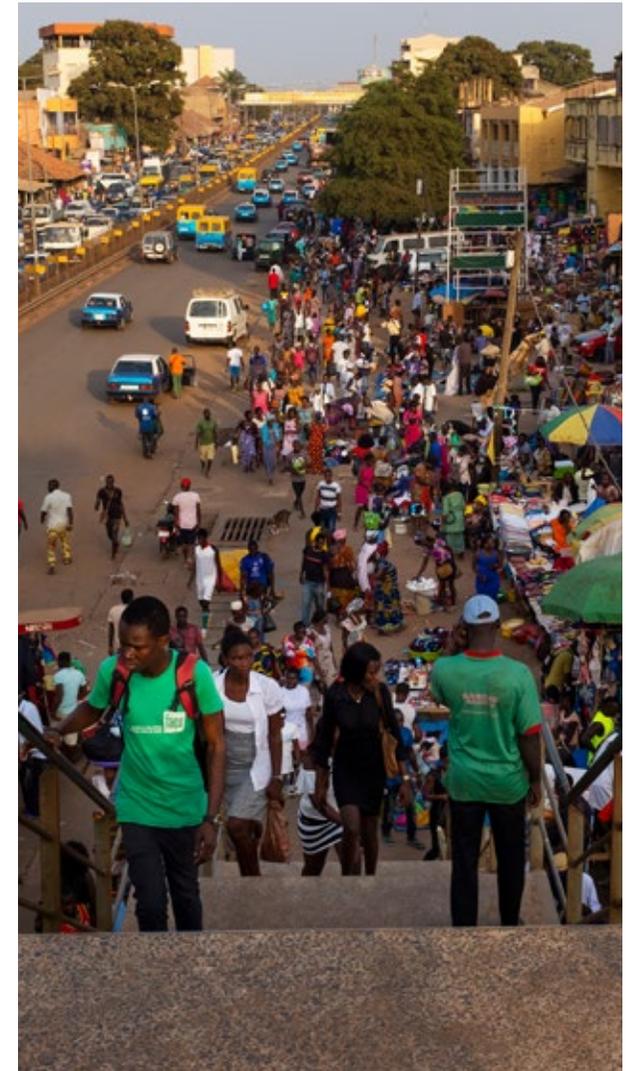
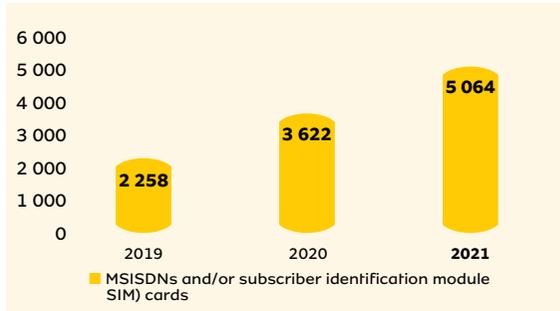
Authorities:

- > National Regulatory Authority.
- > National Council for Social Communication.
- > Criminal courts.
- > The Government of the Republic of Guinea-Bissau.

Authority requests fulfilled: **2 258**.

Authority requests declined: **0**.

Requests from authorities



Guinea-Conakry



Guinea-Conakry

MTN has been present in Guinea-Conakry since 2005. MTN has approximately **4.8 million** subscribers in Guinea-Conakry. In 2021, MTN's revenue in Guinea-Conakry was **R1.5 billion**.

Lawful interceptions

Legal framework:

- > Constitution of March 2020 was suspended and in place is the Transition Charter, 27 September 2021.
- > Law L/2016/059/AN dated 26 October 2016, carrying on Criminal Code of the Republic of Guinea under Title III – Cybercriminality (Act. 856 to Art. 879)
- > Law No. 2015/018/AN related to telecommunication and technologies of information in Republic of Guinea under Article 116 dated 13 August 2015
- > African Union Convention on Cybersecurity and the Protection of Personal Data dated 14 June 2014
- > Additional Act A/SA.1/01/10 related to protection of personal data in ECOWAS area dated 16 February 2010
- > Law L/2016/037/AN related to cybersecurity and the protection of personal data in Republic of Guinea dated 16 July 2016

Authorities:

- > Regulation Authority of Post and Telecoms (ARPT), Regulatory body.



Requests from authorities





Liberia



Liberia

MTN has been present in Liberia since 2005. MTN has approximately **1.9 million** subscribers in Liberia. In 2021, MTN's revenue in Liberia was **R1.1 billion**.

Lawful interceptions

Legal framework:

- > Article 15 of the Liberian Constitution (1986).
- > Telecommunications Act of 2007.
- > Supplementary Act A/As. 1/01/10 on Personal Data Protection within ECOWAS.
- > Amended Subscribers Identification Module (SIM) Cards/Removable User Identity Module (RUIM) Registration Regulations.
- > Liberia's country code Top Level Domain (ccTLD). Regulation for its Re-delegation, Management and Operations, 2020.
- > Regulations for the Treatment of Confidentiality, Dispute Resolution, Compliance and Enforcement 2009 LTA-REG-0002.
- > Regulation C/Reg .21/12/17 on Roaming on Public Mobile Communications Network in the ECOWAS region.
- > Interconnection Regulations 2009 LTA-REG-0003.
- > LTA Order: 0018-01-15-20 on the Implementation of Free Roaming on Public Mobile Communications Networks in the ECOWAS region.
- > LTA Order: 0018-03-12-20 Implementing the SIM card Registration Regulations.
- > Regulations on International Traffic LTA - REG - 0005. Draft Summary Regulation on National Numbering Plan LTA Reg - 007.
- > Draft Summary Regulation on National Numbering Plan LTA Reg - 007.

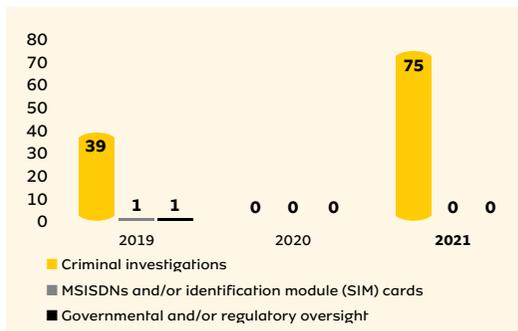
Authorities:

- > Liberia Telecommunications Authority.
- > Ministry of Justice.
- > Court of Liberia.

Authority requests fulfilled: **75**.

Authority requests declined: **0**.

Requests from authorities





Nigeria

Nigeria

MTN has been present in Nigeria since 2001. MTN has approximately **68.5 million** subscribers in Nigeria. In 2021, MTN's revenue in Nigeria was an estimated **R60 billion**.

Lawful interceptions

Legal framework:

- > NDPR Implementation Framework, 2020.
- > Section 37 of the Constitution of the Federal Republic of Nigeria, 1999.
- > Section 39 of the Constitution of the Federal Republic of Nigeria, 1999.
- > Cybercrime (Prohibition, Prevention, etc.) Act 2015.
- > Consumer Code of Practice Regulations, 2007.
- > Criminal Code Act.
- > Defamation Law of the various states.
- > Penal code and penal laws of the various states.
- > National Identity Management Commission Act.
- > Nigerian Communications Regulations, 2019.
- > Part 3 1-16 of the Nigerian Data Protection Regulation 2019.
- > Lawful Interception of Communications Regulations 2019.

- > Constitution of the Federal Republic of Nigeria, 1999 as amended.
- > Nigerian Communications Act, 2003.
- > Federal Competition and Consumer Protection Act, 2019.
- > Section 47(1)(e) of the Mutual Assistance in Criminal Matters Act 2019.
- > Section 38(5) of the Cybercrimes (Prohibition, Prevention, etc.) Act, 2015.
- > Section 8 of the Nigerian Communications (Enforcement Process, etc.) Regulations, 2019.
- > Section 20, 26 and 28 of the National Identity Management Commission Act, 2007.
- > Constitution of the Federal Republic of Nigeria, 1999 as amended.
- > Nigerian Communications Act, 2003.
- > The Federal Competition and Consumer Protection Act, 2019.

Authorities:

- > National Information Technology Development Agency (NITDA).
- > Various law enforcement agencies are responsible for the implementation and enforcement of the provisions of the Cybercrime (Prohibition, Prevention, etc.) Act 2015; however, the office of the National Security Adviser is the co-ordinating

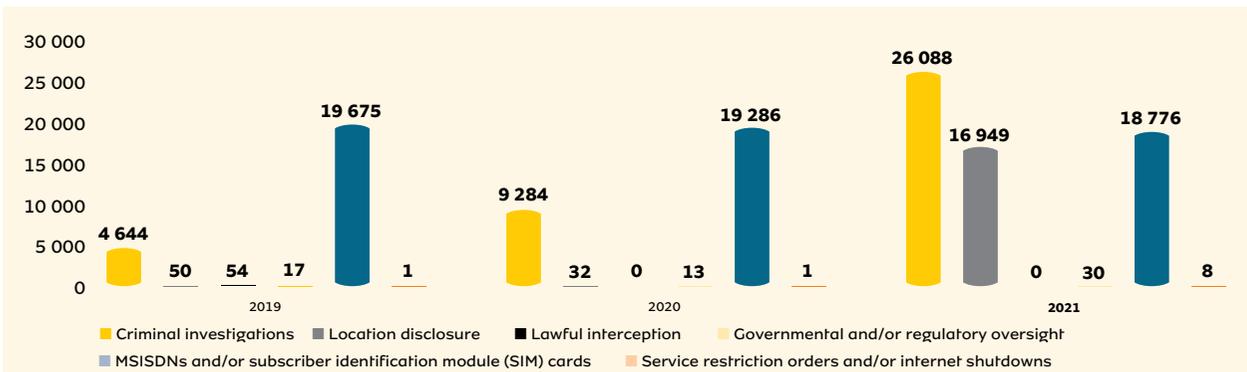
- body for all security and enforcement agencies under the Act.
- > Nigerian Communications Commission.
- > Nigerian courts.
- > Relevant authorities defined under section 20 of the Nigerian Communications Regulations, 2019.
- > National Identity Management Commission.
- > Nigerian Armed Forces and other Paramilitary establishments.
- > Ministry of Communications and Digital Economy.
- > Federal Competition and Consumer Protection Commission.
- > Nigeria Police Force (NFF) and other Law Enforcement Agencies (Nigerian Armed Forces and other Paramilitary establishments).

Authority requests fulfilled: **26 118**.

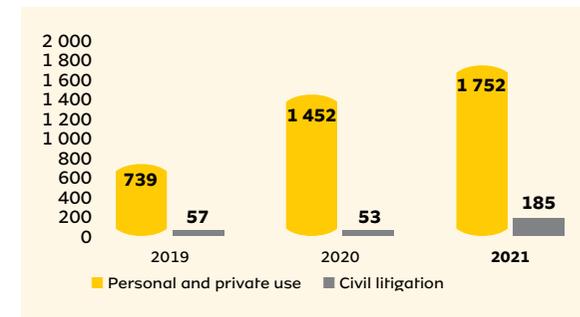
Authority requests declined: **0**.



Requests from authorities



Requests from non-governmental entities



Rwanda



Rwanda

MTN has been present in Rwanda since 1998. MTN has approximately **6.4 million subscribers** in Rwanda. In 2020, MTN's revenue in Rwanda was **R2.8 billion**.

Lawful interceptions

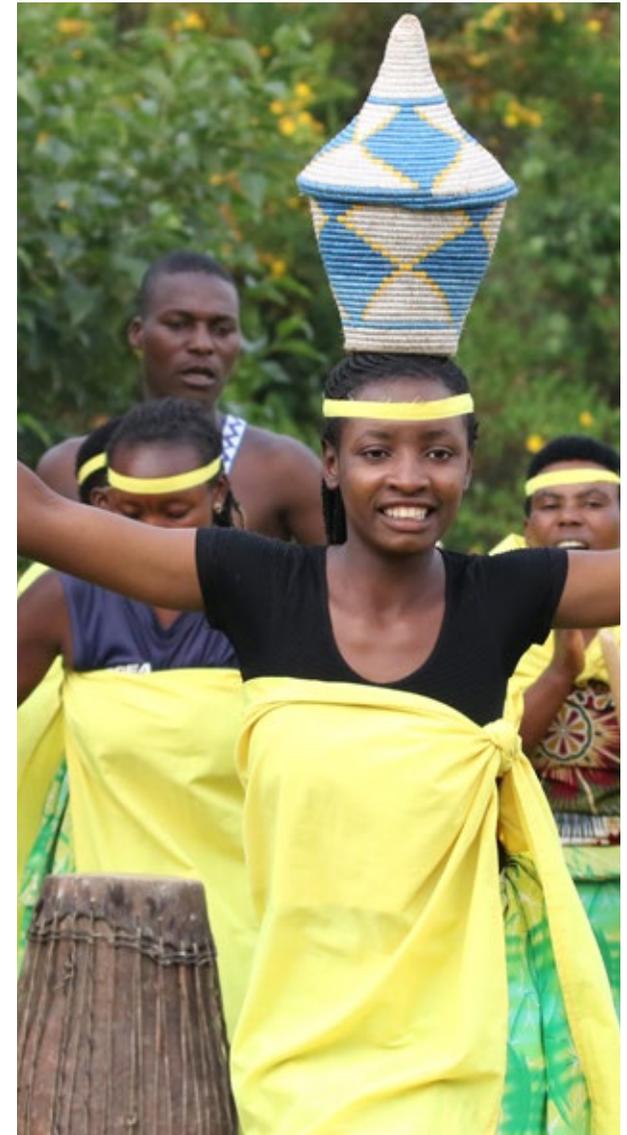
Legal framework:

- > The Constitution of Rwanda 2003 with Amendments through 2015.
- > Law No. 04/2013 of 8 December 2013 relating to access to information.
- > Law No. 24/2016 of 18 June 2016 governing Information and Communication Technologies.
- > Law No. 02/2017 of 18 February 2017 establishing Rwanda Information Society Authority and determining its mission, organisation and functioning.
- > Law No. 26/2017 of 31 May 2017 establishing the National Cybersecurity Authority and determining its mission, organisation and functioning.
- > Law No. 09/2013 of 1 March 2013 establishing Rwanda Utilities Regulatory Authority (RURA) and determining its mission, organisation and functioning.
- > Law No. 60/2018 of 22 August 2018 on Prevention and Punishment of Cybercrimes.
- > Law No. 60/2013 of 22 August 2013 regulating the Interception of communications.
- > Law No. 02/2013 of 8 February 2013 regulating Media.
- > Law No. 73/2018 of 31 August 2018 governing Credit Reporting System.
- > Draft Regulation Governing use of Personal data in Rwanda 2019 (this remains in draft form).
- > Regulations Governing Cybersecurity of 2020.

- > Article 14 of the Regulation governing the Electronic Money Issuers No. 08/2016 of 1 December 2016.
- > Regulations on Protection of Payment Service Users (2020) – Article 47.
- > Law No. 75/2019 of 29 January 2020 on Prevention and Punishment of Money Laundering, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction (Articles 9–13).
- > Law Relating to the Protection of Personal Data and Privacy No. 058/2021 of 13 October 2021. Law No 061/2021 of 14 October 2021 governing the payment system.
- > Law No 017/2021 of 3 March 2021 relating to financial service consumer protection.
- > Article 3.6 of MTN Rwandacell's Individual Licence (July 2021 – under new licensing framework, the former Cellular Mobile Licences are now called Individual Licences).
- > New SIM Registration and SIM Swap Process (July 2021) the amended Regulations that will encompass this process are in draft form, shared this week for consultation. (i) Rwanda Utilities Regulatory Authority (RURA); (ii) The Ministry of ICT and Innovation; and (iii) The National Bank of Rwanda established by Law No° 48/2017 of 23/09/2017.

Authorities:

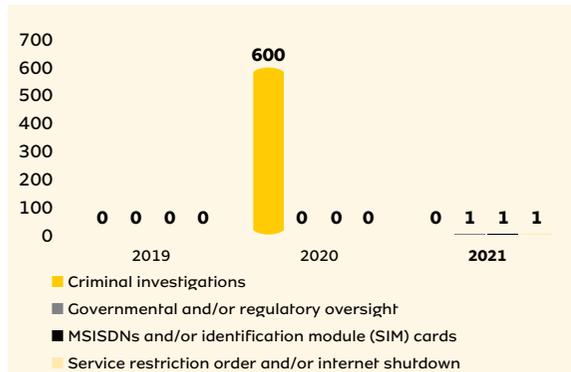
- > Rwanda Information Society Authority (RISA) is established by Law No. 02/2017 of 18 February 2017.
- > National Cybersecurity Authority (NCSA) is established by Law No. 26/2017 of 31 May 2017.



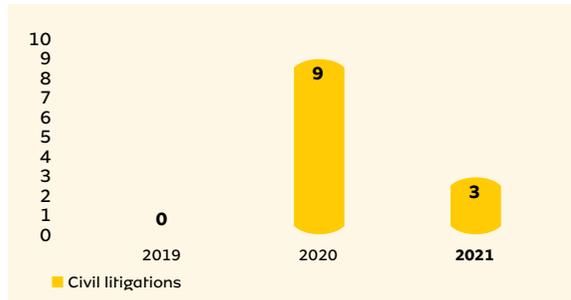
Rwanda continued



Requests from authorities



Requests from non-governmental entities



South Africa



South Africa

MTN has been present in South Africa since 1994. MTN has approximately **35 million** subscribers in South Africa. In 2021, MTN's revenue in South Africa was **R48.7 billion**.

Lawful interceptions

Legal framework:

- > Constitution of the Republic of South Africa, 1996.
- > Promotion of Access to Information Act, 2 of 2000.
- > Regulation of Interception of Communications and Provision of Communication-related Information Act, No. 70 of 2002.
- > Electronic Communications and Transactions Act, 25 of 2002.
- > Electronic Communications Act, 36 of 2005.
- > Consumer Protection Act, 68 of 2008.
- > Protection of Personal Information Act, 4 of 2013.
- > Cybercrime Act, 19 of 2020.

Authorities:

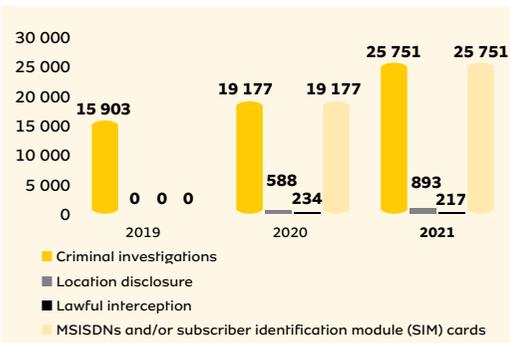
- > Department of Justice and Constitutional Development.
- > South African Human Rights Commission.
- > National Prosecuting Authority of South Africa.
- > South African Police Services.
- > South African Defence Force.
- > State Security Agency.
- > Information Regulator (South Africa).
- > In addition, the above laws, acts, regulations, the terms of any licence or other legal instruments referred to above are interpreted and ruled upon by the South African judiciary, which is a separate organ of State from the executive branch (which operates the above-mentioned state authorities).

Authority requests fulfilled: **25 751**.

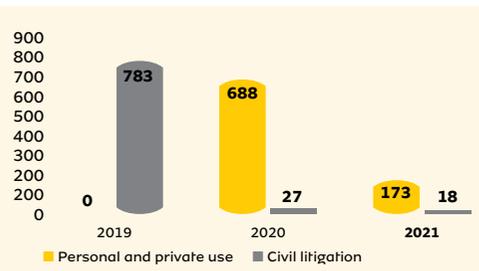
Authority requests declined: **49**.



Requests from authorities



Requests from non-governmental entities





South Sudan



South Sudan

MTN has been present in South Sudan since 2011. MTN has approximately **2.1 million** subscribers in South Sudan. In 2021, MTN's revenue in South Sudan was **R3.0 billion**.

Lawful interceptions

Legal framework:

- > Transitional Constitution of the Republic of South Sudan.
- > Right of Access to Information Act, 2013.
- > National Communication Act, 2012.
- > Penal Code, 2008.
- > National Communications Licensing Regulations, 2016.
- > Media Authority Act 2013, No. 64.
- > Broadcasting Corporation Act 2013, No. 63.
- > National Security Services 2014.
- > Electronic Money Regulations of South Sudan 2017.
- > The Anti- money Laundering and Counter Terrorist Financing Act 2012.

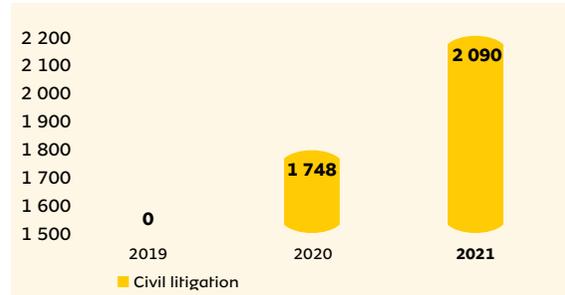
Authorities:

- > Ministry of Information Communication. Technology and Postal Services.
- > Information Commission.
- > National Communication Authority.
- > High Court.
- > Supreme Court.
- > Bank of South Sudan.
- > Financial Intelligence Unit.
- > National Police Service.
- > Criminal Investigation Department.

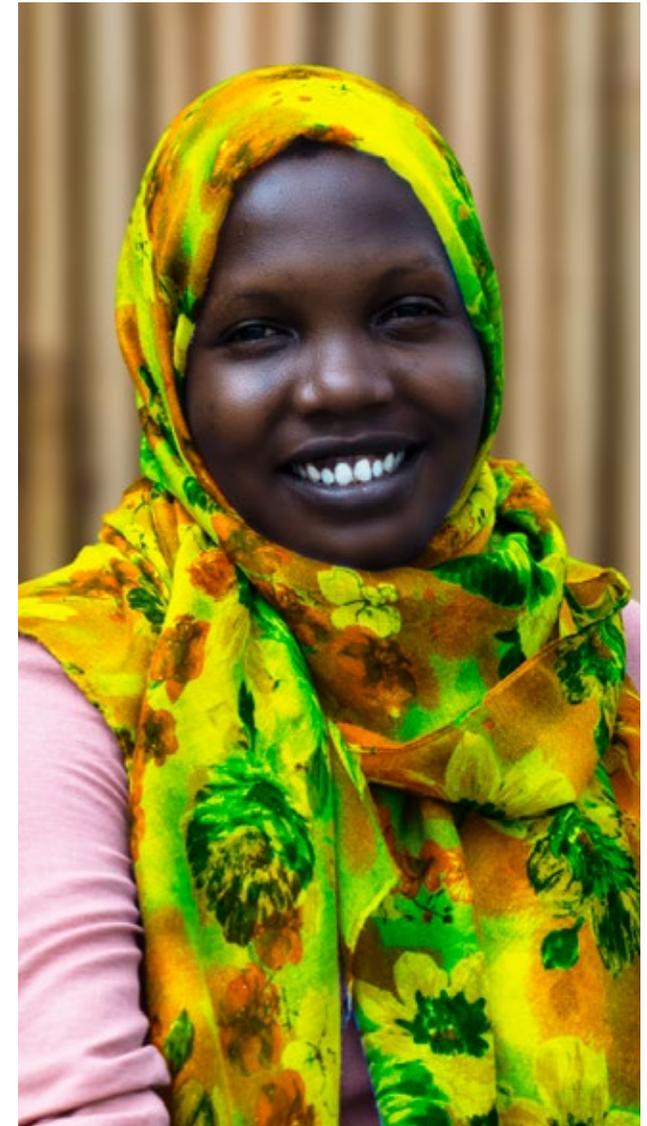
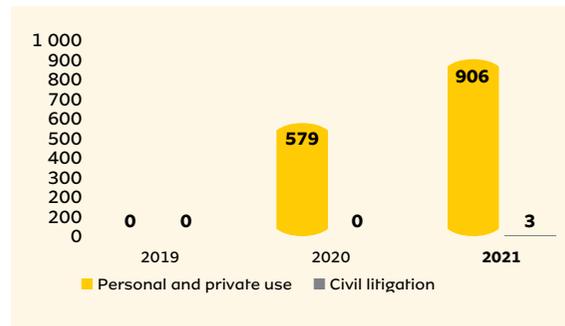
Authority requests fulfilled: **2 090**.

Authority requests declined: **0**.

Requests from authorities



Requests from non-governmental entities



Sudan



Sudan

MTN has been present in Sudan since 2005. MTN has approximately **9.2 million** subscribers in Sudan. In 2021, MTN's revenue in Sudan was **R2.2 billion**.

Lawful interceptions

Legal framework:

- > Draft Constitutional Charter for the Transitional Period, 2019.
- > Telecommunications and Post Regulation Act, 2018.
- > General Telecommunications Regulation, 2012.
- > Electronic Transactions Act, 2007.
- > Combating Information Crimes Act, 2018.
- > Access to Information Act, 2015.
- > Licence Agreement between Telecommunications Companies and the Telecommunications and Post Regulatory Authority.
- > Press and Press Printed Materials Act, 2009.
- > Criminal Code, 1991.

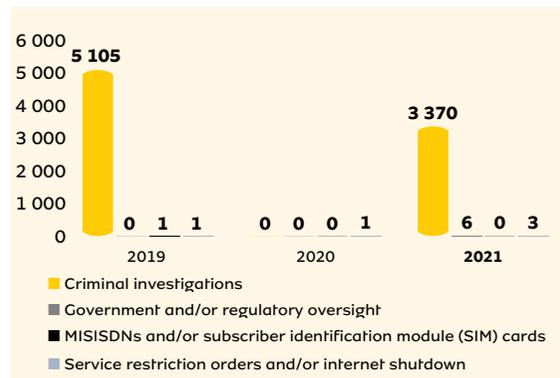
Authorities:

- > Constitutional Court.
- > Minister of Communications and Information Technology.
- > Telecommunications and Post Regulatory Authority.
- > Information Crimes Court.
- > Information Prosecution.
- > Information Police.
- > Right of Access to Information Commission.
- > General Court.
- > Press and Press Printed Materials National Council.

Number of notifications made to affected subscribers in relation to requests submitted by the authorities: **10**.
 Authority requests fulfilled: **3 370**.
 Authority requests declined: **0**.



Requests from authorities





Uganda



Uganda

MTN has been present in Uganda since 1998. MTN has approximately **15.7 million** subscribers in Uganda. In 2021, MTN's revenue in Uganda was **R8.5 billion**.

Lawful interceptions

Legal framework:

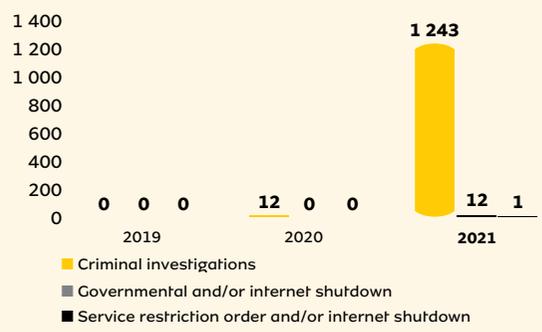
- > Article 27(2) and 29 of the Constitution of the Republic of Uganda, 1995.
- > Section 50(1), 56, 79.80, 86 of the Uganda Communications Act, 2013.
- > Section 64 and 68 of the National Payment Systems Act, 2020.
- > Section 7, 8(1), 11, 38A, 120, 123 of the Anti-money Laundering Act, 2013 (as amended).
- > Section 2, 8, 10, 11 and 15 of the Regulation of Interception of Communications Act, 2012.
- > Section 7 and 9 and 29 of the Data Protection and Privacy Act, 2020.
- > Regulation 15, and 32 of the Data Protection and Privacy Regulations, 2021.
- > Section 10, 11, 24, 25 and 26 of the Computer Misuse Act, 2011.
- > Section 32(2) of the Electronic Transactions Act, 2011.
- > Regulation 8(g) (h), 9, 13, 15, 17 of the Uganda Communications (Intelligent Network Monitoring System) Regulations, 201920.
- > Uganda Communications (Centralised Equipment Identification Register) Regulations 201920.
- > Regulation 7, 8, 11, 23 of the Uganda Communications (Text and Multimedia Messaging) Regulations, 201920.
- > Regulation 5(k) (o), 10, 16, 18, 34 of the Uganda Communications (Consumer Protection) Regulations, 201920.
- > Regulation 5 of the Uganda Communications (Content) Regulations, 201920.
- > Guideline 12(c)(i) – (iii) of the Mobile Money Guidelines, 2013.

Authorities:

- > Uganda Police Force.
- > Uganda Communications Commission.
- > National Information Technology Authority.
- > Central Bank of Uganda.
- > Ministry of Internal Affairs.
- > Ministry of Information Communications Technology and National Guidance.
- > Financial Intelligence Authority.
- > National Identification and Registration Authority.
- > Data Protection Office.

Number of notifications made to affected subscribers in relation to requests submitted by the authorities: **13**.
 Authority requests fulfilled: **12 455**.
 Authority requests declined: **0**.

Requests from authorities



Requests from non-governmental entities





Zambia



Zambia

MTN has been present in Zambia since 2005. MTN has approximately **8.1 million** subscribers in Zambia. In 2021, MTN's revenue in Zambia was **R2.4 billion**.

Lawful interceptions

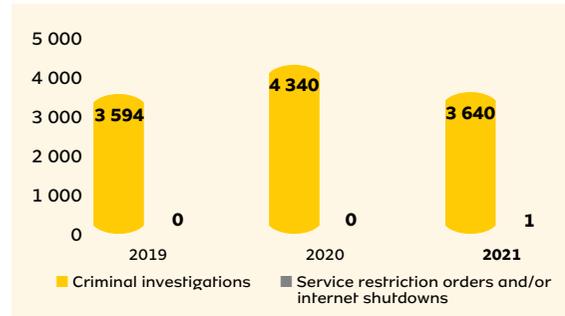
Legal framework:

- > The Constitution of Zambia (Amendment) Act No. 12 of 2016.
- > The Cybers Security and Cyber Crimes Act No. 2 of 2021.
- > The Electronic Communications and Transactions Act No. 4 of 2021 (the "ECT Act").
- > The Data Protection Act No. 3 of 2021.
- > The Financial Intelligence Centre Act No. 46 of 2010.
- > The Zambia Information and Communication Technology Agency Network Licence Standard Terms and Conditions.
- > Statutory Instrument No. 80 of 2015. The Information and Communication Technologies (Telecommunication Traffic Monitoring) Regulations issued pursuant to the Electronic Communications and Transactions Act No. 21 of 2009.
- > Regulation 40 of The Electronic Communications and Transactions (General) Regulations, Statutory Instrument No. 71 of 2011 issued pursuant to the Electronic Communications and Transactions Act No. 21 of 2009.

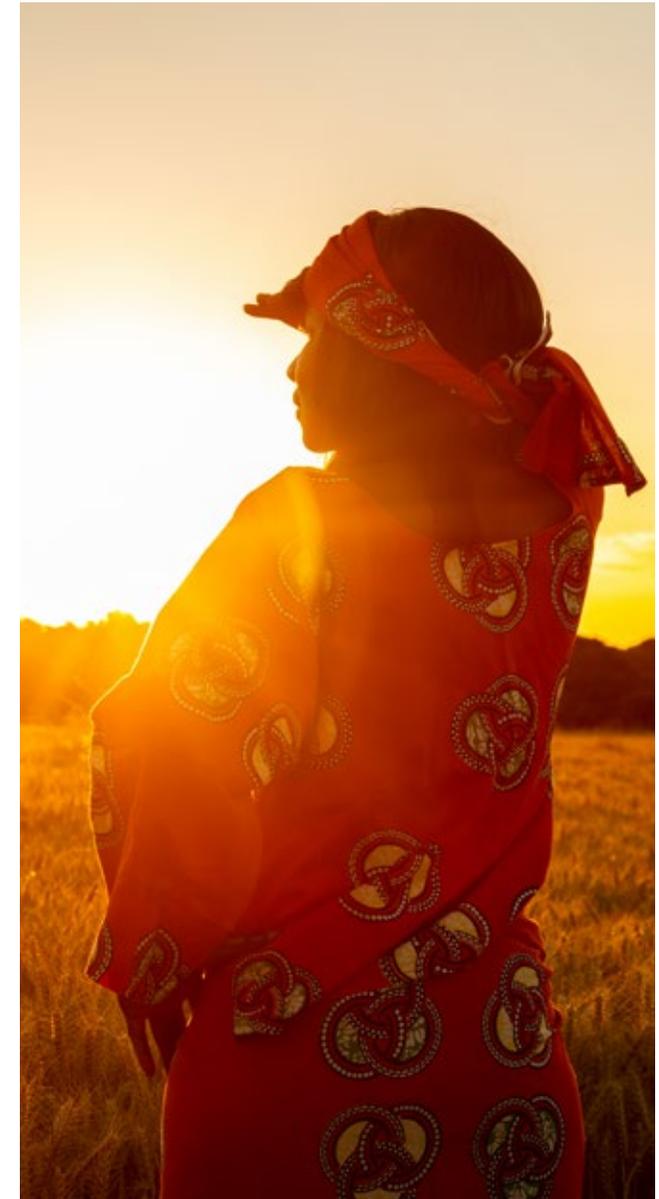
Authorities:

- > Zambia Information and Communication Technology Agency established under the Information and Communication Technologies Act No. 15 of 2009.
- > Zambia Police Service established under the Constitution.
- > Anti-Corruption Commission established under the Anti-Corruption Act No. 3 of 2012.
- > Zambia Security Intelligence Service established under the Zambia Security Intelligence Service Act, Chapter 109 of the Laws of Zambia.
- > Drug Enforcement Commission.
- > Human Rights Commission.
- > Financial Intelligence Centre.
- > Anti-money Laundering Investigations Unit.
- > Zambia Revenue Authority.

Requests from authorities



Requests from non-governmental entities



Administration



MTN GROUP LIMITED

Incorporated in the Republic of South Africa

Company registration number:

1994/009584/06

ISIN: ZAE000042164

Share code: MTN

Board of directors

MH Jonas*

KDK Mokhele*

RT Mupira¹

TBL Molefe¹ (appointed 1 April 2021)

NP Gosa* (appointed 1 April 2021)

CWN Molope* (appointed 1 April 2021)

PB Hanratty^{2*}

S Kheradpir^{3*}

SN Mabaso-Koyana*

SP Miller^{4*}

NL Sowazi*

BS Tshabalala*

SLA Sanusi^{5*}

VM Rague^{6*}

¹ Executive

² Irish

³ American

⁴ Belgian

⁵ Nigerian

⁶ Kenyan

* Independent non-executive director

Group Company Secretary

PT Sishuba-Bonoyi

Private Bag X9955, Cresta, 2118

Registered office

216 – 14th Avenue

Fairland

Gauteng, 2195

American depository receipt (ADR) programme

Cusip No. 62474M108

ADR to ordinary share 1:1

Depository: The Bank of New York Mellon

101 Barclay Street, New York NY, 10286, USA

MTN Group sharecare line

Toll free: 0800 202 360 or +27 11 870 8206 if phoning from outside South Africa

Transfer secretaries

Computershare Investor Services

Proprietary Limited

Registration number 2004/003647/070

Rosebank Towers, 15 Biermann Avenue

Rosebank, 2196

PO Box 61051, Marshalltown, 2107

Joint auditors

PricewaterhouseCoopers Inc.

4 Lisbon Lane, Waterfall City, Jukskei View,

Johannesburg, South Africa, 2090

Ernst & Young Inc.

102 Rivonia Road, Sandton, Johannesburg,

South Africa, 2146

Lead sponsor

Tamela Holdings Proprietary Limited

Ground Floor, Golden Oak House,

35 Ballyclare Drive, Bryanston, 2021

Joint sponsor

JP Morgan Equities (SA) Proprietary Limited

1 Fricker Road, cnr Hurlingham Road,

Illovo, 2196

Attorneys

Webber Wentzel

90 Rivonia Road, Sandton, 2196

PO Box 61771, Marshalltown, 2107

Contact details

Telephone: National 083 869 3000

International +27 11 912 3000

Facsimile: National 011 912 4093

International +27 11 912 4093

E-mail: humanrights@mtn.com

Website: <http://www.mtn.com>

Date of release: 25 April 2022

Forward-looking information

Opinions and forward-looking statements expressed in this report represent those of the Company at the time. Undue reliance should not be placed on such statements and opinions because by nature, they are subjective to known and unknown risk and uncertainties and can be affected by other factors that could cause actual results and company plans and objectives to differ materially from those expressed or implied in the forward-looking statements.

Neither the Company nor any of its respective affiliates, advisers or representatives shall have any liability whatsoever (based on negligence or otherwise) for any loss howsoever arising from any use of this report or its contents or otherwise arising in connection with this presentation and do not undertake to publicly update or revise any of its opinions or forward-looking statements whether to reflect new information or future events or circumstances otherwise.

Mapping our SDG impact:

In 2021, MTN Group implemented an SDG prioritisation tool to determine the SDGs and SDG Ambition Benchmarks on which we could deliver the biggest impact, while creating business value. It considers three dimensions – impact potential, strategic alignment and risk management potential – for which scores are attributed against defined qualitative criteria. The tool considers various internal and external assessments such as our risk register and industry research. It also incorporates stakeholder views collected through surveys, workshops and materially assessments. The results are then refined to ensure alignment with our strategy.





www.mtn.com

Tel: +27 83 912 3000/+27 83 869 3000/+27 11 912 3000
Innovation Centre
216 14th Avenue
Fairland, 2195
South Africa