



MTN Group Limited

Global Reporting Initiative report for the year ended 31 December 2020

Leading digital solutions for Africa's progress



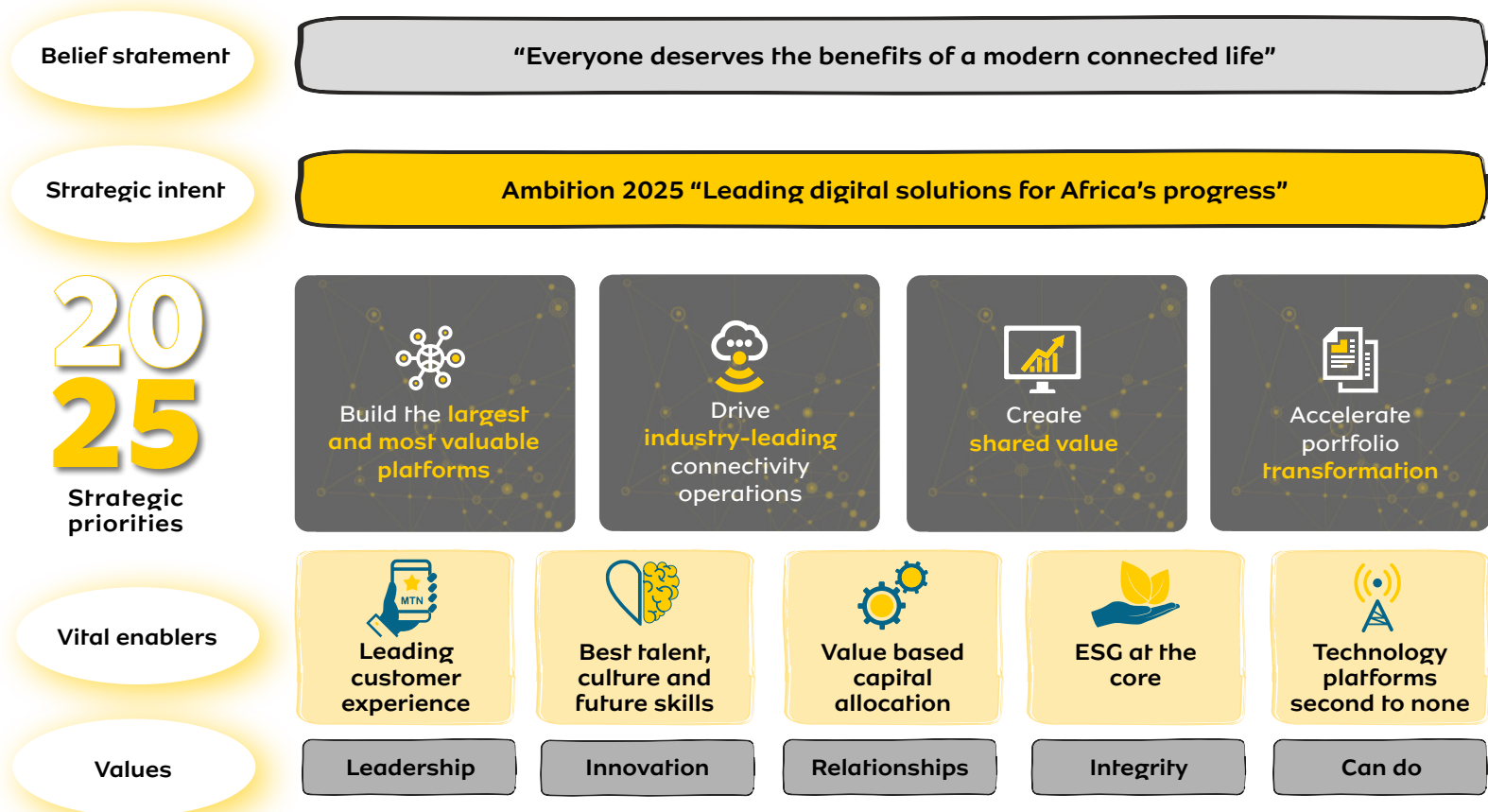
Who we are



MTN is an emerging market mobile operator at the forefront of technological and digital changes. 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 and enterprise services to more than 280m customers in 21 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 team of people to now offer services to communities across Africa and the Middle East. MTN Group Limited is a publicly owned entity whose shares are traded on the JSE. At end-2020 our market capitalisation was R108bn.

Our revised strategy, Ambition 2025, is anchored in building the largest and most valuable platform business with a clear focus on Africa. This will rest on a scale connectivity and infrastructure business, making use of both mobile and fixed access networks across the consumer, enterprise and wholesale segments. The implementation of this growth strategy will be accelerated through selective partnerships and leveraging MTN's brand as the most trusted and valued in Africa, while it will be supported and funded through enhanced cost and capex efficiencies. The execution of Ambition 2025 is embodied in four clear strategic priorities. We have identified five vital enablers to assist in operationalising our strategy.



Our sustainability approach

Sustainability is at the core of our business strategy as we strive to create shared value for our stakeholders. We realise the importance of driving economic value sharing through responsible environmental, social and governance practices as outlined within our sustainability framework.

Eco-responsibility

One of the most significant ways business is shaping the world we live in is through energy use and its contribution to climate change. Scientists and policymakers largely agree that Africa's population is more vulnerable to the effects of climate change than many other regions globally.

We believe the growth and success of any business should not come at the expense of the future of our planet. As a result, we take responsibility for our environmental impacts and manage the aspects within our control throughout our geographic footprint in Africa and the Middle East.

Sustainable societies

Building a digital platform to drive digital transformation across Africa and the Middle East is pivotal to serving societies' interests. The digital revolution is a powerful agent for transforming society for the better; conversely, a lack of access to the digital world creates wider social and economic disparities.

As an emerging market operator, addressing social challenges is an inherent part of our business. MTN can flourish only when the communities and ecosystems in which it operates are healthy.

Leveraging the size, resources and capabilities of our business, we enable socio-economic development in the communities within which we operate. This is underpinned by our core belief that everyone deserves the benefits of a modern, connected life.

Sound governance

A strong governance framework fosters sustainability, establishes sustainable values and embeds a value-driven organisational culture. Good governance promotes accountability and transparency, underpinning efficient management of human, natural, economic and financial resources. Sound governance includes ethical conduct, robust risk management and regulatory compliance, which is fundamental in our shared-values approach and in ensuring our long-term sustainability.

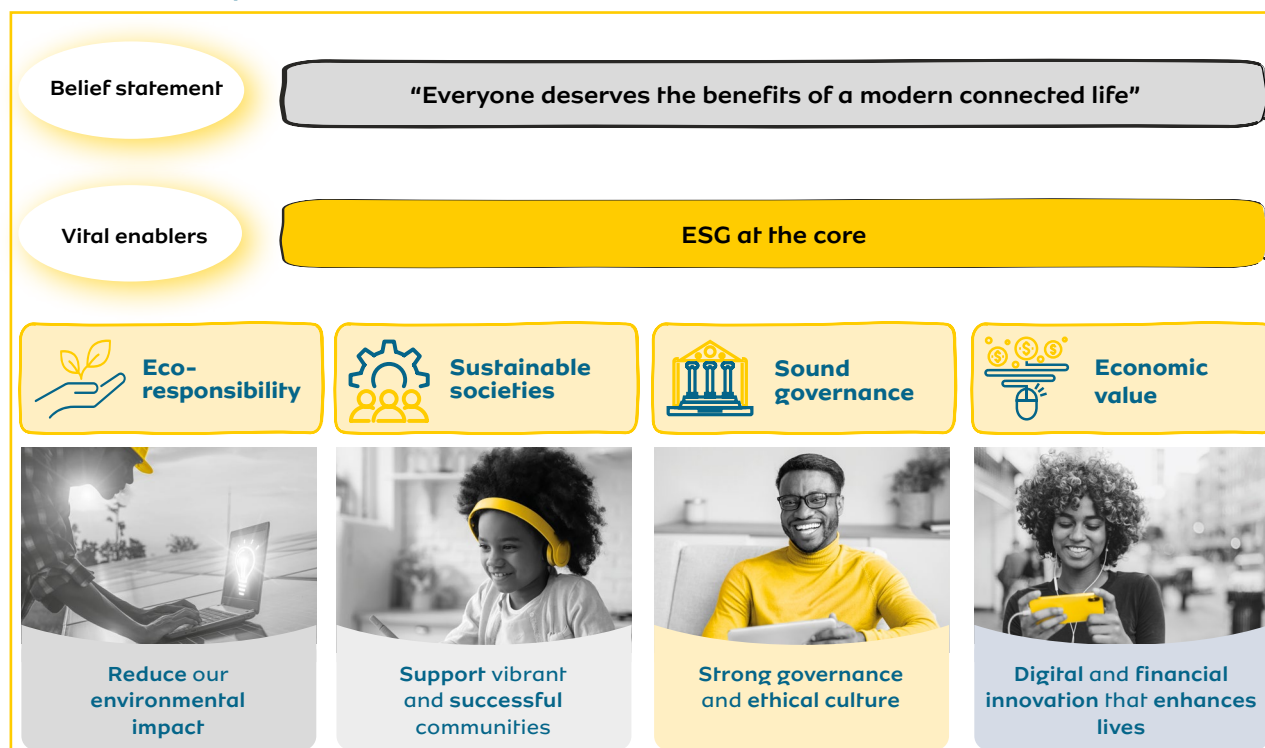
Our governance practices assist us in preventing and mitigating risks in our operating environments, as well as building trust with our stakeholders.

Economic value

Mobile technologies and services contributed as much as 4,7% to gross domestic product (GDP) globally in 2019. This significant figure is estimated to increase to 4,9% of GDP by 2024, as countries continue to benefit from the related improvements in productivity and efficiency¹.

MTN's success is closely linked to inclusive socio-economic growth and development in Africa. We provide the foundation for a modern connected life through our extensive and resilient networks and a wide range of products and services tailored to emerging market needs. As one of Africa's largest digital operators, MTN plays a pivotal role in addressing considerable gaps in access to connectivity by driving mobile and internet adoption.

Our sustainability framework



¹ GSMA – The mobile economy 2020.



Global Reporting Initiative Standards

MTN's disclosures are guided by the Global Reporting Initiative's (GRI) Standards ('Core' option). This document serves as MTN's 2020 GRI Content Index and includes references to where information for each applicable GRI disclosure can be found across MTN's suite of reporting.

The following key documents that are referenced within this Content Index can be found on the MTN website:

2020 Integrated Annual Report (IAR): <https://www.mtn.com/investors/financial-reporting/integrated-reports/>

2020 Annual Financial Statement (AFS): <https://www.mtn.com/investors/financial-reporting/integrated-reports/>

2020 Sustainability Report (SR): <https://www.mtn.com/sustainability/reports/>

2020 Carbon Disclosure Project (CDP): <https://www.mtn.com/sustainability/reports/>

2020 Transparency Report: <https://www.mtn.com/sustainability/reports/>

MTN Position Statements: <https://www.mtn.com/sustainability/our-positions/>

Indicator	Disclosure	Reference and information	Page (s)
GRI 102: General Disclosures			
102-1	Name of the organisation	2020 IAR: Front cover	Front cover
102-2	Activities, brands, products, and services	MTN Website: What we do	
102-3	Location of headquarters	2020 IAR: Administration	100
102-4	Location of operations	2020 IAR: Where we operate and how we performed	3
102-5	Ownership and legal form	2020 IAR: Who we are	2
102-6	Markets served	2020 IAR: Where we operate and how we performed	3
102-7	Scale of the organisation	2020 IAR: Who we are; Where we operate and how we performed 2020 SR: Annual sustainability statements	2 and 3 62
102-8	Information on employees and other workers	2020 SR: Annual sustainability statements	62
102-9	Supply chain	2020 SR: Supporting a responsible supply chain	33 to 36
102-10	Significant changes to the organization and its supply chain	2020 SR: Supporting a responsible supply chain	33 to 36
102-11	Precautionary principle or approach	2020 SR: Supporting a responsible supply chain	33 to 36
102-12	External initiatives	2020 SR: About this report	1
102-13	Membership of associations	See MTN Position Statements for association memberships per topic area	
102-14	Statement from senior decision-maker	2020 SR: Group President and CEO on sustainability	4



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Indicator	Disclosure	Reference and information	Page (s)
102-15	Key impacts, risks, and opportunities	2020 IAR: Navigating through and responding to COVID-19; Material matters impacting value creation 2020 SR: Addressing energy and climate change; Managing risks.	15, 21 to 25 15 to 19
102-16	Values, principles, standards, and norms of behaviour	2020 SR: Who we are; Accelerating ethical practices; Supporting a responsible supply chain	2, 41 and 42, 26 and 27, 33 to 36
102-17	Mechanisms for advice and concerns about ethics	2020 SR: Who we are; Accelerating ethical practices; Supporting a responsible supply chain	2, 41 and 42, 26 and 27, 33 to 36
102-18	Governance structure	2020 IAR: Governance in action	52
102-19	Delegating authority	2020 IAR: Governance in action; Social and Ethics Committee Chair's review 2020 SR: Our sustainability approach	52, 26 1
102-20	Executive-level responsibility for economic, environmental, and social topics	2020 SR: About this report	1
102-21	Consulting stakeholders on economic, environmental, and social topics	2020 IAR: Relationships on which we rely to create value 2020 SR: Our stakeholders	27 to 30 9 to 11
102-22	Composition of the highest governance body and its committees	2020 IAR: Governance in action	52
102-23	Chair of the highest governance body	2020 IAR: Governance in action	52 and 53
102-24	Nominating and selecting the highest governance body	2020 IAR: Governance in action	51 to 58
102-25	Conflicts of interest	2020 IAR: Governance in action	58
102-26	Role of highest governance body in setting purpose, values, and strategy	2020 IAR: Governance in action	51 to 58
102-27	Collective knowledge of highest governance body	2020 IAR: Governance in action – focus on ESG	54, 57
102-28	Evaluating the highest governance body's performance	2020 IAR: Governance in action	55
102-29	Identifying and managing economic, environmental, and social impacts	2020 IAR: Governance in action; Social and Ethics Committee Chair's review 2020 SR: Our sustainability approach	51 to 58, 26 2 to 12
102-30	Effectiveness of risk management processes	2020 IAR: Top risks to value creation 2020 SR: Managing risks	33 to 38 43 and 44
102-31	Review of economic, environmental, and social topics	2020 IAR: Governance in action; Social and Ethics Committee Chair's review 2020 SR: Our sustainability approach	53, 26 1
102-32	Highest governance body's role in sustainability reporting	2020 IAR: Governance in action; Social and Ethics Committee Chair's review; Our market context 2020 SR: Our sustainability approach	55 to 57 26, 8, 1
102-33	Communicating critical concerns	2020 SR: Accelerating ethical practices	41 and 42

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Indicator	Disclosure	Reference and information	Page (s)
102-34	Nature and total number of critical concerns	2020 SR: Accelerating ethical practices 2020 IR: Social and Ethics Committee Chair's review	41 and 42 26
102-35	Remuneration policies	2020 IAR: Remuneration report	70 to 83
102-36	Process for determining remuneration	2020 IAR: Remuneration report	64 to 95
102-37	Stakeholders' involvement in remuneration	2020 IAR: Remuneration report	64 to 95
102-40	List of stakeholder groups	2020 SR: Our stakeholders 2020 IAR: Relationships on which we rely to create value	10 and 11 28 to 30
102-41	Collective bargaining agreements	2020 SR: ESG indicators performance	63
102-42	Identifying and selecting stakeholders	2020 SR: Our stakeholders 2020 IR: Relationships on which we rely to create value	9 27
102-43	Approach to stakeholder engagement	2020 SR: Our stakeholders 2020 IR: Relationships on which we rely to create value	9 27 to 30
102-44	Key topics and concerns raised	2020 SR: Our stakeholders 2020 IR: Relationships on which we rely to create value	9 to 11 27 to 30
102-45	Entities included in the consolidated financial statements	2020 AFS	110
102-46	Defining report content and topic Boundaries	2020 SR: About this report	1
102-47	List of material topics	2020 SR: Our materiality process	12
102-48	Restatements of information	2020 IAR: About this report	1
102-49	Changes in reporting	2020 IAR: About this report	1
102-50	Reporting period	2020 SR: About this report	1
102-51	Date of most recent report	2020 IAR: About this report	1
102-52	Reporting cycle	2020 SR: About this report	1
102-53	Contact point for questions regarding the report	2020 IAR: Administration	100
102-54	Claims of reporting in accordance with the GRI Standards	2020 SR: About this report	1
102-55	GRI content index	2020 GRI Content Index (this document)	
102-56	External assurance	2020 IAR: About this report	1
103-1	Explanation of the material topic and its Boundary	2020 SR: Our materiality process	12
103-2	The management approach and its components	2020 SR: Our sustainability approach	1 to 12
103-3	Evaluation of the management approach	2020 SR: About this report	1

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GRI 201: Economic Performance			
103-1	Explanation of the material topic and its boundary	2020 IAR: Material matters impacting value creation 2020 SR: About this report and Our sustainability approach	21 1 to 12
103-2	The management approach and its components	2020 IAR: Governance in action	51 to 58
103-3	Evaluation of the management approach	2020 IAR: Strategic and financial review	39 to 48
201-1	Direct economic value generated and distributed	2020 IAR: Where we operate and how we performed; How we create value using the six capitals	3, 18 to 20
GRI 203: Indirect Economic Impacts			
103-1	Explanation of the material topic and its boundary	2020 SR: Economic value	46 to 60
103-2	The management approach and its components	2020 SR: Our sustainability approach and Economic value	46 to 60
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach and Economic value	46 to 60
203-1	Infrastructure investments and services supported	2020 SR: Economic value	46 to 60
203-2	Significant indirect economic impacts	2020 SR: Economic value	46 to 60
GRI 204: Procurement Practices			
103-1	Explanation of the material topic and its boundary	2020 SR: Supporting a responsible supply chain	33 to 36
103-2	The management approach and its components	2020 SR: Supporting a responsible supply chain	33 to 36
103-3	Evaluation of the management approach	2020 SR: Supporting a responsible supply chain	33 to 36
204-1	Proportion of spending on local suppliers	2020 SR: Supporting a responsible supply chain	33 to 36

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GRI 205: Anti-corruption			
103-1	Explanation of the material topic and its boundary	2020 SR: Accelerating ethical practices MTN Position Statements related to ethical practices	41 and 42
103-2	The management approach and its components	2020 SR: Accelerating ethical practices MTN Position Statements related to ethical practices	41 and 42
103-3	Evaluation of the management approach	2020 SR: Accelerating ethical practices MTN Position Statements related to ethical practices	41 and 42
205-1	Operations assessed for risks related to corruption	2020 SR: Accelerating ethical practices MTN Position Statements related to ethical practices	41 and 42
205-2	Communication and training about anti-corruption policies and procedures	2020 SR: Accelerating ethical practices MTN Position Statements related to ethical practices	41 and 42
GRI 206: Anti-competitive Behaviour			
103-1	Explanation of the material topic and its boundary	2020 SR: Accelerating ethical practices MTN Position Statements related to ethical practices	41 and 42
103-2	The management approach and its components	2020 SR: Accelerating ethical practices MTN Position Statements related to ethical practices	41 and 42
103-3	Evaluation of the management approach	2020 SR: Accelerating ethical practices MTN Position Statements related to ethical practices	41 and 42
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	2020 SR: Accelerating ethical practices MTN Position Statements related to ethical practices	41 and 42
GRI 302: Energy			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process; Addressing energy and climate change 2020 CDP Report	5 and 6, 12 to 19
103-2	The management approach and its components	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process; Addressing energy and climate change 2020 CDP Report	5 and 6, 12 to 19
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process; Addressing energy and climate change 2020 CDP Report	5 and 6, 12 to 19
302-1	Energy consumption within the organisation	2020 SR: Addressing energy and climate change; ESG indicators performance 2020 CDP Report	5 and 6, 12 to 19, 62

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302-2	Energy consumption outside of the organisation	2020 SR: Addressing energy and climate change; ESG indicators performance 2020 CDP Report	5 and 6, 12 to 19, 62
302-3	Energy intensity	2020 SR: Addressing energy and climate change; ESG indicators performance 2020 CDP Report	5 and 6, 12 to 19, 62
302-4	Reduction of energy consumption	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process, Addressing energy and climate change; ESG indicators performance 2020 CDP Report	5 and 6, 12 to 19, 62
GRI 305: Emissions			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process; Addressing energy and climate change 2020 CDP Report	5 and 6, 12 to 19
103-2	The management approach and its components	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process; Addressing energy and climate change 2020 CDP Report	5 and 6, 12 to 19
103-3	Evaluation of the management approach	2020 SR: Addressing energy and climate change; ESG indicators performance 2020 CDP Report	5 and 6, 12 to 19, 62
305-1	Direct (Scope 1) GHG emissions	2020 SR: Addressing energy and climate change; ESG indicators performance 2020 CDP Report	5 and 6, 12 to 19, 62
305-2	Energy indirect (Scope 2) GHG emissions	2020 SR: Addressing energy and climate change; ESG indicators performance 2020 CDP Report	5 and 6, 12 to 19, 62
305-3	Other indirect (Scope 3) GHG emissions	2020 SR: Addressing energy and climate change; ESG indicators performance 2020 CDP Report	5 and 6, 12 to 19, 62
305-4	GHG emissions intensity	2020 SR: Addressing energy and climate change; ESG indicators performance 2020 CDP Report	5 and 6, 12 to 19, 62
305-5	Reduction of GHG emissions	2020 SR: Addressing energy and climate change; ESG indicators performance 2020 CDP Report	5 and 6, 12 to 19, 62
GRI 306: Effluents and Waste			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process	5 and 6, 12 to 14, 20 and 21
103-2	The management approach and its components	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process	5 and 6, 12 to 14, 20 and 21
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process	5 and 6, 12 to 14, 20 and 21

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306-1	Waste generation and significant waste-related impacts	2020 SR: Greening our waste; Redefining waste management	20
306-2	Management of significant waste-related impacts	2020 SR: Greening our waste; Redefining waste management; ESG indicators performance	20,62
GRI 307: Environmental Compliance			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process	5 and 6, 12 to 24
103-2	The management approach and its components	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process	5 and 6, 12 to 24
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Eco-responsibility; Materiality process	5 and 6, 12 to 24
307-1	Non-compliance with environmental laws and regulations	2020 SR: Eco-responsibility	13 to 24
GRI 401: Employment			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-2	The management approach and its components	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
401-1	New employee hires and employee turnover	2020 SR: ESG indicators performance: Future-fit workplace	63
GRI 402: Labour/Management Relations			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-2	The management approach and its components	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
402-1	Minimum notice periods regarding operational changes	2020: Position Statement on labour practices	

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GRI 403: Occupational Health and Safety			
103-1	Explanation of the material topic and its boundary	2020 IAR: Material matters impacting value creation (COVID-19)	22
103-2	The management approach and its components	2020 SR: Our COVID-19 Y'ello Hope response; Enhancing employee health and safety 2020: Position Statement on labour practices	7 to 8, 31 and 32
103-3	Evaluation of the management approach	2020 SR: Our COVID-19 Y'ello Hope response; Enhancing employee health and safety	7 to 8, 31 and 32
403-1	Occupational health and safety management system	2020 SR: Our COVID-19 Y'ello Hope response; Enhancing employee health and safety	7 to 8, 31 and 32
GRI 404: Training and Education			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-2	The management approach and its components	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
404-1	Average hours of training per year per employee	2020 SR: ESG indicators performance	63
404-2	Programmes for upgrading employee skills and transition assistance programmes	2020 SR: Sustainable societies	25 to 39
GRI 405: Diversity and Equal Opportunity			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-2	The management approach and its components	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
405-1	Diversity of governance bodies and employees	2020 IAR: Governance in action 2020 SR: Driving a future-fit workforce; ESG indicators performance	51 to 58 63

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GRI 406: Non-discrimination			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-2	The management approach and its components	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
406-1	Incidents of discrimination and corrective actions taken	2020 SR: Eradicating harassment and discrimination in the workplace	32
GRI 407: Freedom of Association and Collective Bargaining			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-2	The management approach and its components	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	2020 SR: ESG indicators performance	63
GRI 412: Human Rights Assessment			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-2	The management approach and its components	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
412-2	Employee training on human rights policies or procedures	2020: Position Statement on digital human rights	
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	2020 SR: Sustainable societies	25 to 27

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GRI 413: Local Communities			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-2	The management approach and its components	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Sustainable societies; Materiality process	5 and 6, 12, 25 to 39
GRI 416: Customer Health and Safety			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Eco-responsibility; Sustainable societies; Materiality process; Protecting against electromagnetic fields MTN Group's position on mobiles and health	5 and 6, 23 to 39
103-2	The management approach and its components	2020 SR: Our sustainability approach; Eco-responsibility; Sustainable societies; Materiality process; Protecting against electromagnetic fields MTN Group's position on mobiles and health	5 and 6, 23 to 39
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Eco-responsibility; Sustainable societies; Materiality process; Protecting against electromagnetic fields MTN Group's position on mobiles and health	5 and 6, 23 to 39
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	2020 SR: Eco-responsibility	23 and 24
GRI 418: Customer Privacy			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Sustainable Societies; Materiality process 2020 Transparency Report	5 and 6, 12, 25 to 39
103-2	The management approach and its components	2020 SR: Our sustainability approach; Sustainable Societies; Materiality process 2020 Transparency Report	5 and 6, 12, 25 to 39
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Sustainable Societies; Materiality process 2020 Transparency Report	5 and 6, 12, 25 to 39
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	2020 SR: Respecting human rights 2020 Transparency Report	25 to 27

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GRI 419: Socio-economic Compliance			
103-1	Explanation of the material topic and its boundary	2020 SR: Our sustainability approach; Sound governance; Materiality process	5 and 6, 12, 41 and 45
103-2	The management approach and its components	2020 SR: Our sustainability approach; Sound governance; Materiality process	5 and 6, 12, 41 and 45
103-3	Evaluation of the management approach	2020 SR: Our sustainability approach; Sound governance; Materiality process	5 and 6, 12, 41 and 45
419-1	Non-compliance with laws and regulations in the social and economic area	2020 SR: Sound Governance	41, 45