



21 July 2021

Henry Peck
Business & Human Rights Resource Centre
peck@business-humanrights.org

Dear Henry Peck,

MTN confirms receipt of Access Now's letter dated 18 May 2021 with regards to our recent Ranking Digital Rights (RDR) Corporate Accountability Index score. We thank you for the commendations in acknowledging that MTN made the greatest overall improvement of any company in the 2020 RDR Index, as well as our efforts toward ensuring transparency and effective management of digital human rights matters in our business.

We would like to assure you of MTN's highest commitment to respecting human rights and endeavours to protect the rights of all people using our services in the respective jurisdictions in which we operate in accordance with globally defined standards.

As an organization, we actively participate in the annual Corporate Accountability Index process working alongside Ranking Digital Rights. We also unpack the full RDR Index findings and recommendations, with a view to continuously improve our practices and reporting.

We acknowledge the recommendation from Access Now: *"MTN should report the number of network shutdown demands it received, specify the legal authorities responsible, and disclose how many such demands it complied with, without aggregating any of this data."*

In this regard, we would like to draw your attention to the following:

- MTN published its first [Transparency Report](#) which provides an understanding of our operating environment, risks and approach to Digital Human Rights across our footprint. It also provides details on requests we received from authorities and non-governmental entities. The report articulates how we respond to digital human rights incidents as well as details of actual incidents we responded to.

- The Report includes both aggregated (page 15) as well as disaggregated data per operating country in scope. For each operating country, the following information is reported:
 - **The legal framework and authorities governing lawful interceptions**
 - As the legal authorities responsible differ per operating country, the 2020 Transparency Report lists the relevant Authorities per operating country.
 - **Requests from authorities and non-governmental entities, disaggregated according to:**
 - Data requests pursuant to criminal investigations
 - Data requests pursuant to governmental or regulatory oversight
 - Data requests for location disclosure
 - Data requests for lawful interceptions
 - Data requests pursuant to suspension of MSISDNs, SIM cards, service restriction orders and internet shutdowns
 - Data requests to civil litigation
 - Data requests for personal or private use
 - **The number of authority and non-governmental requests fulfilled.**
These figures are reported for operating countries where MTN are legally at liberty to disclose such and where data is available.

To ensure that we remain agile, we are continuously innovating the way we conduct our business. Our digital human rights approach is ever evolving to remain abreast of the complex and rapid evolution of technology and regulation, as well as the macro-social and political climate.

We appreciate the comprehensive feedback on our Digital Human Rights efforts. The feedback from stakeholders like yourself helps us to continuously enhance our approach.

For more information, please contact:

MTN Group Sustainability Office | Sustainability@mtn.com