

6.2 2012 United Nations GRI Report

We use the United Nations (UN) Global Reporting Initiative G3 Guidelines and Telecommunications Sector Supplement in our integrated sustainability reporting processes. (At the time this report was compiled, the G4 indicators had not been released.)

We have assessed our GRI application to a Level C (down from Level B reported for financial year 2011). The reason for the drop in the assessment level is as a result of the completeness and nature of information/ disclosure required in terms of the Group's management approaches. We are working to improve this in future years' reports.

IR = MTN Group Limited Integrated Report for the year ended 31 December 2012.

SR = MTN Group Limited Sustainability Report for the year ended 31 December 2012.

GRI indicator		MTN's response (document, section, page number)
Strategy and analysis		
1.1	CEO statement	<ul style="list-style-type: none"> IR: Group president and CEO's report pages 32 to 35 SR: Group president and CEO's statement pages 4 to 7
1.2	Impacts, risks and opportunities: on stakeholders and financial performance)	<ul style="list-style-type: none"> IR: Risk and opportunities pages 10 to 13 SR: Eco-responsibility page 52
Organisational profile		
2.1	Name of reporting organisation	<ul style="list-style-type: none"> MTN Group Limited
2.2	Products, services	<ul style="list-style-type: none"> IR: MTN's core offering page 17 www.mtn.com/offering
2.3	Operating structure	<ul style="list-style-type: none"> IR: MTN Group structure pages 26 to 29, governance structure page 68
2.4	Location of headquarters	Phase 2 Building; Innovation Centre; 216 14th Avenue; Fairland, South Africa
2.5	Geographic scope/map of operations	<ul style="list-style-type: none"> IR: MTN Group profile; footprint pages 4 and 5
2.6	Nature of ownership and legal form	<ul style="list-style-type: none"> IR: MTN Group profile; footprint pages 4 and 5; pages 48 to 65 for the top nine material operations
2.7	Profile of customer base	<ul style="list-style-type: none"> IR: Core offerings page 17; www.mtn.com/offering
2.8	Scale of operations	<ul style="list-style-type: none"> IR: MTN Group footprint pages 4 and 5 SR: MTN Group footprint page 60 and 61
2.9	Changes occurring within the reporting period	<ul style="list-style-type: none"> IR: MTN Group profile; footprint pages 4 and 5
2.10	Awards received	<ul style="list-style-type: none"> IR: MTN Group profile; footprint pages 4 and 5 pages 48 to 65 for the top nine material operations Various on www.mtn.com
Report parameters		
Report profile		
3.1	Reporting period	1 January 2012 ending on 31 December 2012
3.2	Date of most recent report	April 2012
3.3	Reporting cycle: annual etc)	Annual
3.4	Contact point for queries	<ul style="list-style-type: none"> IR: Administration page 238 SR: Where to find more information page 51

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GRI indicator		MTN's response (document, section, page number)
Report scope and boundary		
3.5	How was report content defined	<ul style="list-style-type: none"> • IR: MTN Group about this report • SR: Determining material issues pages 50 to 51
3.6	Report boundaries	<ul style="list-style-type: none"> • IR: MTN Group about this report • SR: Scope, boundaries and integration page 50
3.7	Limitations on scope	<ul style="list-style-type: none"> • IR: MTN Group about this report • SR: Scope, boundaries and integration page 50
3.8	Reporting of joint ventures, subsidiaries etc	<ul style="list-style-type: none"> • IR: MTN Group Annual Financial Statements, Annexure 1 page 212 • SR: Scope, boundaries and integration page 50
3.9	Data measurement	<ul style="list-style-type: none"> • SR: Annual sustainability statement pages 31 and 32
3.10	Restatements from previous report	<ul style="list-style-type: none"> • Not applicable/no restatements from previous report
3.11	Changes from previous report	<ul style="list-style-type: none"> • Not applicable/no restatements from previous report
3.12	GRI table location	<ul style="list-style-type: none"> • SR: GRI pages 33 to 47
Assurance		
3.13	Policy on independent assurance	<ul style="list-style-type: none"> • IR: Assurance statement; combined assurance page 113 • SR: Annual sustainability statement pages 52 to 55
Governance		
4.1	Company's governance structure: including major committees	<ul style="list-style-type: none"> • IR: Group board of directors pages 22 to 29
4.2	Is the chairman also an executive officer?	No
4.3	Board profile: number, gender, executive versus non-executive	<ul style="list-style-type: none"> • IR: Group board of directors pages 22 to 25
4.4	How do stakeholders provide recommendations to the board?	<ul style="list-style-type: none"> • IR: Interacting with stakeholders page 14
4.5	Link between remuneration and leadership performance	<ul style="list-style-type: none"> • IR: Our people and remuneration report pages 76 to 95
4.6	Managing conflicts of interest	<ul style="list-style-type: none"> • IR: Corporate governance highlights page 71; page 75
4.7	Process for determining leadership qualifications	<ul style="list-style-type: none"> • The board and Exco members' skills and qualifications are assessed during their recruitment process. Assessment of board skills is done on an ongoing basis during board evaluation
4.8	Internally developed mission/value statements, principles or codes related to sustainability	<ul style="list-style-type: none"> • IR: value added statement page 16, key governance enhancements and compliance page 69 • SR: Annual sustainability statement page 30 • www.mtn.com/Sustainability/More_on_sustainability/MTN_sustainability_model.aspx • SR: MTN Group social and ethics statement page 27

GRI indicator		MTN's response (document, section, page number)
4.9	Board oversight of sustainability	<ul style="list-style-type: none"> IR: Group risk management, compliance and corporate governance committee (governance highlights) page 78; social and ethics committee pages 98 to 108 www.mtn.com/Sustainability/More_on_sustainability/governance.aspx
4.10	Processes for evaluating the board's sustainability performance	<ul style="list-style-type: none"> IR: Governance highlights, Group secretary pages 71 and 72
Commitments to external initiatives		
4.11	Use of the precautionary principle	<ul style="list-style-type: none"> SR: Eco-responsibility: network environmental impacts page 21
4.12	External charters or principles endorsed: eg EEA, GC	<ul style="list-style-type: none"> SR: Key sustainability standards of reference page 30
4.13	Strategic memberships endorsed: eg EEA, GC	<ul style="list-style-type: none"> UN Global Compact National Business Institute (South Africa)
Stakeholder engagement		
4.14	List of stakeholder groups	<ul style="list-style-type: none"> IR: Our engagement with stakeholders page 14
4.15	How are stakeholders identified?	<ul style="list-style-type: none"> IR: Our engagement with stakeholders page 14
4.16	Ongoing mechanisms for stakeholder engagement: who, how, what outcome	<ul style="list-style-type: none"> IR: Our engagement with stakeholders page 14
4.17	Stakeholder concerns and how the organisation responded	<ul style="list-style-type: none"> IR: Our engagement with stakeholders page 14
Economic		
Disclosure on management approach		
EC: MD	Management approach: economic performance, market presence and indirect economic aspects	<ul style="list-style-type: none"> We operate at the heart of nations bursting with innovation, creativity and new ideas. We will continue to champion positive change. We are not first world or third world – we believe we are operating in the new world. Working with integrity, we value our relationships with the communities in which we work, our customers and employees, our shareholders and the media, governments and regulators as well as supplies and business and industry partners. We recognise the importance of these stakeholders, among others, in the sustainability of our business IR: Group president and CEO statement pages 32 to 35
Economic performance		
EC1	Economic value added	<ul style="list-style-type: none"> IR: Our value added statement page 16 SR: Annual sustainability statement pages 31 and 32
EC2	Climate change related financial implications, risks and opportunities	<ul style="list-style-type: none"> IR: Our top risks and mitigation pages 10 to 13; our environmental performance page 98 SR: Eco-responsibility pages 20 and 21

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GRI indicator		MTN's response (document, section, page number)
Economic performance		
EC4	Significant financial assistance received from government	<ul style="list-style-type: none"> MTN Group and its operations; excluding MTN South Africa, do not receive financial assistance from government. MTN South Africa contributes 1% of its annual payroll to the National Skills Development Levy. A 50% rebate on this contribution is received, and the Company uses this to further training and skills development programmes
IO1	Capital investment in telecommunication network infrastructure broken down by country/region	<ul style="list-style-type: none"> IR: Group CFO report pages 36 to 39; key statistics; five-year review; operational and financial performance review pages 4 and 5; pages 48 to 65
IO2	Net costs for MTN under the universal service obligation when extending service to geographic locations and low-income groups, which are not profitable	<ul style="list-style-type: none"> The MTN Group has not separately calculated or ring-fenced the net costs of extending service to geographic locations and low-income communities which are not profitable, due to the nature of the business' operations in emerging markets across Africa and the Middle East, where low-income and geographic spread of markets are a feature of some of these markets
Market presence		
EC5	Standard entry-level wage compared to local minimum wage	<ul style="list-style-type: none"> The MTN Group pays entry-level wages equal to or above local minimum wages in each country in which the Company operates
EC6	Policy, practices, and proportion of spending on locally based suppliers	<ul style="list-style-type: none"> IR: MTN strategy, vision and mission pages 6 and 7
EC7	Procedures for local hiring: including senior management	<ul style="list-style-type: none"> The MTN Group hires locally as far as possible. A significant majority of employees, including management, at each of the Company's operations are citizens of the respective countries where the Company operates
Access to telecommunications products and services: bridging the digital divide		
PA1	Policies and practices to enable the deployment of telecommunications infrastructure and access to telecommunications products and services in remote and low population density areas	<ul style="list-style-type: none"> IR: Our strategy, vision and mission pages 6 and 7 SR: Helping close the digital divide pages 14 to 16
PA2	Policies and practices and business model applied to overcome barriers for access and use of telecommunication products and services, including: language, culture, illiteracy and lack of education, low income, disabilities and age	<ul style="list-style-type: none"> SR: Helping close the digital divide pages 14 to 16

GRI indicator		MTN's response (document, section, page number)
Access to telecommunications products and services: bridging the digital divide <i>continued</i>		
PA3	Policies and practices to ensure availability and reliability of telecommunications products and services and quantify, where possible, for specified time periods and locations of down time	<ul style="list-style-type: none"> • IR: Achievements, challenges, opportunities page 15 • Each operation monitors the reliability of its network using at least three or more indicators. These include call setup success rate, dropped call rate, and network availability. Some operations performance were assured for 2012. • SR: 2012 sustainability value added report page 31 and assurance statements page 52 to 55
PA4	The level of availability of telecommunications products and services in areas where MTN operates	<ul style="list-style-type: none"> • IR: Operational and financial performance review (top five) pages 48 to 65
PA5	Number and types of telecommunication products and services provided to and used by low- and no-income sectors of the population, with definitions of these designated groups	<ul style="list-style-type: none"> • SR: Helping close the digital divide pages 14 to 16
PA6	Programmes to provide and maintain telecommunication products and services in emergency situations and for disaster relief	<ul style="list-style-type: none"> • SR: Helping close the digital divide pages 14 to 16
Indirect economic impacts		
EC8	Positive public impact of pro bono/donated infrastructure and services	<ul style="list-style-type: none"> • The MTN Group is assessing how our business intelligence reporting solution – MTN Market Performance Report (MPR) – can incorporate some of the required measures to assess our impact in each market where the MPR is run. The Group's Foundations strategy is also under review, and monitoring and evaluation are being planned as part of the new strategic approach
EC9	Significant indirect economic impacts: including extent	<p>The MTN Group has not conducted a socio-economic impact assessment. See comments for EC8. However, investment in indirect economic impacts is located at:</p> <ul style="list-style-type: none"> • IR: Our footprint page 4; Value added statement page 16; and • SR: Annual sustainability statement pages 31 and 32

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GRI indicator		MTN's response (document, section, page number)
Environmental		
Disclosure on management approach		
EN: MD	Management approach: energy, water, materials, biodiversity, emissions, effluents and waste	<p>Our customers live in emerging countries that are resource-rich, but globally are most vulnerable to the effects of climate change. For this reason, we take our responsibility to address our environmental impact seriously. The three most material areas of impact where our efforts can have a less harmful impact on the environment are managing and reducing our greenhouse gas emissions, ensuring our network implementation is environmentally sound, and responding to the global proliferation of electronic and electrical waste. We also know that we can use ICT solutions to help other companies reduce their environmental impact</p> <ul style="list-style-type: none"> • IR: Material issues page 9; top risks and mitigation page 13; environmental report page 99 • SR: Eco-responsibility pages 20 and 21
Materials		
EN1	Materials used: weight/volume	The most material resources used are electronic and electrical equipment. As these are procured from Own Equipment Manufacturers, the MTN Group does not measure the weight and volume
EN2	Percentage of recycled materials used	Due of the nature of products and services offered, the MTN Group does not consider this indicator to be material for its operations. The Group is however, looking into e-waste recycling and re-use SR: e-Waste management page 21
Energy		
EN3	Direct energy use: by primary source	<ul style="list-style-type: none"> • IR: Review of our performance; our environmental performance page 1; page 99 • SR: Energy, carbon and climate pages 20 and 21; annual sustainability statement pages 31 and 32 • www.cdproject.net (MTN reports)
EN4	Indirect energy use: by primary source	<ul style="list-style-type: none"> • IR: Review of our performance; our environmental performance page 1; page 99 • SR: Energy, carbon and climate pages 20 and 21; annual sustainability statement pages 31 and 32 • www.cdproject.net (MTN reports)
EN5	Energy saved due to efficiencies	<ul style="list-style-type: none"> • IR: Review of our performance; our environmental performance page 1; page 99 • SR: Energy, carbon and climate pages 20 and 21; annual sustainability statement pages 31 and 32 • www.cdproject.net (MTN reports)

GRI indicator		MTN's response (document, section, page number)
Energy continued		
EN6	Energy efficiency/renewable energy initiatives	<ul style="list-style-type: none"> • IR: Review of our performance; our environmental performance page 1; page 99 • SR: Energy, carbon and climate pages 20 and 21; annual sustainability statement pages 31 and 32 • www.cdproject.net (MTN reports)
EN7	Initiatives to reduce indirect energy consumption	<ul style="list-style-type: none"> • IR: Review of our performance; our environmental performance page 1; page 99 • SR: Energy, carbon and climate pages 20 and 21; annual sustainability statement pages 31 and 32 • www.cdproject.net (MTN reports)
Water		
EN8	Total water withdrawal by source	Due to the nature of MTN's business, this indicator is not material. However, as part of the implementation of ISO 14001 in operations and LEED certification in MTN South Africa responsible water management and use is addressed
EN9	Water sources significantly affected by withdrawal of water	Due to the nature of MTN's business, this indicator is not material
EN10	Percentage and total water volume of water recycled and re-used	Due to the nature of MTN's business, this indicator is not material. However, as part of the implementation of ISO 14001 in operations and LEED certification in MTN South Africa responsible water management and use is addressed
Biodiversity		
EN11	Location and size of land owned, leased or managed in biodiversity-rich habitats	The MTN Group does not currently report against this indicator
EN12	Impacts of operations on areas of high biodiversity value	<ul style="list-style-type: none"> • SR: Eco-responsibility – responsible network management page 21
EN13	Habitats protected or restored	<ul style="list-style-type: none"> • Due to the nature of MTN's business, this indicator is not material
EN14	How impacts on biodiversity are being managed	<ul style="list-style-type: none"> • SR: Eco-responsibility – responsible network management page 21
EN15	Number of conservation list species affected by operations	<p>The MTN Group does not currently report against this indicator:</p> <ul style="list-style-type: none"> • SR: Eco-responsibility – responsible network management page 21
Emissions, effluent and waste		
EN16	Total direct and indirect greenhouse gas emissions by weight	<ul style="list-style-type: none"> • IR: An overview of our performance page 1; our environmental performance page 99 • SR: Eco-responsibility – energy, carbon and climate pages 20 and 21; annual sustainability statement pages 31 and 32 • www.cdproject.net (MTN reports)

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GRI indicator		MTN's response (document, section, page number)
Emissions, effluent and waste		
EN17	Other relevant indirect greenhouse emissions by weight	<ul style="list-style-type: none"> • IR: An overview of our performance page 1; our environmental performance page 99 • SR: Eco-responsibility – energy, carbon and climate pages 20 and 21; annual sustainability statement pages 31 and 32 • www.cdproject.net (MTN reports)
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved	<ul style="list-style-type: none"> • IR: An overview of our performance page 1; our environmental performance page 99 • SR: Eco-responsibility – energy, carbon and climate pages 20 and 21; annual sustainability statement pages 31 and 32 • www.cdproject.net (MTN reports)
EN19	Emissions of ozone-depleting substances by weight	Due to the nature of MTN's business, this indicator is not material
EN20	NOx, SOx, and other significant air emissions by weight and type	Due to the nature of MTN's business, this indicator is not material
EN21	Total water discharge by quality and destination	The only water discharged is through the municipal sewer. Due to the nature of MTN's business, this indicator is not material
EN22	Total amount of waste by type and disposal method	The most material waste generated is old/ redundant electronic and electrical equipment. Some of the Group's network e-waste is subject to supplier take-back agreements. The MTN Group is in the process of quantifying e-waste: <ul style="list-style-type: none"> • SR: Eco-responsibility page 21
EN23	Total number and volume of significant spills	No significant spills were reported by MTN operations
EN24	Weight of transported, imported, exported or treated hazardous waste	Due to the nature of MTN's business, this indicator is not applicable
EN25	Water discharge impacts on biodiversity and water bodies	The only water discharged is through the municipal sewer. Due to the nature of MTN's business, this indicator is not material
Products and services		
EN26	Initiatives to mitigate environmental impacts	<ul style="list-style-type: none"> • IR: Our environmental performance page 99 • SR: Eco-responsibility pages 20 and 21 • www.cdproject.net (MTN reports)
EN27	Percentage of reclaimed products/packaging materials	Not available
Compliance		
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	No significant monetary fines and non-monetary sanctions for non-compliance with environmental laws and regulations have been reported

GRI indicator		MTN's response (document, section, page number)
Transport		
EN29	Significant environmental impacts of transport use: for products, materials and members of the workforces	<p>Although transportation is not a source of significant environmental impacts and is not deemed material, greenhouse gas emissions associated with transport are quantified.</p> <ul style="list-style-type: none"> • IR: An overview of our performance page 1; our environmental performance page 99 • SR: Eco-responsibility – energy, carbon and climate pages 20 and 21; annual sustainability statement pages 31 and 32 • www.cdproject.net (MTN reports)
Overall		
EN30	Environmental protection expenditure	The MTN Group does not track this indicator as part of core business activity. Through MTN CSI programmes Group-wide, we participate in environmental improvement activities such as planting trees, clearing litter in rivers and beaches/oceans
IO7	Policies and practices on the siting of masts and transmission sites including stakeholder consultation, site sharing and initiatives to reduce visual impacts	<ul style="list-style-type: none"> • SR: Eco-responsibility – responsible network management page 21
IO8	Number and percentage of stand-alone sites, shared sites and sites on existing structures	<ul style="list-style-type: none"> • 2G: 39,563 • 3G: 11,017 • Stand-alone, shared and existing structure sites' information not available • Data includes outsourced sites
Resource efficiency		
TA1	Provide examples of the resource efficiency of telecommunication products and services delivered	<ul style="list-style-type: none"> • IR: our environmental performance page 99 • SR: Eco-responsibility – energy, carbon and climate pages 20 and 21 • www.cdproject.net (MTN reports)
TA2	Provide examples of telecommunication products, services and applications that have the potential to replace physical objects	<ul style="list-style-type: none"> • IR: MTN core offerings page 17 • SR: Sustainable economic value – enterprise solutions page 16 and M2M solutions for the environment page 17
TA3	Disclose any measures of transport and/or resource changes of customer use of the telecommunication products and services listed above. Provide some indication of scale, market size or potential savings	Not available
TA4	Disclose any estimates of the rebound effect: indirect consequences of customer use of the products and services listed above, and lessons learned for future development. This may include social as well as environmental consequences	Not available

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GRI indicator		MTN's response (document, section, page number)
Labour practices and decent work		
Disclosure on management approach		
LA: MD	Management approach: employment, labour relations, occupational health and safety, training and education, and diversity and equal opportunity	<ul style="list-style-type: none"> • IR: People and remuneration pages 76 to 78 • SR: Sustainable societies – employee safety pages 24 to 26
Employment		
LA1	Employee numbers	<ul style="list-style-type: none"> • IR: Overview of our performance page 1 • SR: Annual sustainability statement page 30
LA2	Employee turnover	<ul style="list-style-type: none"> • IR: Overview of our performance page 1 • SR: Annual sustainability statement page 30
LA3	Full-time employee benefits not provided to temporary/part-time employees	<ul style="list-style-type: none"> • IR: Remuneration structure page 84; fixed remuneration page 84
Labour/management relations		
LA4	Percentage unionised employees	<ul style="list-style-type: none"> • The MTN Group does not track this indicator. The MTN Group endorses the standards set out by the International Labour Organisation and the UN Global Compact in this respect • IR: Social and ethics report page 96
LA5	Minimum notice periods regarding significant operational changes	<ul style="list-style-type: none"> • The Group provides internal notification to employees regarding significant operational changes
Occupational health and safety		
LA6	Employee representation in health and safety committees	<ul style="list-style-type: none"> • IR: People and remuneration, health and safety page 77 • SR: Employee health and safety pages 24 to 26
LA7	Total number of work-related fatalities, rates of injury, occupational diseases, lost days and absenteeism	<ul style="list-style-type: none"> • IR: People and remuneration page 77 • SR: Sustainability value add report page 31
LA8	Employee wellness programmes regarding serious diseases	MTN Group has partnered with ICAS, an international risk management services as our employee wellness provider who offer assistance on various issues but mainly counselling as the first phase of issue management. Wellness for serious diseases is also done through the medical aid
LA9	Health and safety topics covered in formal agreements with trade unions	Not available
IO3	Practices to ensure health and safety of field personnel involved in the installation, operation and maintenance of masts, base stations, laying cables and other activities	<ul style="list-style-type: none"> • IR: People and remuneration, enhancing health and safety page 77 • SR: Sustainable societies – employee health and safety pages 24 to 26

GRI indicator		MTN's response (document, section, page number)
Training and education		
LA10	Average hours of training per employee per year	<ul style="list-style-type: none"> • SR: Annual sustainability statement pages 33 to 35
LA11	Employee skills and training programmes	<ul style="list-style-type: none"> • IR: People and remuneration page 76 • SR: Sustainable societies – EMF page 25
LA12	Percentage of employees receiving performance reviews and career development	<ul style="list-style-type: none"> • SR: Annual sustainability value add report page 31
Diversity and equal opportunity		
LA13	Composition of governance bodies	<ul style="list-style-type: none"> • IR: Corporate governance highlights page 68
LA14	Ratio of basic salary of men to women by employee category	Not available
LA15	Return to work and retention rates after parental leave, by gender	The MTN Group does not currently track this indicator
Human rights		
Disclosure on management approach		
HR: MD	Management approach: investment and procurement practices, non-discrimination, freedom of association and collective bargaining, abolition of child labour, prevention of forced and compulsory labour, complaints and grievance practices, security practices, and indigenous rights	<ul style="list-style-type: none"> • The MTN Group adheres to specifications with respect to the International Labour Organisation Protocol on decent work and working conditions (core standards of freedom of association, forced labour, child labour, anti-discrimination). These requirements are integrated broadly in the MTN Group Code of Ethics, and are included in the Group social and ethics committee's terms of reference. The Group reports its integration and performance against these matters in detail to the JSE as part of the annual JSE SRI review of the Company's sustainable business performance • SR: Sustainable societies – inappropriate content, cyber-security, employee security; anti-corruption; human rights pages 27 and 28
Investment and procurement activities		
HR1	Percentage and number of significant investments that have undergone human rights screening	0%
HR2	Percentage of significant suppliers and contractors that have undergone human rights screening	0%
HR3	Total hours and number of employees receiving human rights training	0%
Non-discrimination		
HR4	Number of incidents of discrimination and action taken	The MTN Group does not currently report against this indicator
Freedom of association and collective bargaining		
HR5	Any incidents where freedom of association/collective bargaining was at risk: actions taken	The MTN Group does not currently track this indicator

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GRI indicator		MTN's response (document, section, page number)
Child labour		
HR6	Any incidents of child labour and measures taken	In 2011 the MTN Group specifically assessed whether it was compliant with the ILO child labour minimum age specification, and found that it was, with youngest employee was 17 years of age. No similar assessment was undertaken for 2012
Forced and compulsory labour		
HR7	Any incidents of forced labour and measures taken	No incidents
Security practices		
HR8	Percentage of security personnel trained in human rights	The MTN Group does not currently track this indicator
Indigenous rights		
HR9	Any incidents where indigenous people's rights were violated and measures taken	No incidents
HR10	Percentage and total number of operations that have undergone human rights reviews	0% in terms of indigenous rights
HR11	Number of human rights grievances filed and resolved through formal mechanisms	The MTN Group does not currently track this indicator
Society		
Disclosure on management approach		
SO: MD	Management approach: community, corruption, public policy, anti-competitive behaviour and compliance	<ul style="list-style-type: none"> • IR: Chairman's statement pages 18 and 19; social and ethics report pages 96 to 98 • SR: Sustainable societies – human rights pages 26 and 27
Community		
SO1	Percentage of operations with local community engagement, impact assessments and development programmes	100% of operations undertake development programmes through enterprise development, volunteering, and community-based sponsorships such as in education or health-related fields. The impact of community investment has not been assessed by MTN Group to date. The MTN Group is assessing how our business intelligence reporting solution – MTN Market Performance Report (MPR) – can incorporate some of the required measures to assess our impact in each market where the MPR is run. The Group's Foundations strategy is also under review, and monitoring and evaluation are being planned as part of the new strategic approach
Access to content		
PA7	Policies and practices to manage human rights issues relating to access and use of telecommunications products and services	<ul style="list-style-type: none"> • IR: Group strategy page 1; top risks and mitigation pages 12 and 13; social and ethics report page 96 to 98 • SR: Sustainable societies – human rights pages 26 and 27

GRI indicator		MTN's response (document, section, page number)
Corruption		
SO2	Business units analysed for corruption risks	<ul style="list-style-type: none"> The MTN Group's Fraud Risk Management framework has been rolled out to 81% of MTN's operations. This framework allows for, <i>inter alia</i>, internal corruption risk assessment SR: Sustainable societies – human rights page 27
SO3	Employee training regarding anti-corruption	<ul style="list-style-type: none"> MTN's anonymous whistleblower solution for employees and external stakeholders, Tip-offs Anonymous, has been rolled out in operations, and is accompanied by internal electronic and offline awareness campaigns. We use the number and type of calls and emails to the Tip-offs Anonymous telephone lines and email address as an indicator of usage
SO4	Actions taken in response to incidents of corruption	Due disciplinary processes are followed to investigate and resolve matters of ill discipline including corruption. Sanctions may range from warnings to termination of employment. This is reflected in the MTN Group code of ethics and disciplinary policy
Public policy		
SO5	Engagement in public policy	The MTN Group remains politically neutral in all countries of operation. However, where public comment on national policies is invited, commentary is offered
SO6	Financial/in-kind contributions to political parties	<p>MTN recognises that strong democracies require healthy political parties. These parties require resources to sustain and operate a basic party structure robust enough to represent people, develop capacity to contest elections and to contribute meaningfully to policy debates. Section 1 of the Constitution of the Republic of South Africa encourages multiparty democracy by providing parties with public funding to promote a system of government that is accountable, representative, response and open.</p> <p>As there is no single model or framework that governs party funding for corporate entities, MTN adopted its Corporate Political Contributions Policy in 2008. In line with this policy and MTN's Code of Ethics, the MTN Group board approves an allocation for political parties in relation to their performance in general elections. A similar approach with respect to supporting political parties in all other countries in which the Company operates is undertaken. Political party financial support is only provided should the country hold national parliamentary elections. No national parliamentary elections were held in 2012, and therefore no in-kind and financial support was provided to any political party for 2012</p>

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GRI indicator		MTN's response (document, section, page number)
Anti-competitive behaviour		
SO7	Number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	<ul style="list-style-type: none"> IR: CFO statement page 36 and page 177
Compliance		
SO8	Monetary value of significant fines and number of non-monetary sanctions for non-compliance with regulations	<ul style="list-style-type: none"> Telecommunication regulators in some of the countries in which MTN operates have threatened or imposed quality of service fines upon MTN based on network performance standards. Although this information is available in the public domain, we have not quantified the value of these fines for the purposes of this report
SO9	Operations with significant negative impacts on local communities	None
SO10	Prevention and mitigation of significant negative impacts on local communities, by operation	<ul style="list-style-type: none"> SR: Eco-responsibility – responsible network management page 21
TA5	Description of practices relating to intellectual property rights and open-source technologies	The MTN Group upholds intellectual property rights in its business operations
Product responsibility		
Disclosure on management approach		
PR: MD	Management approach: customer health and safety, product and service labelling, marketing communications, customer privacy, and compliance	<ul style="list-style-type: none"> IR: Social and ethics report – about freedom of expression and human rights page 98
Customer health and safety		
PR1	Lifecycle stages of products/services assessed for health and safety impacts: including percentage of products/services assessed	<ul style="list-style-type: none"> IR: Enhancing health and safety page 78 SR: Sustainable societies – EMF page 25
PR2	Incidents of regulatory non-compliance concerning health and safety impacts of products and services	<ul style="list-style-type: none"> Not available
PA8	Policies and practices to publicly communicate on EMF related issues	<ul style="list-style-type: none"> SR: Sustainable societies – EMF page 25
PA9	Total amount invested in programmes and activities in electromagnetic field research	<ul style="list-style-type: none"> The MTN Group does not invest directly in programmes into EMF research; we abide by the recommendations of the various internationally recognised authorities on this subject (WHO, ICNIRP, IEEE, NRPB(UK)) SR: Sustainable societies – EMF page 25
Product and service labelling		
PR3	Product/service information required by procedures	<ul style="list-style-type: none"> Not available
PR4	Incidents of regulatory non-compliance concerning product and service information labelling	<ul style="list-style-type: none"> Not available

GRI indicator		MTN's response (document, section, page number)
Product and service labelling <i>continued</i>		
PR5	Customer satisfaction practices: surveys etc	The MTN Market Performance Report (MPR) is an extensive assessment tool used by our operations to gauge market perceptions and customer experience and perceptions across a number of business dimensions related to network, service, functionality, value, and other indicators, and is reported to the Group executive on a quarterly basis
Marketing communications		
PR6	Adherence to marketing, promotions and communications standards	In 2012 MTN Nigeria undertook a sales promotion where customers could participate in a game and stand a chance of winning vehicles. The National Lottery Regulatory Commission was invited into the selection process when MTN Nigeria realised the promotion inadvertently could be interpreted as a lottery promotion. The MTN Group ensures that it complies with local laws, standards and codes
PR7	Incidents of regulatory non-compliance concerning marketing communications	No incidents have been reported by operations
PA10	Initiatives to ensure clarity of charges and tariffs	None
PA11	Initiatives to inform customers about product features and applications that will promote responsible, efficient, cost effective and environmentally preferable use	Part of marketing and product information
Customer privacy		
PR8	Incidents of substantiated breaches of customer privacy and losses of customer data	<p>Although unsubstantiated, incidents relating to possible breaches of customer privacy or general public allegations as a result of possible misappropriation or interception by government and other agencies have been generally made against both MTN and other global network operators, especially over the last two years as a result of the Arab Spring and global governmental movements to exert greater control over information. These issues are further addressed by the MTN Group freedom of expression, privacy and human rights work currently under internal development, and a summary of the Group's position and efforts is listed at the links below.</p> <p>MTN Group's fraud management framework identifies, among other issues, possible risks to customer data or security as a result of, for instance, SIM swaps. A specific instance (MTN South Africa) of the impact of a SIM swap transaction that may be related to breach of customer banking information in MTN South Africa was reported in Quarter 1, 2013. This incident is also under review.</p> <ul style="list-style-type: none"> • IR: Chairman's statement page 18; social and ethics report (About freedom of expression and human rights) pages 97 and 98 • SR: EMF at www.mtn.com/sustainability; freedom of expression, privacy pages 27 and 28