



MTN POSITION STATEMENT

Responsible Marketing

Introduction

MTN is committed to maintaining the trusted position and the integrity of our brand. All our communications with the public, including our marketing efforts, embody respect and a sense of responsibility. Our customers are at the centre of everything we do, and we strive to build strong, mutually beneficial relationships with them.

Our reputation and goodwill are vital assets that contribute to the long-term sustainability of MTN. MTN has built its brand with a focus on social responsibility, transparency and creating value for all our stakeholders. MTN understands the need to not only state our belief – that everyone deserves the benefits of a modern connected life – but is prepared to be evaluated against it and to continuously demonstrate that our activities are in line with our mission.

Purpose

- Outline MTN's commitment to accurate, non-offensive, appropriate, consistent and inclusive marketing efforts.
- Embed sufficiently robust processes to avoid any reputational damage.
- Ensure that MTN's marketing efforts, to the extent feasible, are representative and inclusive, aligning to our values of diversity and inclusion, free of violence, discrimination and harmful stereotypes.
- Define the requirements for marketing content across MTN.

MTN's approach

MTN is guided by the following globally defined standards:

- The South African Companies Act or equivalent Act that covers the relevant market in our respective operating geographies
- King IV Code and Report on Corporate Governance on ensuring inclusion of all stakeholders
- Johannesburg Stock Exchange Listings Requirements defining materiality of matters
- Advertising Regulatory Board (ARB) in South Africa or relevant body in geographical markets
- Code of Advertising Practice (South Africa) or relevant code in market
- International Advertising and Marketing Communications Code
- Relevant advertising bodies requirements and approvals

We strive to ensure that our marketing activities are responsible, inoffensive, accurate, consistent and appropriate within all our geographical markets. Our approach to responsible marketing covers all forms of advertising and marketing materials including written, digital, social media, audio, verbal, electronic or any media platform.

All marketing is set out to be legal, decent, honest, truthful and prepared with a sense of respect and responsibility to MTN's consumers and our stakeholders. Our marketing activities are clearly labelled as such. In our marketing activities we avoid technical



language and provide all the necessary information for consumers to understand the terms and conditions of our products and services.

Our marketing is set out to not incite or condone any form of violence or discrimination based on race, ethnicity, colour, age, language, religion, gender, sex, sexual orientation, culture, political or other affiliation, disability, jurisdictional or international status of the country or territory of origin as outlined in MTN's Digital Human Rights policy.

We are committed to creating marketing content which does not reinforce stereotypes and commit to depicting people as empowered actors with progressive and multi-dimensional personalities and refrain from objectifying people.

Interactions with consumers is a central component of MTN marketing efforts. Engaging consumers to share their experiences, stories and content through various forms and across different social media platforms is managed with transparency, authenticity and respect for privacy rights.

Key principles of MTN's Responsible Marketing

Societal, Behavioural & Environmental

- MTN has a zero-tolerance approach to racism, discrimination and stereotyping of any form. All marketing should not appear to condone or incite violence, racism, xenophobia, unlawful or anti-social behaviour.
- We do not permit marketing content that may influence children or exploit their natural trust, naivety, lack of experience or their sense of loyalty.
- Our marketing content does not include messages or images promoting alcohol consumption, smoking, illegal drug use, eating disorders or terrorism in alignment with local and/or international law.
- We do not permit marketing material that contains any content that might reasonably be thought to encourage or condone cruelty or irresponsible behaviour towards animals.
- We are mindful of the environmental implications of marketing activities such as new product development, marketing activation plans, packaging and recycling.

Media, Use of Images / Persons

- MTN will endeavour to avoid broadcasting any advertising campaigns during programmes or on channels which are not aligned with our values
- MTN will endeavour to avoid using platforms that are not verified publishers or legally registered companies. MTN will also avoid the sale of any MTN mobile media to third parties who we deem not to be aligned with our company values.
- We actively manage all usages and personality rights of creative talent utilized in marketing activities and materials. We ensure that no material is used without approval/authorisation/license or where clearances have expired and have not or may not be renewed.
- We ensure images used in marketing communications are not altered to render advertising misleading.



Product & Service Advertising

- We describe our products/services truthfully, accurately and transparently, with appropriate factual information.
- We provide sufficient information for consumers and customers to understand how to use our products and services.
- We ensure marketing is based on adequate support evidence for any claims made.
- We show respect for people who choose not to buy our products and services and ensure there is sufficient information about our products and services for consumers to make informed choices.
- We comply with our licence obligations and applicable regulations and undertake all relevant training required.
- We use technical data, scientific terminology and vocabulary responsibly.
- We ensure the public are fully aware of the nature of any commitment they may enter into as a result of responding to the advertisement.
- We do not describe products as "free" if there is any cost payable by a consumer except for delivery or postage costs.

3rd Parties, Personal Data & Targeted Marketing

- Employees, contractors, consultants and agencies who are involved in MTN marketing activities must at all times comply with the MTN Responsible Marketing Policy, applicable marketing and/or advertising laws.
- We ensure that consumers understand and exercise their rights to regulate 3rd party marketing through mechanisms such as: opt-out option of direct marketing lists, rectify personal data, require their personal data to not be made available to certain third parties or to be deleted, sign-on general direct preference services, as applicable.
- We permit 3rd parties to target our clients with marketing activities only where clients consent or opt-in to receiving such marketing activities within the parameters of the agreed scope of services.
- We ensure that our targeted advertising content is clearly labelled indicating that it comes from MTN directly.
- We will disclose the types, processes and technologies MTN uses to undertake its targeted advertising where possible.
- We ensure individuals are aware of the purpose of collecting personal data and that the usage of personal data is aligned with our policies and all applicable data privacy and protection regulations.

Roles and responsibilities

Our Board through the Group Social, Ethics and Sustainability Committee has oversight of the Group's actions and performance regarding responsible marketing. The Group Management Committee is supported by the Global Brand Council, which monitors the Group's performance regarding responsible marketing. The Group Executive for Marketing is accountable for Responsible Marketing, in line with the MTN Group Responsible Marketing Policy.

**Applicability**

All MTN employees, contractors and the stakeholders such as our affiliates, partners, consultants and service providers are expected to uphold the same standards set out in the policy.

The appointment of marketing agencies or service providers follows rigorous procurement process, all suppliers and partners need to adhere to MTN's supplier code of conduct be able to do business with MTN. Claims, brands, trademarks, marketing material and sponsorships falls under the responsibility of Group Legal & Regulatory and/or Group Marketing.

Accountability and transparent reporting

We are committed to transparency and disclosure regarding responsible marketing at MTN.

Communication and training

The Group Responsible Marketing Policy is shared with all employees of MTN's operating entities, subsidiaries and partners, the Policy is translated into local languages as required. Detailed training is undertaken for various functional, business and operating market areas and levels of management based on the extent of their roles and ability to impact and/or influence MTN's responsible marketing practices.