Regulatory Affairs and Public Policy

Scope and responsibilities of MTN Regulatory function

Strengthened capabilities to support business strategy across markets.

Economic and Service regulation

Manage regulatory issues and risks, including licence acquisitions and obligations, regulatory interventions such as SMP declarations, consumer protection and financial services.

Technical Regulation

Manage technical regulation issues related to the network infrastructure, radio-frequency spectrum and Quality of Service

Regulatory Strategy and Public Policy

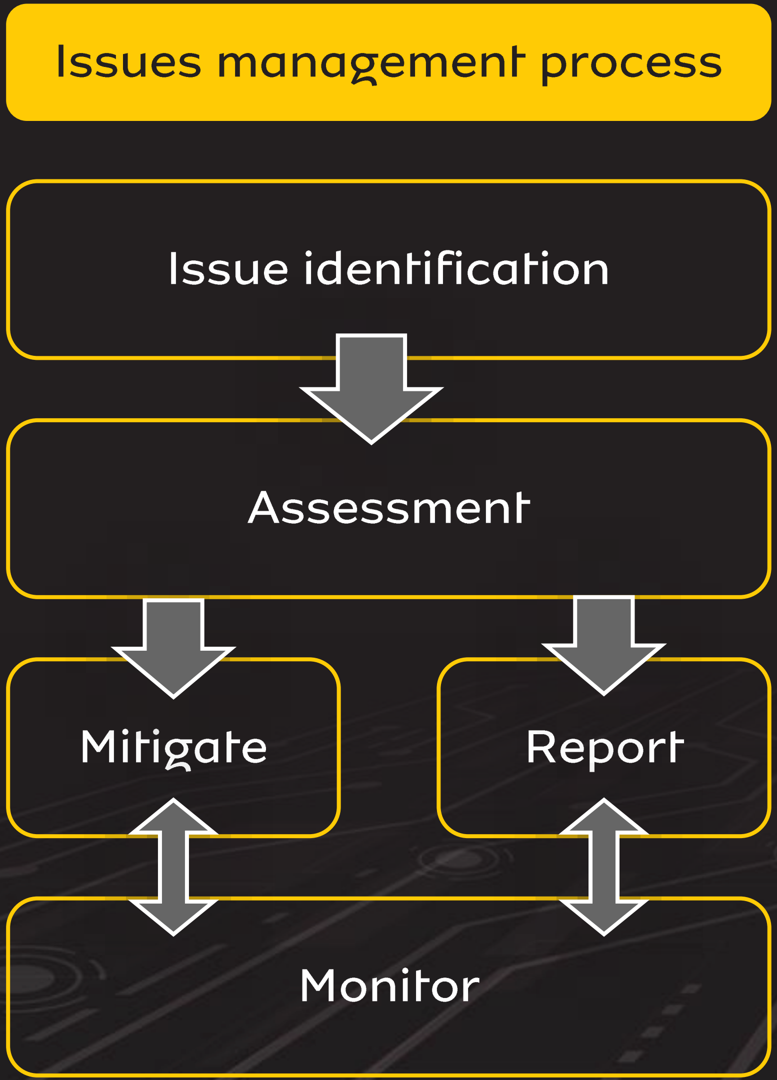
Drive the Group's public policy strategy through research, analysis and active participation in key sector forums.

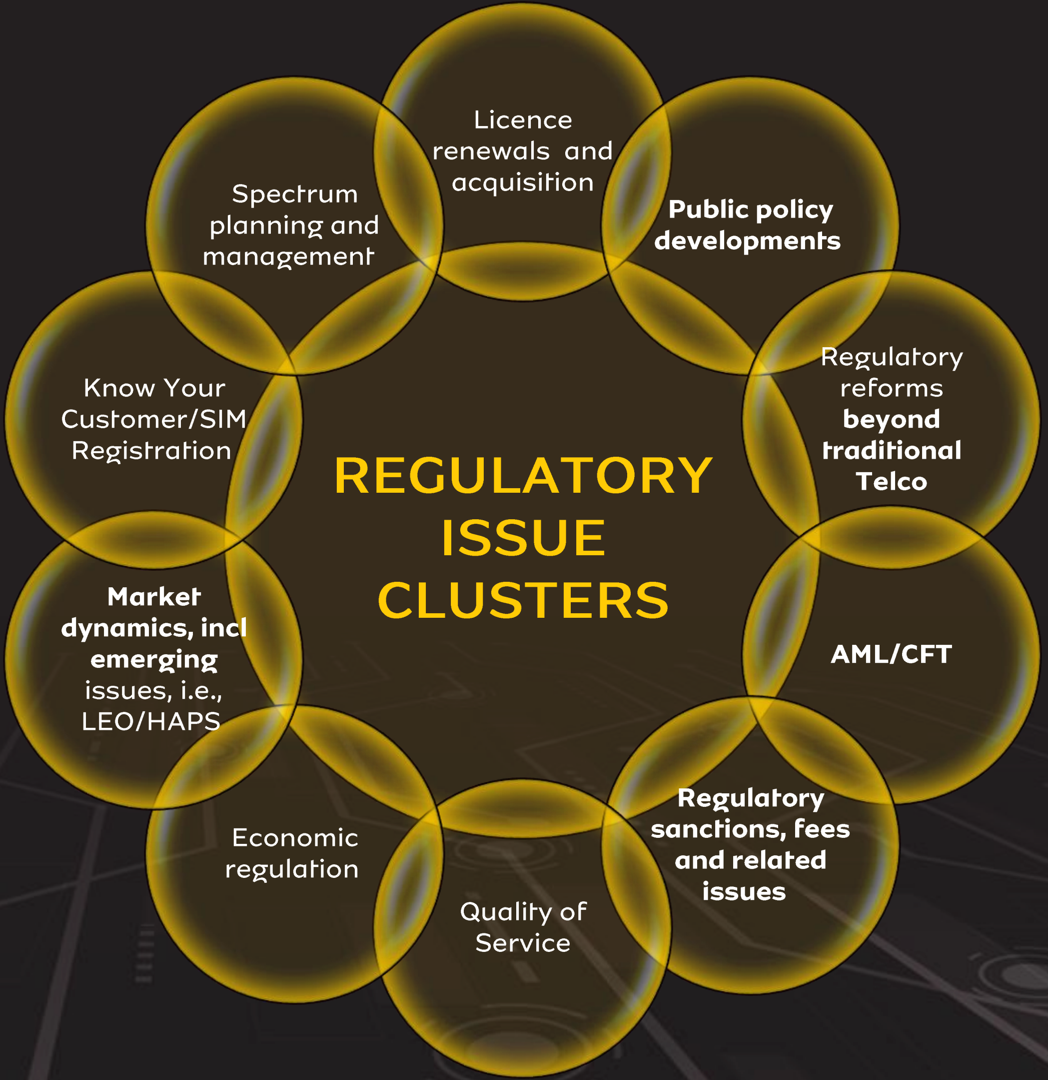
Creating an enabling environment

Enhancing regulatory environment

Advancing MTN's position on regulatory and public policy issues

Regulatory Risk Management





Key regulatory highlights (1)

Long term approach to dealing with KYC and SMP issues

1

SIM Registration / Know Your Customer (KYC)

- SIM registration issues remain pervasive across the MTN footprint and are being actively managed by the business
- Evolving regulatory requirements are supportive of national objectives and more sustainable SIM processes
- MTN has invested in significant technology to support regulators' efforts and improve SIM registration processes
- Ongoing dialogues with authorities in markets where national identity systems remain a constraint to implementation of KYC initiatives
- Group-wide interventions implemented to enable MTN to respond appropriately to reduce impact of KYC related issues across markets

2

Significant market power (SMP) / Competition

- Improved capability to respond in markets where MTN has been declared SMP or dominant
- Dominance declarations well-managed in 9 markets: South Africa, Nigeria, Zambia, eSwatini, Ghana, Cote d'Ivoire, Benin, Liberia and Congo-Brazzaville
- Compliance first approach
- Where we are not in agreement with authorities, these are being challenged based on:
  - ✓ Process/procedure/rights of defense
  - ✓ Insufficient linkage between the proper test and the imposed regulation
  - ✓ Insufficient consideration of likely (unintended) adverse consequences

Key regulatory highlights (2)

Enhanced regulatory delivery mechanism

3

Emergence of satellite operators [Low Earth Orbit (LEO)]

- MTN has developed preliminary advocacy position on satellite operators, noting their entrance in some of our markets
- Submitted commentary on license applications by satellite operators in eSwatini, ongoing monitoring in Nigeria and Rwanda
- Higher regulatory compliance burden for telcos in many of our markets, vs satellite operators
  - Advocacy approach seeks to balance ongoing partnership models with need for regulatory parity with new entrants
  - Ongoing engagement with various stakeholders to ensure regulatory parity for new entrants across all our markets in line with the regulatory principles (fairness, transparency and equality)

4

Licence renewals - playbook approach allows for across market response | guides process, timelines and engagements

GSM

- Recently, MTN has successfully concluded the renewal of its GSM operating licences in Nigeria and Rwanda.
- Regulatory has developed a uniform approach to managing licence renewals across group minimizing risks relating to licence renewals.
- The licence renewal process is currently outlined in MTN's Licence Renewal Playbook which provides guidance in terms of process, timelines and engagements.
- This playbook has been successfully deployed in guiding upcoming licence renewal in Nigeria and Rwanda.
- We have notified in Guinea Bissau, South Sudan and Sudan. We plan to notify regulatory authorities of our intention to renew in Zambia in latest Q3 2023.

FinCo

- Approach informed by best practice from GSM licensing to support the Opcos in obtaining the requisite FinCo licensing in key markets.
- This supports the ongoing work to separate the FinCo business as well as reducing the risk related to dual regulatory oversight (telecommunications regulatory authority and financial sector regulatory agencies including central banks).

FibreCo

- As part of creating an enabling environment for the business , we are providing support to the FibreCo business as they engage with various stakeholders on their deployment and licence acquisitions.

Key regulatory highlights (3)

Using capability to enhance planning.

5

Spectrum planning and management

- MTN's spectrum strategy is being refreshed with consideration to sunset legacy technologies, including 3G, to repurpose spectrum for newer technologies
- Recently, MTN acquired spectrum in South Africa, Nigeria and Zambia; includes 3500 MHz band in South Africa and Nigeria – key for 5G deployment
- MTN to participate in the ITU World Radiocommunication Conference 2023 (WRC-23) which sets out key telecoms sector global policy standards and shape development of future technologies
- Key developments: MTN has finalized an Electro-Magnetic Fields Exposure (EMF) policy in 2022 to ensure that there is uniform compliance across markets where EMF is not regulated.
  - In the markets where EMF is regulated, the local regulations will take precedence over the MTN EMF policy

Key takeaways

Proactive approach to regulatory risks

1. **Strengthened capabilities to proactively manage regulatory risks**

2. **Regulatory advocacy on current and emerging regulatory and public policy issues**

3. **Proactive regulatory risk identification and management**

4. **Collaborative approach to issues management**

   Regulatory risk identification and management with Group Legal and other functions across the markets

Thank you