



MTN POSITION STATEMENT

Digital Human Rights

Introduction

Human rights risks exist throughout MTN's value chain, including those that directly affect the human rights of our customers and stakeholders. We endorse internet access as a human right, collectively with freedom of expression and opinion, the privacy of information and communication and information security. Some of our markets have inherent human rights risks, which we weigh up against the impact of the vital communication services we provide. There is an increased focus on digital human rights and the economic impact associated with every major deliberate internet outage and social media shutdown across the world. Our customer's human rights are addressed in a suite of policies including digital human rights, data privacy and protection, and information security.

Purpose

- The purpose of this policy is to: set out MTN's position, principles and due diligence approach for respecting the digital rights of its customers. We strive to do this in a manner that is cognisant of internationally recognised principles, while attempting to ensure that MTN remains compliant with the terms of its various jurisdictional legal obligations and licence conditions.

MTN's approach

MTN is guided by the following globally defined standards:

- The United Nations Universal Declaration on Human Rights
- The United Nations "Protect, Respect and Remedy" Framework and Guiding Principles
- Africa Union Convention on Cyber Security and Personal Data Protection
- ECOWAS Supplementary Act A/SA.1/01/10 on Personal Data Protection (2010)
- SADC Model Law on Data Protection
- King IV on Corporate Governance

MTN is a member of these key bodies:

- Signatory of the United Nations Global Compact
- GSMA (Global Systems of Mobile Communications)
- Sustainability Network includes Human Rights
- Data Protection and Privacy Working Group
- Centre for Internet Security
- Information Security Forum

Our approach to navigating human rights risks is rooted in our commitment to the principles of the UN Global Compact. The UN Guiding Principles on Human Rights states that, where it is necessary to prioritize 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.



The concept of severity needs to guide our decision making. We have a Digital Human Rights Strategy, Policy and Toolkit in place to guide MTNers in dealing with incidents where our customer's digital human rights are threatened. The severity and complexity of the incidents vary and so does the application of our Digital Human Rights Policy and Toolkit.

Key principles to ensure that any potential human rights violations are identified and addressed effectively:

- MTN respects the rights of all persons and opposes any actions that undermines 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 unlawful 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 that 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 on Human Rights.
- We do not prioritize, block, or delay certain types of traffic, applications, protocols, or content for reasons beyond assuring quality of service and reliability of the network.
- MTN seeks solutions to reduce digital human rights risks and adverse impacts through stakeholder collaboration and engagement.

MTN's Digital Human Rights Due Diligence Framework

- MTN's due diligence framework has been drawn from the UN Guiding Principles for Business and Human Rights framework ("Protect, Respect and Remedy").
- The framework, supported by a toolkit, outlines the steps that all MTN operations should follow before, during and after the occurrence of a digital human rights incident.



- Incidents 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 and opinion, data privacy and information security.
- This framework includes assessing potential incidents and potential impacts of the incidents that may affect customers' rights and enabling our teams to respond to incidents through a clearly defined process which includes identifying remedies for affected customers or stakeholders.
- The same process is followed irrespective of whether it is a non-judicial government demand or court order from local or foreign government jurisdictions and private individuals.
- MTN will attempt to avoid negative human rights impacts by exploring every possible alternative, including pushing back, where it identifies a risk of these rights being infringed.
- MTN's due diligence approach is iterative and ongoing due to the complex and rapid evolution of technology and regulation, considering the macro, social and political climate.

MTN's policies governing digital human rights

Our governance approach to protecting digital human rights is enshrined in the following policies:

- MTN Group Digital Human Rights Policy
- MTN Group Code of Conduct, known as our Conduct Passport

MTN Conduct Passport

- The MTN Conduct Passport emphasises our commitment to our operation and demonstrates the standard of ethics and conduct to be met by individuals employed by MTN.
- The Conduct Passport reiterates to our employees that we are committed to protecting the rights of all people to freely communicate and share information, and to privacy in their use of digital, telephonic and internet-based communications. As such all employees must protect, respect and ensure these rights of all customers using our ICT solutions, where laws and license conditions may not appropriately recognise the rights of our customers.

Roles and responsibilities

- Our Board through the Group Social, Ethics and Sustainability Committee has oversight of the Group's actions and performance regarding digital human rights.
- The Group's Executive Committee is responsible for policy implementation and for identifying, addressing, and remedying human rights risks, driven by the Group Chief Sustainability and Corporate Affairs Function, in line with the MTN Group Digital Human Policy.

Applicability and transparent reporting



- 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 ([Link to Supplier Code of Conduct on the website](#)).
- We are committed to transparency and disclosure regarding responsible marketing at MTN.

Communication and training

- Detailed training is provided to employees and partners based on the extent of their roles and ability to impact and/or influence these rights.