



MTN Group Advertising Sales Policy and Guidelines

Business Area	Group Mobile Advertising		
Policy Reference	MTN G064	Version	Version 1
Effective Date	September 2024	Next Review Date	September 2026
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1. POLICY APPROVAL

The MTN Group Advertising Sales Policy and Guidelines (the Policy Guidelines) is an Operational Policy as defined in section 7.3 of the MTN Group Master Policy. Thus, the applicable Policy approval process, as set out in section 5.6 and Annexure B of the MTN Group Master Policy, must be applied.

2. DEFINITIONS AND ABBREVIATIONS

The definitions contained in this Policy and Guidelines must be read with the definitions in the MTN Group Master Policy and the Group Responsible Advertising

and Marketing Policy. General definitions and abbreviations which are applicable across all MTN Policies are provided for in the MTN Group Master Policy.

#	TERMS	DEFINITION
1	Advertisement	Any illustrative text or text link, banner, graphic, image, audio, video displayed within a site, app, message or other marketing or promotional material for placement within a Bearer for the purpose of promoting a commercial brand, product or service; and the term "Advertising" shall have a corresponding meaning.
2	Advertiser	The buyer of the Advertisement provisioned over the MTN network, managed and sold through Sales Channels (which may include Supplier and/or Supplier Affiliates).
3	Data Protection Laws	Data privacy and data protection legislation and regulations applicable to the Processing of Personal Data carried out by a relevant MTN Entity, or for or on behalf of that MTN Entity
4	End- User	Each person to whom Advertisement(s) are made available, or to whom Advertisement(s) are being communicated
5	Marketing	The process of promoting and selling products or services, including market research and Advertising.
6	Mobile Advertising	The communication of the Advertisement to mobile device and smartphone End-Users
7	Mobile Advertising Services	The targeted communication of product or service information to mobile device and smartphone End-Users, including the delivery of such communication by short message service (SMS) texts as well as by way of interactive advertisements. Mobile advertising services are a subset of mobile marketing services
8	MTN / MTN Group	Mobile Telephone Networks Limited , and each member of its group of companies (as defined in the South African Companies Act).
9	MTN OPCO or OPCO	Each of the operating entities within the MTN Group.
10	Personal Data	Any information relating to any identified or identifiable natural person, as defined by applicable data protection laws, including: (a) information relating to the race, gender, sex, marital status, national, ethnic or social origin, colour, age, disability, language and birth of the person;

		(b) information relating to the education or the medical, financial, criminal or employment history of the person.
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3. INTRODUCTION

- 3.1 MTN Group is a provider of value-added sourcing and procurement services on its own behalf and on behalf of the MTN OPCOs, each of which is in the business of providing a variety of services ranging from voice, data, fintech, digital, enterprise wholesale and APIs.
- 3.2 The aim of these MTN Group Advertising Sales Policy and Guidelines (“Guidelines”) is to provide an overarching framework for development, curation, provision advertising, and distribution of advertising content across the MTN Group’s operating countries using our platforms. The Guidelines are intended to balance MTN’s legal, regulatory and ethical obligations to our multiple stakeholders. They further seek to protect End-Users (including children) from accessing inappropriate advertising content, protect against damage to MTN’s reputation, also provide a framework that will assist advertisers and the MTN Group in complying with applicable laws.
- 3.3 The Guidelines are intended to be used as a framework to assist MTN and the MTN Group with compliance, however each MTN OPCO remains responsible for compliance with all applicable advertising laws (including regulations and guidance) in its own jurisdiction.

4 SCOPE AND APPLICABILITY

The Policy and Guidelines are structured in two parts:

- 4.1 Part A: Advertising Content and Conduct Requirements, applies to all advertising on the MTN Network (by both advertisers and MTN OpCos);
- 4.2 Part B: MTN Group Requirements, applies to advertising content and conduct created and placed by members of the MTN Group related to the MTN business.

5. PART A: ADVERTISING CONTENT AND CONTENT REQUIREMENTS

5.1 GENERAL CONTENT REQUIREMENTS

- 5.1.1 Advertisements shall:

- 5.1.1.1 comply with all applicable laws and regulations of the relevant country in which the End-User will view or access the Advertisement;
 - 5.1.1.2 comply with codes of conduct administered by self-regulatory advertising bodies where applicable;
 - 5.1.1.3 be suitable for a general audience, being cognisant of the context of the Advertisement and the sensitivities of the specific market where the Advertisement would be consumed, including ensuring that the Advertisement is not perceived to be unfair or discriminatory in any way;
 - 5.1.1.4 not cause serious or widespread offence to any religion, nationality, culture, gender, race, sexual orientation, age, disability or minority group.
- 5.1.2 MTN OPCOs shall make a summarised version of these Guidelines available to Advertisers and shall take reasonable measures to ensure that Advertisers check these Guidelines and ensure that their Advertisements are compliant. Where the summary of these Guidelines is incorporated by reference into an agreement between the Advertiser and the MTN Group and/or MTN OPCOs, a breach of any provision of the summary of these Guidelines shall be deemed to be a breach of the applicable agreement.

5.2 PROHIBITED OR CONDITIONAL CONTENT

- 5.2.1 Any content that is defamatory, offensive, derogatory, hateful and obscene is prohibited on the MTN Network.
- 5.2.2 The below table sets out additional instances of prohibited content or content which may be advertised following compliance with certain restrictions or conditions. Given dynamics in various OPCOs, there may be more prohibited advertising practices. OPCOs are required to include additional local requirements that exist in country:

Category	Prohibited or Conditional Content
Advance Advertisement Fee	All 'advance-fee type' advertising or Advertisement requiring the End-User to make an upfront payment of a fee before any services are rendered or goods provided but unrelated to the actual provision of the services or goods, is prohibited. For example the requirement to pay an upfront fee (or membership fee,

	participation fee, administrative or handling fee, taxes) in advance of receiving any proceeds, money, stock, or warrants – in order for the deal to go through.
Alcohol	<p>Advertisements that provide information about, promote, or support the sale of alcoholic beverages or associated products only to the extent to which this is not prohibited by applicable laws, regulations and guidelines as well as social norms or concerns (including local religious sensitivities) and public interest in each jurisdiction as applicable to each MTN entity.</p> <p>Where the laws in a particular country allow for the advertising of alcoholic beverages or associated products, the Advertisements should be intended to audiences above the age of majority or the age of licence (18 years old or the applicable age of majority/licence observed per OpCo), and should comply with local requirements regarding permitted times to advertise alcoholic beverages or associated products including brand provided age gateway and where applicable brand safe verification.</p>
Animals	<p>No advertisement may contain anything that might reasonably be thought to encourage or condone cruelty or irresponsible behaviour towards animals.</p> <p>All animals featured in an advertisement should be well looked after and must not be harmed or distressed in the creation of the Advertisement. MTN recommends seeking the support of a veterinarian or other relevant expert to ensure that they are properly treated and cared for throughout production.</p>
Behaviours	Advertisements that include messages or images promoting alcohol consumption, smoking, drug-taking, eating disorders, the bullying and exploitation, or terrorism in alignment with local and/or international law. Other examples include but not limited to fake documents, hacking software, academic cheating services etc.
Competitor Products	Advertisements that feature, offer information about, and/or promote a directly competitive product or service, offered by a direct competitor of MTN which holds a substantially equivalent telecommunications license.
Fear	Advertisements should not use fear tactics without justifiable and lawful reason.
Financial Advertising	Advertisements for financial products or services should take special care to ensure that the public is fully aware of the nature of any commitment they may enter as a result of responding to the Advertisement. Advertisers should take note of the complexities of finance, and should not be seen to take advantage of the lack of experience, knowledge or trust of End-Users e.g. cloaking, arbitrage etc.
Free offers	Advertisements should not describe products as "free" if there is any cost payable by a consumer except for delivery or postage

	costs. If there are any costs relating to delivery and postage, it must be stated clearly in the Advertisement in-country relevant advertising bodies requirements.
Gay or Lesbian or Bisexual Interest (LGBTQ-I+)	As per the country's Advertising regulation and governing body.
Gambling & Sports Betting	<p>Advertisements that provide information about, promote, or support gambling or sports betting only to the extent to which this is not prohibited by applicable laws, regulations and guidelines as well as social norms or concerns (including local religious sensitivities) and public interest in each jurisdiction as applicable to each MTN entity are prohibited.</p> <p>Where the laws in a particular country allow for the advertising of gambling or sports betting, the Advertisements should be intended to audiences above the age of majority or the age of licence (18 years old or the applicable age of majority/licence observed per OpCo), and should comply with local requirements regarding permitted times to advertise gambling or sports betting.</p> <p>See the 'Sustainability/ESG considerations for Responsible Gambling extended beyond economic goals and regulatory compliance to include ethical conduct, social impact, human and children rights protection' (available to MTN Group and its Employees upon request from the Sustainability team, Corporate Affairs) for additional guidelines to consider and requirements to comply with</p>
Hostility between Nations	Advertisements that can lead to hostility between countries, such as currency pictures torn/cut/wrinkled, torn flag image or other similar manners.
Investment Non-Financial Institutions	<p>Any Advertisements for either seeking or providing funds / capital, unless placed by licensed financial services providers or licensed advisors or brokers or the publicly listed institutions (listed on the relevant stock exchange).</p> <p>Advertisements of investment products that offer business opportunities, the promise of return of capital, lending and borrowing or profit sharing, must clearly and fully state the nature and form of bidding and mention the possible risks faced by the public if they become the investors.</p> <p>Advertisements that offer capital accumulation should clearly state that capital accumulation is only done through the capital market.</p> <p>All advertisements soliciting funds for non-profit organizations must comply with applicable laws and regulations governing charitable solicitations. Advertisers must ensure that their</p>

	fundraising activities are properly registered and authorized by the relevant regulatory bodies.
Legality	<p>Advertisements must not contain anything which might lead or lend support to criminal, anti-social or illegal activities, unethical, or appear to condone such activities.</p> <p>Advertisements must not contain anything which might lead or lend support to criminal, anti-social or illegal activities, unethical, or appear to condone such activities.</p> <p>Promoting, selling, or advertising counterfeit products, including those that imitate or infringe upon the trademarks, trade dress, or branding of others are strictly prohibited. The sale or advertisement of counterfeit goods, or goods that could cause confusion with another brand's products, is not permitted under any circumstances. e.g., passing off, counterfeit products etc.</p>
Militancy And Extremist	Advertisements that offer information about or promote or are sponsored by groups advocating anti-government, insurgency and terrorism.
Misleading claims	Advertisements should not contain any statements or visual presentations, which directly or by implication, omission, ambiguity or exaggeration is likely to mislead End-Users. Advertising must not take advantage of the good faith of our End-Users.
Mystical Content	Any Advertisements related to mystic behaviour.
Non-Availability of Advertised Products	Advertisements should not be published unless the advertiser has reasonable grounds for believing that any demand that is likely to be created by advertising can be met.
Nudity	Advertisements that offer depictions of nude or semi-nude human forms including children, alone or in groups.
Offensive Advertising	Advertisements should not contain anything that is likely to cause serious or widespread or sectoral offence in each market it would be consumed in or accessed by End-Users. In considering whether an advertisement is offensive, the context, medium, likely audience, nature of the product or service, prevailing standards, degree of social concern (including local religious sensitivities) and public interest must be taken into account.
Political and Advocacy Advertising	Advertisements that contain political content or which seek to promote a political view or a political party or which in any way could influence local politics or cause social division, especially during election periods, are prohibited. Guidance must also be had from the Group Political Contributions Policy (only accessible to MTN Group and its Employees) and related Group Policies.
Privacy	Advertisements should not portray or refer to any living person(s) by whatever means unless their expressed prior written consent has been obtained. This excludes among others:

	<p>a) Individuals that are shown in a crowd or background, provided (i) that the portrayal is not offensive; and (ii) this practice is permissible in terms of the Data Protection Laws in a particular market where the Advertisement will be consumed or accessed by End-Users.</p> <p>b) Portrayal of individuals who form part of the subject matter on advertisements for books, films, radio or television programs, press features, etc.</p> <p>Notwithstanding the above, guidance of privacy requirements must align with local data privacy and protection legislation and MTN's data privacy and protection policies, procedures and practices and prevailing social standards.</p>
Prohibited Drugs	Advertisements that promote or provide information about the use of prohibited drugs (according to local law), as well as products associated with such use or abuse.
Racism And Hate	Advertisements that promote the identification of racial – ethnical – religion – inter-group, the unfair criticism or subjection of groups, or the superiority of any group.
Safety	Advertisements should not without justifiable reason, show any dangerous practices or situations e.g., self-harm, animal abuse, trading in endangered species etc.
Self-Employment Opportunities	Advertisements for self-employment opportunities may not be phrased in a manner which is likely to lead to the opportunity being confused with part-time or fixed employment. Such advertisements may not require any money to be sent before full information about the self-employment opportunity is supplied to the End-User.
Sex	<p>Advertisements that depict or graphically describe sexual acts or activity, including exhibitionism, sale or business of sexual activity; erotica; sexual things; sex-oriented businesses as clubs, nightclubs, escort services; child pornography or the portrayal of children in sexual activity of any nature; adult products, such as pornography, sexually explicit products, toys and entertainment, products claiming to enhance sex, and other products and services of similar nature; also, Advertisements offering direct links to such sites.</p> <p>Advertisements with content which may be perceived as displaying sensuality and content that is not in accordance with social norms e.g., misleading or unrealistic claims etc.</p>
Smoking / Vaping / Inhaling	Advertisements for or about smoking or vaping or inhaling cigarettes, drugs or similar substance should not be advertised. Where the laws in a particular country allow for the advertising of smoking/vaping or inhaling, the Advertisements should be intended to audiences above the age of majority (of 18 years old, or the applicable age of majority observed per OpCo).

	<p>The Advertisements should not:</p> <ul style="list-style-type: none"> • stimulate / encourage people to smoke; • describe / suggest that smoking provides health benefits.
Trust	<p>An advertisement shall be framed so as not to abuse the trust of consumers or exploit their lack of experience or literacy level, always ensuring compliance with product-related and/or sector specific codes of conduct, standards, laws and regulations. Relevant factors likely to affect the decisions of consumers shall be communicated in such a way and at such times that consumers can take them into account.</p>
Violence	<p>Advertisements that feature promote or support acts of violence or bodily harm, including self-inflicted harm; or that unreasonably display images of death, gore, or injury; or that feature images or descriptions that are frightening and of no redeeming value.</p>

5.3 LOCAL REQUIREMENTS

- 5.3.1 MTN OPCOs must comply with the local law requirements and shall ensure that Advertisers likewise comply, including the below rules:
 - 5.3.1.1 Black-Out days/times/watershed periods: being the period during which an End-User in the country in which the Advertisements is placed should not receive any unsolicited messages or any specific type of message.
 - 5.3.1.2 Frequency of contacting the End-User: means the number of times Advertisements or Marketing can be directed towards an individual End-User in a given period.
 - 5.3.1.3 Opt-In: means when consent must be specifically obtained from an End-User to receive Advertisement or Marketing.
 - 5.3.1.4 Opt-Out: means when an End-User does not give permission to be sent further communications from the sender.
- 5.3.2 Take-down notice: means ways of removing potentially offensive content from the internet by an internet service provider.

PART B: MTN GROUP REQUIREMENTS

6.1 GENERAL REQUIREMENTS FOR MTN ADVERTISING

- 6.1.1 MTN Group is a listed company and a respected Pan-African mobile operator. The company is held in high regard by the public. To maintain its trusted position, MTN must communicate all marketing efforts to the public with respect and in a responsible manner.
- 6.1.2 MTN Advertising is guided by the standards generally accepted in relevant markets where MTN operates, including:
 - 6.1.2.1 King IV Code and Report on Corporate Governance;
 - 6.1.2.2 Advertising Regulatory Board (ARB);
 - 6.1.2.3 International Advertising and Marketing Communications Code;
 - 6.1.2.4 Interactive Advertising Bureau (IAB);
 - 6.1.2.5 Any other local marketing, advertising, privacy and consumer related laws and regulations.

6.1.3 MTN has a Group Responsible Advertising and Marketing Policy in place that provides a governance framework around advertising decisions, that ensures that Responsible Advertising principles and practices outlined within this policy are adhered to.

6.2 MTN ADVERTISING SALES PROHIBITIONS

MTN Advertising Sales prohibitions shall be in accordance with the requirements set out in Part A, and incorporate the following:

Category	Prohibited content
Discrimination	Advertisements should not contain anything that is discriminatory, unless, in the opinion of the Group Digital Services Leadership, such discrimination is reasonable and justifiable in an open and democratic society based on human dignity, equality and freedom.
Honesty	Advertisements should be honest and not abuse End-Users' trust or lack of knowledge.
Guarantee	If a guarantee is offered in an advertisement, the full terms and conditions of that guarantee should be available in printed or digital form, for the consumer to inspect.
Money-Back Undertaking	The claim "money-back" in the advertisement should only be used if a full refund of the purchase price is offered to dissatisfied consumers. Where such an offer is provided, the time within which the offer is valid should be clearly indicated in the advertisement. Terms and conditions of such an undertaking should be make publicly available.
Selling without express consent from consumers	MTN may not supply advertised goods or services to consumers without consumers' express authority or consent.
Substantiation of claims	All advertising claims in advertisements must be truthful and accurate. MTN should have available acceptable proof of all factual claims made in advertising. Awards, accolades, survey results, End-User reviews and statistical or study claims must be current (i.e. no more than 18 months old). Claims that compare MTN products to competitors require legal review.

6.3 USE OF PERSONAL DATA FOR ADVERTISING SALES PURPOSES

- 6.3.1 Any collection and usage of individual Personal Data must comply to MTN's Data Privacy and Protection Policies and Procedures, and all applicable data privacy and protection legislation (Data Protection Laws).
- 6.3.2 Appropriate measures should be in place to ensure consumers understand and exercise their rights such as: opt-out option of direct marketing lists, opt-out of OBA or IBA (Online Behavioural or Interest-Based Advertising), rectify Personal Data, require their Personal Data not to be made available to certain third parties, sign on general direct preference services, as applicable.
- 6.3.3 When using targeted Advertising, MTN OpCo should take special care to ensure that these practices comply with applicable Data Privacy Laws and MTN's data privacy and protection policies and procedures. MTN OpCos shall ensure that their targeted advertising content is clearly labelled to indicate that it comes from MTN directly. MTN shall also disclose the types, processes and technologies MTN uses to undertake its targeted advertising.

6.4 POLICY COMPLIANCE

- 6.4.1 Any disciplinary proceedings emanating from a breach of this Policy and Guidelines shall be dealt with in accordance with the MTN Group Disciplinary Code and Procedure.
- 6.4.2 Where an Employee, contractor or third-party is suspected of breaching the Policy and Guidelines, an internal investigation will be undertaken and, depending on the outcome, disciplinary action or civil and/or criminal legal action may be taken against the offending Employee, contractor or third-party.

7 DOCUMENT CONTROL

- 7.1 This Policy and Guidelines may be reviewed in alignment with the terms of the MTN Group Master Policy or as may be required for compliance purposes and to maintain its relevance and applicability. Business and/or legislation may necessitate more frequent review(s).
- 7.2 Any reviews to these Guidelines shall accordingly be facilitated by the business owner(s) of the Guidelines.

- 7.3 It is the sole responsibility of the Guidelines owner(s) to ensure that any approved Guidelines changes are accordingly communicated to the various stakeholders using the applicable channels.
- 7.4 If the Guidelines are not reviewed, within the specified time frame, then the provisions of the Guidelines shall remain operational and applicable until the Guidelines are next reviewed.

8. REFERENCED DOCUMENTS/RELATED POLICIES

Document Name	Publication Date	Published By
MTN Group Responsible Advertising and Marketing Policy	September 2022	Group Marketing