

MTN GROUP LIMITED

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09 May 2016

Peter Micek and Joy Mabenge

AccessNow and Business-HumanRights Resource Centre respectively

peter@accessnow.org and mabenge@business-humanrights.org

cc: Gregory Regaignon; Annabel Short; Chris Maroleng

Dear Mr. Micek and Ms. Mabenge

We confirm receipt of your letter of 14 April 2016, wherein our attention was drawn to the results of the Ranking Digital Rights Corporate Accountability Index. We thank you for acknowledging our efforts towards ensuring that we address the importance of digital human rights matters in our business, and for sharing your recommendations on areas in which we can improve upon in future.

We wish to draw your attention to the following:

- Our commitment to facilitating communications in the digital age was formalised in the Group's Policy on Freedom of Expression, Security and Privacy Human Rights in the Use of Information and Communications Technologies ('Human Rights Policy') in 2013. This commitment is available at the link https://www.mtn.com/Sustainability/Documents/Digital_Human_Rights.pdf
- We provide annual updates on the status of our efforts and future plans at the link <https://www.mtn.com/Sustainability/SustainableSociety/Pages/DigitalHumanRights.aspx> (last updated 25 April 2016).

MTN's Human Rights Policy was developed by taking into account the United Nations' Universal Declaration of Human Rights Articles, recommendations set out in the United Nations' Protect, Respect and Remedy Framework, and positions set out by the GSMA. We believe in the rights of all people to freely communicate and share information, and to also enjoy the rights to privacy and security in their use of digital technologies. We use our best endeavours to protect, respect and ensure these rights for users of our ICT solutions, while acting in accordance with prevailing laws of the countries where we operate, and complying with the terms and conditions of our regulatory license agreements in the countries in which we operate.

Directors PF Nhleko (Chairman), BD Goschen*, A Harper+, KP Kalyan, S Kheradpir+++ , NP Mageza, MLD Marole, AT Mikati++, MJN Njeke, KC Ramon, JHN Strydom, AF van Biljon (LID) and J van Rooyen*

Company Secretary SB Mtshali

**Executive +British ++Lebanese+++American*

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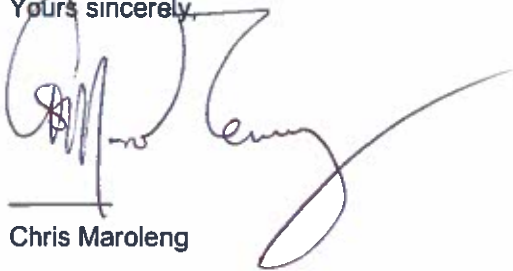
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The landscape in which ICT organisations operate globally, has been highly fluid, complex and politicised over the past few years. As a company that voluntarily subscribes to a number of global protocols governing responsible business operations, the MTN Group is working on constant improvement of operational and tactical governance and due diligence processes to mitigate risks or the impact of events that effectively limit freedom of expression, privacy and security. Implementation is an activity that will require constant vigilance to these fluid global and local developments, and we are committed to this journey. It is not always easy to balance the rights and demands of often diametrically-opposed stakeholder positions, but the Group remains committed to ongoing and systematic implementation of the human rights principles, as expressed in our policy, in all countries where we operate.

Addressing the challenges and requirements of ensuring Digital Human Rights requires the co-ordination and engagement of stakeholders across the regulatory, industry and civil society sectors. The MTN Group therefore maintains open and constructive dialogue on both specific situations and on our general progress on human rights processes with interested parties. We find these discussions useful in jointly building understanding, knowledge, capacity and support for managing this highly complex matter. Our business is about enabling communications, and therefore effectively managing this imperative is in our best interests.

We thank you for taking the time to engage with us on this important matter.

Yours sincerely,



Chris Maroleng

Executive: Group Corporate Affairs