



**PRACTICING THE 10 PRINCIPLES  
THE MTN NIGERIA WAY  
APRIL 2010**

Communication on Progress Report to the  
United Nations Global Compact

# **COMMUNICATION ON PROGRESS TO THE UNITED NATIONS GLOBAL COMPACT**

## **Practicing the 10 principles – the MTN Nigeria Way** **April 2010**

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## Background Information

Company name	MTN Nigeria Communications Limited
Address	Golden Plaza Building Falomo, Ikoyi Lagos <b>Mailing Address:</b> P.M.B. 80147 Adeola Odeku Post Office Victoria Island Lagos
Country	Nigeria
Telephone no.	+234 803 902 0001
Web address	<a href="http://www.mtnonline.com">www.mtnonline.com</a>
Submission date	April 2010
Membership date	2006
Number of employees	Over 5290 permanent and contract staff
Sector	Telecommunications
Contact name	Akinwale Goodluck
Position	Corporate Services Executive



*MTNN's Corporate Head Office - Lagos, Nigeria.*

## Nature of Business

### We are Nigeria's Leading Network...

MTN Nigeria is part of the MTN Group, a global brand which is at the forefront of the growth of telecommunications services in Africa and the Middle East.

***Our vision is to be the leader in telecommunications in emerging markets.***

To achieve this, MTN subsists on its core brand values of **Leadership, Innovation, Integrity, Relationships**, and a **Can do** attitude. We pride ourselves on our ability to make the impossible possible, connecting people with friends, family and opportunities while enriching lives through a rich array of products and services.

With a 50% market share of the mobile telecoms market in Nigeria, we are proud to say that we are Nigeria's leading network; and the largest mobile operator with over 30 million subscribers in just eight years of operation.

### ... And the Market leader since 2001...

Since we commenced business operations in 2001, we have consistently placed a high premium on building a first class network, excellent customer service and value-added services which truly enrich customers' lives.

Our overriding strategy is also to become a significant catalyst for Nigeria's socio-economic growth, and this has led to continuous financial investments by MTN. This has contributed in no small part to revitalizing the fledgling telecoms industry in Nigeria since its rebirth in 2001.

Indeed, we have invested over \$4 billion US dollars in network infrastructure alone, giving rise to a 10, 457km digital transmission backbone, and a separate 9,056km fibre optic superhighway- the largest privately owned fibre optics system in Africa.

#### A History of Firsts...

- *The First mobile operator to launch the Blackberry prepaid service worldwide.*
- *First mobile operator in Nigeria to record one million active subscribers in 2003*
- *First Nigerian telephony company to establish a Foundation with dedicated funding for CSR*
- *First mobile operator in Nigeria to actively explore environmentally-friendly alternatives in its mode of operations, giving rise to the introduction of bio-degradable recharge cards and the use of electronic airtime (to save paper)*

MTN also has the most expansive network coverage, spread across over 2148 cities, towns and villages across all 36 states of the federation, including the Federal Capital Territory (FCT). This means that MTN provides network coverage to **83.40%** of Nigeria's land mass, while over **84%** of the population have access to our services.

In other ways, we are committed to adding value to this same population through our efforts at ensuring good corporate governance, which have earned us commendation from various arms of government. We are proud to note that our level of fiscal compliance (through various tax payments) has made a significant contribution to Nigeria's Gross Domestic Product. We have also paid more than US \$2.5 Billion\* in various levies and duties to the Government, and have committed over US \$34 million\* to various sponsorships and Corporate Social Investment causes as at December 2009.

In all, MTN is proud to be at the forefront of Nigeria's ICT revolution, developing innovative products and services to empower people and enrich lives.

We aim to continue to lead Nigeria's mobile evolution with cutting-edge convergence services that break down the walls between different sectors such as mobile telephony, data and internet, mobile commerce and fixed landline services, thus enabling a viable, sustainable future for Nigerians.

**...And also known as the No 1 CSR Telecoms Company...**

MTN's robust approach to Corporate Social Responsibility is three-pronged and covers:

- Good Corporate Governance
- Inherent value addition to society through our presence/products and services
- Corporate Social investments through the MTN Foundation

Our awareness of the need to promote environmental and Corporate Social Responsibility have earned us a reputation as "***The No . 1 CSR telecoms company***", and as the first Nigerian mobile company to establish a Foundation, we go the extra mile in putting smiles on the faces of Nigerians through sustainable projects that have a high impact on the quality of life in communities across Nigeria.

The MTN Foundation's vision is to be the leader in Corporate Social Investment (CSI) initiatives in Nigeria, measured by the impact and sustainability of our projects on host communities, where we operate and intervene in 3 key focal areas - Education, Health and Economic Empowerment.

***The MTN Foundation***

- *Foot prints in 28 states of Nigeria + Federal Capital Territory*
- *18 projects ongoing in 120 project sites*
- *Reference point in Nigeria for project-driven, wide impact and sustainable CSI in line with international best practice*
- *Recipient of numerous national & international awards and accolades*

The Foundation is funded by up to 1% PAT (Profit After Tax) from MTN Nigeria and deploys a unique brand of project-driven, wide impact, sustainable corporate social investment programmes which have won several accolades. The more recent awards were the United Nations International Development Organisation (UNIDO) Africa Investor Award for best initiative in support of the Millennium Development Goals (MDGs) and the 2008 Social Enterprise Reports and Awards (SERA) for Most Socially Responsible Company in Nigeria.

Through its efforts, the MTN Foundation has made huge impact and has become a model for good corporate citizenship, endorsed by a wide variety of stakeholders – Government, Regulators, Tax authorities, and the beneficiaries of its numerous projects.

**\$1 = N148.162 as at December 2009**



## Executive Statement of Continued Support for the Global Compact



Welcome to the third Communication on Progress Report for MTN Nigeria covering our activities in 2009. This report speaks to our commitment to the principles of the United Nations Global Compact, (UNGC); a commitment that we are proud of - and a responsibility that we value as much as we value our employees, customers, partners, and our business.

Indeed, Corporate Social Responsibility is one of the crucibles upon which our company is founded, in addition to our Corporate Values, and our conviction in sound business policies, practices and processes.

We believe that companies should embrace the custom of giving back to their community of operation and caring for the environment while practising responsible and ethical business activities.

In addition, they should endeavour to make these actions public, not so much to receive public acclaim, but more to serve as a practical example thereby encouraging other companies and organisations (public or private) to do the same.

Over the past year, our practices and progress in the areas of human rights, labour standards, the environment and anti-corruption continued to challenge other organisations to embrace similar practices and we are proud to be an example to others.

In 2010, we intend to remain focused on the three key priorities of **accountability, transparency and collaboration**, which we have identified as vital to the development of a culture of strong corporate governance.

Despite a challenging business environment in 2009(as it was for most other companies) we are pleased that we were able to make good progress in adhering to the UNGC principles, some of which have been showcased in this report.

We are proud to be a part of the United Nations Global Compact, and I hereby restate MTN Nigeria's commitment to the principles. I also acknowledge the crucial role of MTN staff, Management and the Board of Directors, whose individual and collective support have led to the achievements highlighted in this report.

Thank you

**Ahmad Farroukh**

Chief Executive Officer, MTN Nigeria

## **About This Report**

The United Nations Global Compact (UNGC) is the World's largest voluntary corporate citizenship initiative.

The UNGC issues Ten Principles on Human Rights, Labour Standards, the Environment and Corruption which are listed below:

### **Human Rights**

Businesses should:

- Principle 1: Support and respect the protection of internationally proclaimed human rights; and
- Principle 2: Make sure that they are not complicit in human rights abuses.

### **Labour Standards**

Businesses should uphold:

- Principle 3: the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in employment and occupation.

### **Environment**

Businesses should:

- Principle 7: support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### **Anti-Corruption**

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Membership of the UNGC requires companies to issue a Communication on Progress (COP) report annually.

The report you are about to read is MTN Nigeria's third COP report, ([See previous report - http://www.unglobalcompact.org/participants/detail/6723-MTN-Nigeria-Communications-Ltd-](http://www.unglobalcompact.org/participants/detail/6723-MTN-Nigeria-Communications-Ltd-)) and outlines our activities in support of these ten principles.



## **Summary of Highlights in This Report**

### **Human Rights**

- **Empowering our Employees** – Increased participation in Group Culture Audit and other Volunteer programmes, New Recognition and Reward schemes in 2009
- **Empowering our Communities** – Increased sponsorships of Cultural Events, Medical Interventions, Scholarships and Investment in Infrastructure

### **Labour Standards**

- **Bridging the Gender Gap** – More Female Managers, More Female Entrepreneurs
- **Bridging the Educational Gap** – More International Distance Learning Programmes, More Registered Employees, More Potential Graduates!

### **Environment**

- **Going Green** – Adoption of new carbon-reducing measures across the business
- **Going Online** – Adoption of new E-based initiatives aimed at conserving paper and ensuring more eco-friendly operations

### **Corruption**

- **Working Against Corruption** – Successful Launch of a Group-wide Whistle-Blower Service

## Human Rights

- Principle 1 - Businesses should support and respect the protection of internationally proclaimed human rights.
- Principle 2 - Businesses should make sure they are not complicit in human rights abuses

### **Strengthening our commitment through Policy**

Our success as a business is dependent on **our people** - our employees, customers, suppliers and partners - who believe in what we stand for.

As a company, we are committed to upholding and enforcing codes of conduct that promote fundamental human rights as defined by the Universal Declaration of Human Rights.

We are also committed to ensuring that **our people** are not complicit in human rights abuses on the basis of physical disability, gender or race thereby promoting diversity and equality in the organisation.

This commitment is applied through various policies that govern our work and business relationships. These include:

[Wellness Policy](#), [MTNN Code of Ethics](#), [MTNN Corporate Business Principles](#), [Guidelines in the Conduct of Government Affairs](#), [Supplier Code of Conduct](#), [Conditions of Service Manual](#), [Supplier Code of Conduct](#), [MTNF Policy Manual](#);

We have also demonstrated our commitment through actions that conform to the various articles of the Universal Declaration of Human Rights as shown below:

### **Demonstrating our commitment through Action**

*UDHR Article 12: no one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, or to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks*

- MTN Nigeria recognises the importance of ensuring the privacy of sensitive company information, and has taken steps to ensure that such information is protected. In October 2009, MTN organised an Information Security Week campaign (Integrating email, videos, and SMS messages) to sensitise staff on the company's clean desk policy, and also educate them on ways through which improper usage/access to official passwords, email, software and internet may compromise important business and personal information.

*UDHR Article 19: Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.*

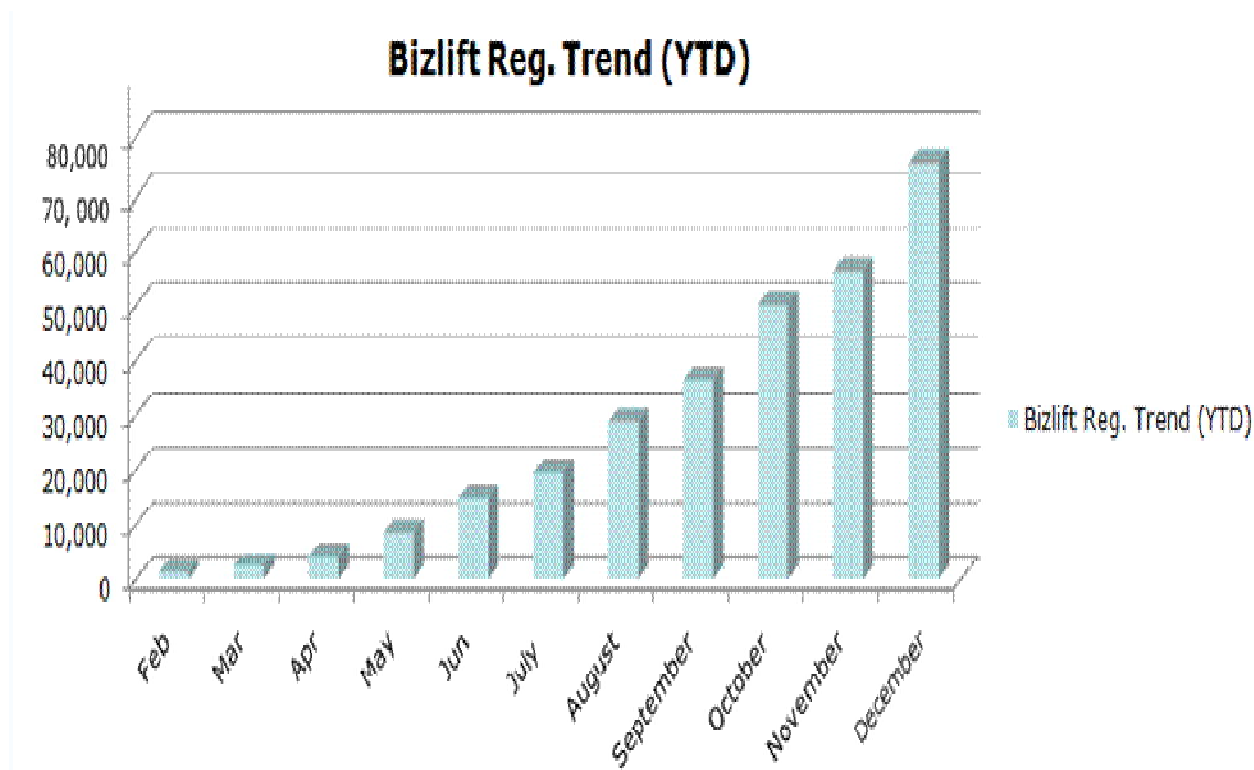
- MTN recognises that freedom of speech is a fundamental human right and therefore promotes honest feedback as well as encourages objective opinions without fear of victimisation. In 2009, Management worked successfully towards ensuring 100% staff participation rate in the company's Cultural Audit survey. Organised by an independent consultant, the results from this survey are treated confidentially thus ensuring total anonymity.

*UDHR Article 23(3): Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.*

- To recognise the exemplary efforts of its employees who contributed to its success in 2008, The Management of MTN Nigeria announced the award and disbursement of various one-off household gifts to all employees. This initiative (which was carried out in 2009) had a monetary value of over \$3million and is in addition to the annual salary increments and bonuses which are paid regularly to ensure that all employees receive at least a decent living wage for them and their dependants.
- In 2009, MTN Nigeria embarked on a registration drive to promote a new Sales reward initiative called **BizLift**. This is a structured relationship management programme designed to **engage**, empower **and expand** the businesses of the company's small scale retailers who are the last mile in our chain of distribution, while rewarding them for their achievements.

The diverse benefits derived from this project have led to a rapid registration of existing and new retailers, such that by December 2009, we now support **72,493** small and medium - scale retailers, who in turn support their families.

See graph below on growth in Registration of Bizlift Retailers in 2009.



*(For more details on this project, please see Appendix 1: Corporate Social Responsibility Review)*

*UDHR Article 25(2): Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.*

*MTN Nigeria has always proudly offered special privileges to its female employees who become mothers. These include 100% salary payment during maternity leave, the right to return to work, time off for ante-natal treatment, and early closing time for nursing mothers.*

- In 2009, MTN Nigeria sponsored 9 children to various hospitals in India, Dubai and South Africa for corrective heart surgeries, extensive facial/bodily reconstruction and cases of water retention in the head. The funds provided covered their travel, accommodation and feeding for the child and one parent.
- 2 adults also received free medical treatment in Lagos and India for various ailments.
- In an improvement over 2008's performance, MTN Nigeria's employees contributed a total of **2.3 million naira\*** and also made contributions from their personal finances, food and clothing to support various orphanages in Nigeria. Part of the funds raised from this company-supported initiative went towards heart surgery in India for a nine month old baby.

**\* \$1 = N148.162 as at December 2009**

*UDHR Article 26(1): Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit.*

Since 2004, MTNN has promoted the right of Nigerian children to receive qualitative education, and has demonstrated its support in various ways.

- In June 2009, MTNN working through its foundation, commissioned the latest phase of its MTNF *Universities Connect* project in the University of Nigeria, Nsukka, Enugu State. Under the scheme, the University library received the following:
  - 128 networked computers
  - 3 network servers
  - 2 printers
  - 100KVA generator
  - VSAT equipment and internet connectivity with a 2 year paid subscription
- In November 2009, The Foundation also commissioned a similar version of this project across 4 secondary schools in Imo state. Under its MTNF *SchoolsConnect* project, the foundation provided the following to each of the four secondary schools in the state.
  - 21 computers and a server
  - VSAT equipment and internet connectivity bandwidth subscribed for 1-year
  - Furniture to seat 42 students in the lab
  - Subject software to serve as teaching aids
  - Insurance cover for 1-year
  - A printer, multimedia projector and white board
  - Teacher training at a selected location in the state for 6 teachers
  - Retainer fees for local technical company for 1-year to provide technical support
  - 30 KVA generator and 4 air conditioners

It is noteworthy that similar 'digital laboratories' like these have been replicated in two other universities, and 49 secondary schools in 12 states in Nigeria.

*For more details on this project, please see  
Appendix 1: Corporate Social Responsibility Review*

- The MTN Foundation also launched a new initiative towards empowering students in secondary schools with the necessary tools to enhance learning. Tagged *the MTN Foundation Learning Facility Supply Project*, the scheme which began in 2009 has seen the distribution of over 36,000 exercise books, 2,064 school bags and 28,228 rain coats to 93 schools across the six geo-political zones.
- In addition, the Foundation also donated 900 desks and benches for students in three secondary schools, and 100 tables and chairs for their teachers. The overall objective is to supply a total of 3000 desks and benches and 300 chairs.
- In 2009, MTNN gave out scholarships to 70 students from the Niger Delta region, to support the educational development of indigenes of this region. This is particularly pertinent in light of this fact: The Niger Delta region is a key player in Nigeria's economy owing to the vast oil resources in this area. However, people in this region have been historically neglected, remaining underdeveloped despite the presence of several multinationals operating in this region.

*In 2009, we initiated and commissioned 12 community projects in the Niger Delta, and sponsored various events in the region as part of our contribution to lifting the living standards of the people*

*UDHR Article 27(1): Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits.*

- MTN Nigeria is actively discovering and exploring new ways of strengthening our relationship with our customers as a means of upholding their right to celebrate life and enhancing their ability to do so meaningfully. This is why MTN sponsors various cultural festivals of most of the country's 250 ethnic groups thereby celebrating the rich cultural diversity of Nigeria and promoting a strong community spirit amongst the people.  
**In 2009, MTNN sponsored 32 cultural festivals and celebrations across the country.**

*(The list of MTN-sponsored cultural celebrations is attached in the appendix of this report.)*



## **Labour Standards**

- Principle 3  
Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- Principle 4  
Businesses should support the elimination of all forms of forced and compulsory labour
- Principle 5  
Businesses should support the effective abolition of child labour.
- Principle 6  
Businesses should uphold the elimination of discrimination in respect of employment and occupation.

### **Strengthening our commitment through policy**

As an organisation with a highly skilled workforce, we place a lot of value on creating the most conducive work environment for our employees, while continually attracting the best talent.

We believe that organisations play a pivotal role in creating the opportunities and environment that will nurture and promote the advancement of women. As such, we seek to promote a culture that is gender sensitive with zero tolerance towards actions, attitudes or policies that might in any way discriminate against our female employees.

We have also drafted policies that will ensure that we do not engage in forced labour, nor discriminate against persons based on their ethnic origin, marital status, religion, race, colour, age and physical disability.

In addition, MTNN supports the participation of its employees in structured processes which will serve as a platform for negotiating work conditions and office regulations.

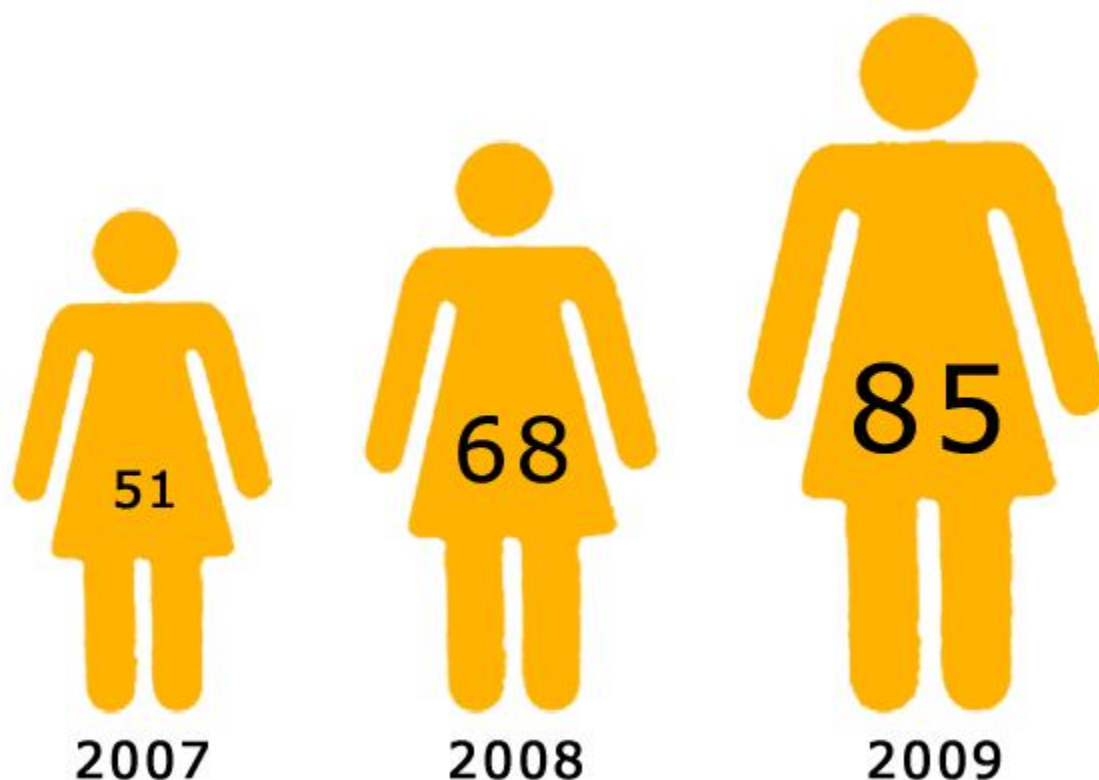
To this effect, we have introduced significant changes to our recruitment processes to promote fairness and equity while ensuring that we recruit the best hands. These include competency based assessments for new recruits and for staff across all levels, as well as function-specific tests for junior staff wishing to assume new job functions in other divisions.

Finally, MTNN strongly rejects all forms of child labour and upholds activities which prevent its occurrence. We ensure strict adherence to age restrictions for our labour force and also enforce this with all sub-contractors and service providers such that recruitment of under-aged personnel is strictly prohibited.

We commit our business to upholding the aforementioned objectives via the following policies: the [Conditions of Service Manual](#), [Employee Council Constitution](#), the [MTNN Code of Ethics](#), and the [MTNF Policy Manual](#)

## Demonstrating our commitment through Action

### Our Employees



**NUMBER OF FEMALE MANAGERS IN MTNN**

- In keeping with our principle of deliberately encouraging and recruiting qualified female employees, MTNN appointed 20 new female managers, up from the 17 appointed in 2008. This brings the total number of female managers to 85 out of 283 managers.
- To ensure better service delivery to staff, and enhance our ability to receive and resolve diverse employee concerns, queries and suggestions, MTNN set up a central HR helpdesk office in July 2009. Employees can now receive quick and efficient response to their issues once they access the HR helpdesk through multiple channels (**phone, email, web**) (Short dial for HR helpdesk is 601, email is [HRHelpdesk@mtnnigeria.net](mailto:HRHelpdesk@mtnnigeria.net))
- MTNN, in partnership with Research and Development International, UK, operates an Accredited Learning Scheme for its employees. This Distance Learning Programme, which

is partly funded by the company, is one of the various channels used to promote the educational and professional development of MTNN employees.

In 2009, following the introduction of new courses to widen the scope of study for employees, a total of 104 employees applied for 11 educational programmes in the UK, and were successfully granted admission. MTNN has paid over 217,787.32 GBP (estimated at **51 million naira**) to the various universities as the first instalment of fees for its employees

### **Protecting Women and Children**

- Working through its foundation, MTN partners with leading NGOs which promotes entrepreneurship amongst youth and women. **In 2009, a total of 1600 female entrepreneurs were trained across 20 states.** These training programmes are targeted at empowering women to take care of their families and support their children in obtaining a good education, thereby, making them less of a target for forced labour
- A major part of our commitment to preventing exploitation of children involves providing for those who face the highest risk of being recruited into the ignoble trade of child trafficking. Since 2006, the MTN Foundation has catered for the welfare of 250 orphans and vulnerable children under its MTNF CARES project. In 2009, we continued providing directly for these children, ensuring that they receive scholarship and educational support, medical care, nutritional and psychosocial support through special events designed to build their skills, confidence and resilience.
- MTN also sponsored the Great Hope Walk 2009, which is held annually to raise awareness of the plight of Orphans and vulnerable children. Events were held in Lagos, Abuja, Cross River, Kogi and Sokoto on the 21<sup>st</sup> November, 2009. It was also held in Gombe, Rivers, Imo and Kwara from the 26<sup>th</sup> November, 2009 to 5<sup>th</sup> of December, 2009. Over 10,000 participants attended across all locations.

## Environment

- Principle 7  
Businesses should support a precautionary approach to environmental challenges.
- Principle 8  
Businesses should undertake initiatives to promote greater environmental responsibility
- Principle 9  
Businesses should encourage the development and diffusion of environmentally friendly technologies.

### Strengthening our commitment through Policy

MTN is committed to ensuring that our operations, employees and the communities are environmentally safe and in total compliance with international environmental regulations. We have therefore developed an Environmental Management System (EMS) in partnership with other players in the industry, business, government and NGOs to work towards caring for and preserving our world.

Section 5 of our [MTNN Code of Ethics](#) also covers our commitment to ensuring a safe environment for employees, whilst ensuring greater environmental responsibility across the country with regards to all our products and services.

We also adhere to a written environmental policy which is available on notice boards across all our offices, and also in form of an electronic media. The policy comprises a Safety, Health and Environmental (SHE) Policy and a waste disposal and management policy.

*(Please see below for samples of our Environmental policy in MTNN offices)*



## **Demonstrating our commitment through action**

### **Transportation**

- MTNN operates a fleet of 43 staff buses (as at December 2008). In 2009, we approved the addition of 20 new staff buses to pick and drop employees from work. Apart from reducing the incidences of staff driving to the office, this will significantly reducing the rate of carbon emissions as much as possible.
- We also strive to use vehicles that are energy-efficient and have minimal impact on the environment
- We have also introduced and encouraged the use of video conferencing amongst staff to reduce cases of travel where possible.

### **Expansion of E-transactions**

- To reduce the use of paper as well as mailing expenses, our e-billing service was improved in 2009. The project, codenamed ***E-care II*** involved the upgrade and redesign of various aspects of our billing software, and the introduction of a new platform for online payment of Post-paid subscribers' bills. It aims to create an enhanced platform which will enable 100% self-service for all post-paid customers
- Internally, various processes were also automated to reduce paper resources. A good example is the introduction of the online pay slip application, which now enables employees to view their payslips online instead of receiving paper slips. This solution has ensured a 90% reduction in stationery costs previously used in printing paper salary slips. It also offers huge savings on courier costs and the associated transportation costs.
- MTNN has been in the forefront of using bio-degradable recharge cards which are environmentally friendly. In 2009, we were able to actively promote the spread and usage of electronic airtime as a mode of recharge. This follows the successful upgrade of our Prepaid Management System (PPMS) platform, which now enables us to process over 20 million recharge vouchers a day.

## Energy

- The challenge caused by erratic provision of electrical energy in Nigeria requires that the company continues to source its energy requirements from diesel generators. **This currently accounts for 80% of our energy needs.** However, the process of replacing ageing, defective and noisy generators with sound-proof ones, which began in 2008, has continued in 2009.
- These new generators come installed with fuel cut-off systems to mitigate fire, with perimeter fencing and warning signs are installed to ensure that our installations pose no danger to the communities where we operate.
- We also ensure that the noise decibel levels of generators installed at all new sites are compliant with internationally approved standards of 65dBA at 7m noise level. This is achieved in partnership with the various regulatory bodies at federal and state levels who carry out periodic environmental audits on our sites.
- In addition, various energy saving actions such as introducing high-efficient air conditioners in office buildings, adjusting room temperatures, turning off lights in unused spaces, and managing cooling and heating systems after work hours has contributed to a reduction of CO2 emissions in 2009.

In 2009, no penalties were levied to the company for violating environmental laws.



## Corruption

### G.C Principle 10

- Businesses should work against corruption in all its forms, including extortion and bribery.

### **Strengthening our commitment through policy**

MTN has a zero-tolerance policy in its commitment against corruption in all forms. Several policies and practices have been put in place to ensure this: [MTN anti-fraud policy](#), [Conditions of Service Manual](#), [MTNN Code of Ethics](#), [Disciplinary Process](#), [MTN Nigeria Gifts & Donations Policy](#)

### **Demonstrating our commitment through action**

- In 2009, MTNN worked with other operations across Africa and the Middle East to support the deployment of a new anti-corruption initiative, tagged the **MTN Tip-Offs Anonymous** whistle blower service. This is an MTN Group initiative that allows staff in any MTN operating country to report unethical practices to an anonymous toll-free line hosted by Deloitte International, South Africa. **To build awareness and promote this initiative amongst MTNN employees in Nigeria, a total of 30 road shows were held in 2009 across 8 cities in Nigeria.**
- For the first time, MTN Nigeria took part in extensively marking the International Fraud Awareness Week (November 8 -14, 2009), with several activities to raise employee awareness of fraud and its negative impact on businesses and the country.
- MTNN has successfully implemented an improved version of its **Pro-Audit** software to help automate our internal audit processes and contribute to improved efficiency for the business.
- In 2009, MTN Nigeria also adopted the Enterprise Risk Management framework (ERM), designed to provide proactive solutions that ensure efficient risk management. This enables us as a business to protect and create value for our various internal and external stakeholders while ensuring business sustainability.

## **Making This C.O.P Available To Stakeholders**

*An electronic version of the C.O.P will be made available to the following stakeholders:*

- ✓ *All categories of staff*
- ✓ *MTNN/MTNF Directors*
- ✓ *MTN Suppliers*
- ✓ *MTN Consultants and agencies*
- ✓ *Media partners*
- ✓ *MTNF Implementation partners*
- ✓ *MTN Health providers*

## **APPENDIX 1: MTNN Corporate Social Responsibility Review**

**The MTNN Corporate Social Responsibility Review** is a comprehensive reporting tool for communicating MTNN's response and commitment to environmental, ethical and social issues and a credible engagement tool for our diverse stakeholders.

It is available for download in PDF format and can be accessed by clicking on this link:

<http://www.mtnonline.com/documents/MTNNCRReview.pdf>

Printed copies of the report are also available at the company's Corporate Head Office in Lagos, Nigeria.

## APPENDIX 2: List of MTNN Sponsored Festivals in 2009

Region	Festival	Date
<b>Lagos</b>	Lisabi Festival, Lagos	23 <sup>rd</sup> – 28 <sup>th</sup> of February 2009
	Eebi Epe Festival, Lagos	23 <sup>rd</sup> to 28 <sup>th</sup> of March, 2009
	Omu Eleni Festival , Ogun	4 <sup>th</sup> – 11 <sup>th</sup> April 09
	Badagry festival, Lagos	23 <sup>rd</sup> –29 <sup>th</sup> of August 2009
	Sagamu Festival, Ogun	24 <sup>th</sup> -31 <sup>st</sup> October 2009
	Ikorodu Festival, Lagos state	14 <sup>th</sup> -21 <sup>st</sup> November 2009
<b>North West</b>	Argungu Fishing Festival, Kebbi	9 <sup>th</sup> to 14 <sup>th</sup> of March, 2009
	Durbar Sallah Celebrations (held in Kano, Katsina and Zaria)	21 <sup>st</sup> – 24 <sup>th</sup> of September 2009
<b>South East</b>	Igu Aro-Ndigbo Festival, Anambra	20 <sup>th</sup> - 21 <sup>st</sup> of February 2009
	Anioma Cultural Festival, Anambra	28 <sup>th</sup> of March to 13 <sup>th</sup> of April 2009
	Ikeji Festival, Imo	15 <sup>th</sup> to the 19 <sup>th</sup> of April 2009
	Iriji Mbaise Cultural Festival, Imo	14 <sup>th</sup> – 15 <sup>th</sup> August 2009
	Ofala Onitsha Festival, Anambra	5 <sup>th</sup> – 6 <sup>th</sup> October, 2009
	Ofala Nnewi Cultural Festival, Anambra	22 <sup>nd</sup> – 23 <sup>rd</sup> December 2009
<b>North East</b>	Kwete Wrestling Festival, Adamawa	10 – 13 March 2009
	Nwonyo Fishing Festival, Taraba	24 April 2009
	Ovia Osese Cultural Festival, Kogi	24 -30 April 2009
	Fare-Fare Festival, Adamawa	17 – 19 June 2009

<b>South West</b>	Oke-Ila Orangun day, Osun	10 <sup>th</sup> and 13 <sup>th</sup> of April 2009
	Igbajo day, Osun	6 <sup>th</sup> -11 <sup>th</sup> of April, 2009
	Osun Oshogbo festival in Osun State	August 2009
	Udiroko festival in Ado- Ekiti	September 2009
	Igogo festival at Owo in Ondo state	September 2009
	Sango festival in Osun State at Ede	October 2009
	Olojo festival at Ile-Ife in Osun State,	November 2009
	Ile-Oluji festival in Ondo State	November 2009
	Oyemekun festival in Ondo State	November 2009
	Ekinmogun festival in Ondo State	November 2009
	Igue Festival Benin city, Edo	December 2009
<b>South South</b>	Leboku International Festival, Ugep Cross Rivers	2 <sup>nd</sup> -22 <sup>nd</sup> August 2009
	Igwaji Aggah festival, Egbema-Omoku, Omuko, Rivers	25 <sup>th</sup> August to 3 <sup>rd</sup> September 2009
	Umunneochi Cultural Fiesta, Isiocha, Abia	16 <sup>th</sup> May 2009