



PRACTICING THE 10 PRINCIPLES

The MTN Nigeria Way

**Communication on Progress Report to the
United Nations Global Compact**



PRACTICING THE 10 PRINCIPLES:
The MTN Nigeria Way

BACKGROUND INFORMATION

Company Name	MTN Nigeria Communications Limited
Address	<i>Golden Plaza Building Falomo, Ikoyi, Lagos</i> <i>Mailing Address:</i> <i>P.M.B. 80147 Adeola Odeku Post Office Victoria Island Lagos</i>
Country	Nigeria
Telephone no	+234 803 902 0001
Web address	www.mtnonline.com
Submission date	<i>October 2015</i>
Membership date	<i>2006</i>
Number of employees	<i>3,791 permanent and contract staff (as at December 2014)</i>
Sector	<i>Telecommunications</i>
Contact name	<i>Akinwale Goodluck</i>
Position	<i>Corporate Services Executive</i>

Contents

- Nature of Business
- Executive Statement of Continued Support for the Global Compact
- The Ten Principles
- Summary of Highlights in This Report
- SECTION 1: Human Rights
- SECTION 2: Labour Standards
- SECTION 3: Environment
- SECTION 4: Anti-Corruption
- Making this C.O.P available to stakeholders
- APPENDIX 1: List of MTNN Sponsored Festivals in 2014

NATURE OF BUSINESS

We are the Leading Provider of ICT Solutions in Nigeria and West Africa...

MTN Nigeria (MTNN) provides cellular network access and ICT solutions to millions of Nigerians, connecting whole communities with each other and with the rest of the world. MTNN has led the growth in the voice market since 2001 and is now pursuing new growth opportunities in the data and ICT space. This lead position is evident in a differentiated and attractive array of product and service offerings as well as a growing bouquet of ICT products.

With over 62.8 million subscribers, MTN Nigeria remains the largest subsidiary of the MTN Group - a multinational telecommunications group offering voice and data communications products to individuals and businesses. The MTN Group has its operations spread across 22 countries in Africa and the Middle East and has recorded over 231 million subscribers.

MTN Nigeria secured one of four GSM licenses to operate digital GSM (Global System for Mobile technology) telephony by the Nigerian Communications Commission in February 2001. On May 16 2001, MTN Nigeria became the first GSM network to make a call in Nigeria and shortly afterwards, in August 2001, began full commercial operations.

MTN's commitment to providing first class network quality, customer service and value to all subscribers across Nigeria, is guided by core brand values of Leadership, Innovation, Integrity, Relationships, and a Can do attitude. For over 14 years now, MTN has continued to connect people with friends, family and opportunities, while enriching lives through a diverse range of products and services.

MTN is 75.81% owned by MTN International (Mauritius) Limited (MTNI); 19.65% held by Nigerian shareholders through special purpose vehicles; 2.78% owned by Mobile Telephone Networks NIC B.V and 1.76% owned by Government Employees Pension Fund represented by Public Investment Corporation SOC Limited.

Breaking New Grounds in Building Africa's Largest Network...

Since commencing business operations in 2001, MTN Nigeria has consistently placed a high premium on first class network quality, which is at the centre of our key value proposition to esteemed customers.

MTN Nigeria has invested over \$15 billion into the Nigerian economy since inception. We have paid taxes of over N1.4 trillion; we have created over a million direct and indirect jobs with attendant multiplier effect on the economy

In addition, the company's fibre-optic cables network which covers over 16, 000km (Backbone, Metro & NFE) across Nigeria, is perhaps the longest privately-owned fibre-optic cable ever laid in Africa and possibly one of the most modern. Presently, the MTN Nigeria network is coordinated from one hundred and twenty nine (129) switches located in 12 cities spread across the country.

Pursuing New Growth Opportunities...

Indeed, MTN Nigeria has achieved such growth that we are now an international benchmark for what can be achieved in the telecommunications industry in an emerging economy. As the company

pursues new growth opportunities in the data and ICT space, it is with the same commitment to making an impact on the lives of Nigerians.

With the rapid penetration rate of smart devices, phones and tablets in the telecoms space, there has been an explosion of mobile data traffic worldwide. Equally important is the convergence of a number of other industries with telecoms such as media, broadcasting, entertainment, IT and banking, which have provided significant opportunities in data for mobile operators in Africa.

MTN Nigeria, thus understandably, continues to invest in its 3G, WiMax and Fibre networks to take advantage of these growing data/ICT opportunities. Indeed, through the MTN Business, MTN is also at the forefront of providing reliable and dependable business communication solutions to the Nigeria enterprise market. Offering a suite of Voice, Internet, Data and Branch Connectivity Solutions, MTN Business currently serves a teeming number of corporate and public sector organisations across several industries. With continuous extensive investment in infrastructure and a focus on innovation, MTN Business is able to deploy new, flexible services and solutions tailor-made to address customers' peculiar business communication needs. Ultimately, the MTN Business team will continue to work with various partners to design and deploy solutions that are both affordable and innovative, meeting the need of Nigerians and supporting small, medium and large business enterprises across the country.

...and Still Enriching Lives!

MTN Nigeria's commitment to Corporate Social Responsibility has earned us a reputation as "The No.1 CSR Telecoms Company", and the first Nigerian mobile company to establish a Foundation. MTN continues to go the extra mile to put smiles on the faces of Nigerians through sustainable projects spanning the Education, Economic Empowerment and Health sectors, which have a high impact on the quality of life in communities across Nigeria.

To date, the Foundation has invested over 13 billion naira in executing various projects in 344 locations across the 36 states of Nigeria and the FCT.

MTN continues to make the necessary investments in telecommunications infrastructure as well as in all levels of government through the payment of taxes, levies and other statutory obligations to relevant government agencies.

Undoubtedly, MTN remains committed to adding true value to society, through corporate governance, targeted, wide-impact corporate social investment initiatives and the development of innovative products and services to empower people and enrich lives. As the company progresses with its operations, its various initiatives and projects as well as its products and services will continue to demonstrate the company's vision ***to lead the delivery of a bold, new Digital World to our customers***, propelled by a mission ***to make our customers' lives a whole lot brighter***. For more information about MTN Nigeria's products and services, please visit the MTN website: www.mtnonline.com. You can also get more information via the following social media:

www.facebook.com/MTNLoaded

www.twitter.com/MTNNG and www.twitter.com/MTN180

www.youtube.com/MTNNG

www.instagram.com/MTNNG

EXECUTIVE STATEMENT OF CONTINUED SUPPORT FOR THE GLOBAL COMPACT:



In 2014, in spite of the challenging global socio-economic business terrain, our commitment to the 10 noble United Nations Global Compact (UNGC) principles remain firm.

Indeed, the integration of sustainable business practices into our day-to-day activity continue to yield positive outcomes in ways that serve to reinforce our resolve. We believe that along with our core business values of *Leadership, Innovation, Relationship, Integrity and Can-do*, our adherence to the UNGC principles continue to help improve our operations while boosting public perception about our business.

Through its principles, the United Nations Global Compact seeks to empower society to make the right decisions and this is something that MTN firmly aligns with. We seek to achieve this laudable goal through technology, products, services and solutions designed to make life easier, more meaningful and brighter for millions of people.

Since we launched our new vision and mission statement in 2013, we have seen big changes in the way we conduct our business. We are rapidly transforming from being a traditional mobile operator to one that offers its customers a broad range of digital services through creation of new and innovative product offerings.

Guided by this change, we also remain committed to empowering the people who work with us, supporting the partners who help our business succeed, as well as investing in the communities where we operate, thus making a contributions that stimulate national development.

In all this, we are conscious of the need to uphold the UNGC principles of accountability, transparency and respect for basic human rights, while creating shared value for our stakeholders, customers, communities and employees.

This report captures our efforts in this regard in 2014. We were able to consolidate on various initiatives aligned to the 10 UNGC principles, as well as commit to setting new targets for 2015.

As I restate MTN Nigeria's commitment to the principles of the UN Global Compact, I thank our Board of Directors, Management and staff for their role in achieving the successes highlighted in this report.

Thank you and happy reading!

Michael Ikpoki
Chief Executive Officer, MTN Nigeria

THE TEN PRINCIPLES

The UN Global Compact's 10 principles in the areas of human rights, labour, environment and anti-corruption enjoy universal consensus and are derived from:

- The Universal Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention against Corruption

The UNGC Principles are listed below:

Human Rights

Principle 1: Businesses should 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

Principle 3: Businesses should uphold 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 respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater 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.

MTN Nigeria is committed to upholding these principles and the report you are about to read will outline our activities in support of these principles during the year 2014.

Summary of Highlights in This Report

Human Rights

Enhanced Employee Incentives: Continued the practice of the annual gifts, bonuses and salary reviews; and strengthened the MTNN Medical Scheme.

Sponsoring cultural celebrations: Demonstrated our commitment to Nigeria's proud heritage and warm, dynamic people, through our sponsorship of major festivals and cultural celebrations across the country.

Labour Standards

Uplifting our employees: Under the Employee Value Proposition, (EVP) we launched an online Employee Appreciation Platform, set up Staff Queries Mailbox and Revised the MTN Leave Policy. These new innovations are designed to provide employees with the right environment and culture to thrive.

Uplifting Upcoming Entrepreneurs: Empowered 505, 000 Nigerians who are now members of our MTN *Bizlift* dealer scheme.

Environment

Going Green While Staying Yello: Sustained carbon-reduction measures through enforcing stricter employee compliance with approved speed limit while using official vehicles.

Expansion of Web solutions: Introduced a host of new web solutions as an alternative to the traditional means that encourage paper usage. Some of them include the Enterprise Content Management Platform (designed to facilitate use of online signatures, hence reducing the printing of paper when approving motivations, memos, etc)

Anti-Corruption

Protecting the Business: Promoted best practice standards through staff enlightenment initiatives such as the *International fraud Awareness* week while deterring potential threats through the public announcement of *Integrity-Related staff exits*.

Protecting our customers: Updated the MTN No Gift Policy

**At MTN Nigeria, we conduct
our business with
deliberate responsibility;
recognising its enormous
impact on people, the
economy and society at
large.**

SECTION 1: Human Rights

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

Strengthening our commitment through Policy

For over a dozen years, we have enabled Nigerians connect to each other thus safeguarding a basic human right to speak freely, share ideas and access information. In this way we support economic and social opportunity as well as promote openness and transparency.

We recognise that the capacity to stay in touch can serve as a critical tool for public safety or security. We therefore strive to deliver a secure and reliable infrastructure thus ensuring that our services are always available.

Equally important is that we do not engage in ANY discriminatory practice based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability or conviction for an offence for which a pardon has been granted.

As a business, we recognize the responsibilities that come from providing communication infrastructure, products and services to a huge percentage of the populace and remain committed to upholding codes of conduct that promote fundamental human rights as defined by the Universal Declaration of Human Rights.

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

Wellness Policy, MTNN Recruitment Policy, MTNN Code of Ethics, MTNN Corporate Business Principles, Guidelines in the Conduct of Government Affairs, Conditions of Service Manual, Supplier Code of Conduct, MTNF Policy Manual.

Demonstrating our commitment through Action

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.

Promoting open communication

2014 Group Culture Audit

As a Group, MTN is committed to creating a work environment that promotes free and open communication. We recognise the importance of honest feedback in enhancing organisational growth and success.

That is why, since 2005, the MTN Group has organised an internal Group Culture Audit (GCA) survey to enable all staff provide objective feedback about the workplace without fear of victimisation.

Organised by an independent consultant, the results from this survey are treated confidentially towards ensuring total anonymity. The 2014 GCA for MTN Nigeria recorded a staff participation rate of 96% which was a rise from the 95% recorded in 2013.

The Investors in People (IIP) Accreditation

May 2014 marked the first anniversary of MTN Nigeria accreditation by the Investors in People (IiP) Governing Board, United Kingdom as an Investor in People organisation. The Investors in People (IIP) Standard is a business improvement tool designed to assist organisations achieve high performance through their people. One of the world's leading people management standards, it is a proven methodology for increased financial performance, productivity and profitability in an organisation.

The IiP accreditation provided an independent and objective confirmation that we care about our people and strive to deploy best practice people solutions/policies that make MTN Nigeria a Great Place to Work.

Indeed, through the IiP accreditation process, we had a golden opportunity to examine our people management practices and improve on the investments we make in our people. The deployment of initiatives such as the: Innovation Portal, Y'ello Careers, PMF 180 degrees Feedback and inclusion of level 1 & 2 employees in strategic business processes, are examples of some of the changes that have resulted from the IiP accreditation process.

Beyond the celebrations, MTN is currently seeking the IIP Gold Category Accreditation.

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.

Enhanced Employee Incentives

Annual gifts, bonuses and salary reviews

- Management continued its favourable practice of recognising the efforts of employees who contributed to the company's success. For the fifth year running, employees received the award of one-off household items under the **Go-Benefit** scheme. This is in addition to the end-of-year gifts and annual salary review.

Revised Staff Data and Voice Tariff Plan

Staff can now transfer different data bytes of 250MB, 500MB or 1GB to their staff or spouse voice SIMs.

UDHR Article 25(1): Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.

Improving quality of life...

- ***Empowering widows***

While the implementation of the ***Widows' Empowerment Scheme (MTNF-WES)*** started in 2013 in partnership with the Federal and State Ministries of Women Affairs, with the selection and the training of beneficiaries in business management skills; the handover of the tools of trade/equipment, business support, and mentoring and loan repayment took place in 2014. A total of 202 widows were finally selected after the screening and verification processes. This pilot phase which is approaching the end of the project life is being implemented by Growing Businesses Foundation (GBF). The 202 beneficiaries are being monitored to ensure savings culture and compliance with the loan repayment schedule. A post implementation evaluation will be conducted in 2015 to inform the way forward.

- ***Enhancing ability in disability***

MTNF Disability Support Project (MTNF-DSP) is aimed at improving accessibility and functionality of persons living with disabilities through the provision of mobility aids and appliances.

In response to the recommendations of the impact assessment carried out in 2011, the post distribution maintenance of some of the items provided in 2014 was done to ensure sustainability. Under the phase 5 of the project, the beneficiary selection process, which included the completion of Vulnerability Index Assessment (VIA) forms and verification visits for the final selection of high priority recipients, was successfully achieved.

To date, over 19,000 appliances have been distributed across the country while an estimated sum of **N955million** has been committed to the project

Taking health care to our communities

MTNF Y'ello Doctor Mobile Medical Intervention Scheme

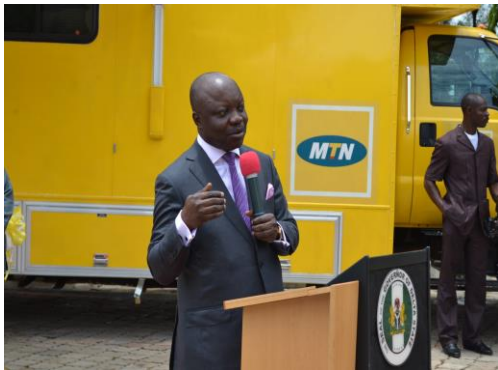
The MTNF Yello Doctor Project is aimed at increasing the access to medical care by Nigerians living in rural/peri-urban communities.

Under this project state-of-the-art mobile clinics were deployed in four states - Taraba State in February, 2014; Abia and Ogun States in March, 2014; and Delta State in April, 2014.

Each mobile clinic is provided with consumables and drugs for an initial one year period.

The project is implemented in partnership with Ministries of Health in the beneficiary states, Centre for Integrated Health Programme (CIHP) and National Primary Health Care Development Agency (NPHCDA). MTN Foundation provides funds for procuring consumables, payment of medical personnel and logistics. Centre for Integrated Health Programme (CIHP) manages the daily operation of the project, and the National Primary Health Care Development Agency (NPHCDA) has endorsed the MTNF Yello Doctor project. Medical personnel, security and other support for the project are provided by the beneficiary States' Ministries of Health.

** It is scheduled to be rolled out in Niger and Katsina States in the first half of 2015.*



Executive Governor of Delta State addressing participants the commissioning of the project in Delta State



The Ogun State Deputy Governor, inside the MTNF Mobile Clinic Truck

MTNF Sickle Cell Project:

- Under the MTNF Sickle Cell Project the Foundation has continued to contribute to the reduction of sickle cell related deaths in Nigeria through the delivery of preventive healthcare management services, essential drugs and consumables to sickle cell carriers and sufferers across the country.

Following 17th edition of the Genetic Counseling Training Course (GCTC) which held in Lagos the total number of trained healthcare workers operating across the country has now risen to 336.

UDHR Article 3 Everyone has the right to life, liberty and security of person

Contributing to Improving Security in Nigeria...

MTNF Security Support Project (MTNF-SSP) is a platform to contribute to a secured and favourable environment for lives, property and business operations across the country.

Following the kick off in 2012, MTN Foundation has provided a total of 170 fully equipped and kitted security patrol vehicles to 29 states and the Federal Capital Territory. The table below shows the snapshot of the three phases of the project at a glance. The handover ceremonies of the third phase of the project were successfully executed in the following states: Abia, Benue, Cross River, Ebonyi, Edo, Ekiti, Kwara, Niger, Rivers, Sokoto and Zamfara States. The security patrol vehicles were well received by the various State Executive Governors

Phases	Total no of beneficiary states	Total vehicles provided
One	11 and FCT, Abuja	60
Two	7	55
Three	11	55
Total	29 and FCT Abuja	170

UDHR Article 22 Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international co-operation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for his dignity and the free development of his personality.

Supporting Communities with Basic Infrastructure

In furtherance of MTNF's effort to contribute to the socio-economic development of communities where MTNN operates, the fifth phase of the MTNF Community Sponsorship project was approved by the MTNF Board of Directors in 2014.

In addition to the provision of sustainable and high impact infrastructural projects to deserving communities, the MTNF Board also approved special funds for the implementation of ad-hoc projects that will add value to communities across the country.

Consequently, a total of 30 community projects which includes provision of transformers, bore-holes, renovation of community schools/halls and hospitals across the country were approved and will be deployed by the end of quarter three of 2015.

Equally, under the Special Project, one fully kitted security patrol vehicle was provided for Ikoyi Police Station for effective surveillance and it was well received by the Police Community and the Ikoyi Community Relations Committee.



Divisional Police Officer, Ikoyi Divisional Police Station, W/SP Aishat Haruna test drives the Security Patrol Vehicle

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.

Care for Children

MTNF Orphanage Support Initiative

In continuation of MTNF's commitment to bringing succour to orphaned children, the Foundation donated food and household materials to the less privileged in orphanages across Nigeria.

MTN Foundation has consistently made donations to orphanages and hospices across the six geo-political zones of Nigeria. In 2014, as in previous years, the Foundation made donations to 60 orphanages across the country. Since inception of the initiative to date, over **N220million** has been spent to support various orphanages.



MTNN CEO Mike Ikpoki (second from right) Victor Orie-Ononogbu (Health Portfolio Manager –Left) & Adamu Umar (Coordinator Health) presenting materials to the proprietress of Arrows of God Orphanage, Ajah, Lagos



Hon. Minister of Lands, Housing & Urban Development, Mrs. Akon Eyakenyi (Left) presenting materials to proprietress Children Home, Abak, Akwa-Ibom

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.

Empowering Learning

MTN Nigeria continues to improve educational standards in the country in the following ways:

- **21 Days of Y'ello Care 2014**

MTN held its annual staff volunteer programme, 21 Days of Y'ello Care, which again focused on Education. With the theme *Investing in Education for All*, it proved a veritable platform for over **2500** MTNers to give back to the communities in the following ways:

1. Set up of 21 Digiteach classrooms in schools in Lagos, Abuja FCT, Rivers, Delta, Enugu and Oyo states - Under the project, each school received a desk top computer, internet modem, one year's internet subscription, a white board and projector. The systems were also loaded with over 70GB of educational material for Math, English Literature and Science subjects; various ICT study modules etc.
2. The Y'ello Aid Fund - MTN Nigeria Staff donated N2 million (approximately \$10,500) to support ongoing relief efforts for internally displaced persons through the provision of cash donations, food stuff, clothing, medical aid, educational materials, etc. A bulk of the Y'ello Aid funds were donated to the Chibok Scholarship for Girls which aims at relocating school girls from Chibok to other states in the country where they could continue their education.
3. Employees were equally invited to develop home grown vocational how-to videos as part of the resources used during the classroom visits. These videos were also uploaded on the 21 Days of Y'ello Care Y'ello Tutor Learning Hub

- **MTNF Science & Technology Laboratory Project, Phase 1**

In our quest to further the study of science and technology related disciplines, in 2014 the three remaining science and technology laboratories were renovated and re-equipped in three beneficiary secondary schools in Bauchi State with teachers and attendants also trained on the proper use of the facility.

To date a total of 22 laboratories have been completed and commissioned for use in Abia, Katsina, Lagos Edo, Bauchi and the FCT Abuja.

Under this initiative, the MTN Foundation provides the following to each of the Secondary Schools:

- ✓ Renovation/make-over works and provision of laboratory furniture
- ✓ Supply and installation of modern Science & Technology equipment for each subject: **Physics, Chemistry & Biology**
- ✓ One full year's supply of consumables (materials, chemicals and reagents) to the beneficiary Secondary Schools
- ✓ Training of 24 Science Teachers and Laboratory attendants across all the beneficiary schools
- ✓ Supply of a 5KVA generator to each beneficiary Secondary School and fuel supply to each school for one year.



Pictures of the Science Lab in General Hassan Katsina Memorial College, Bauchi state

- ***The MTNF Science & Technology Scholarship Scheme***

Under the MTNF Science and Technology Scholarship Scheme, the Foundation currently provides financial support to Science & Technology students in public Universities, Polytechnics and Colleges of Education across the six geo-political zones in Nigeria.

In phase 5 (2013/2014), over 7,800 applications were received from which 2,500 applicants were shortlisted for verification by the Joint Admissions and Matriculation Board (JAMB). From this number 1500 applicants were invited to sit for a Computer Based Test (CBT) at three locations across the country. After the test, a total of 500 new awardees were added to the returning 880 existing awardees to bring to a total of 1,380 recipients of the scholarships in 2013/2014.

Employability workshops were held for graduating students from the scholarship scheme on Thursday, November 27, Wednesday, December 3, and Monday, December 8, 2014, in Owerri, Abuja and Lagos states respectively.

Award ceremonies for the 500 new beneficiaries also held in Owerri, Abuja, and Lagos. In all, a total of 4,972 scholarships have been awarded by the MTNF from inception to date, and are made up as shown in the table below:

Summary of Scholarships awarded since inception.

Project/Phase	Academic Session				
Science & Tech. Scholarship (STSS)	2009/2010	2010/2011	2011/2012	2012/2013	2013/2014
Phase 1	500	451	393	221	159
Phase 2		483	367	191	77
Phase 3			255	231	188
Phase 4				500	456

Phase 5					500
Total No. of Awardees per Session	500	934	1015	1143	1380
Total No. of STSS Awards since inception	4972				



Cross section of invited guests and beneficiaries at the STSS award ceremony in Owerri

MTNF Restructured SchoolsConnect Project

MTN continues to contribute boldly to ICT and science & technology in education in Nigeria. Under the **MTNF Restructured SchoolsConnect Project** existing SchoolsConnect sites in 49 secondary schools were renovated and re-equipped for effective and focused study of three core subjects: Mathematics, English Language and ICT Appreciation.

The 49 restructured SchoolsConnect schools are located in Lagos, Enugu, Imo, Cross Rivers, Ekiti, Ogun, Kwara, Niger, Bauchi, Rivers, Kaduna and the FCT. Each school received the following from this project:

1. Replacement of all computers, servers and other appurtenances
2. Architecture enhancement to improve learning
3. Updating the content in all 49 locations.
4. Refresher courses for teachers to empower them in the use of restructured *SchoolsConnect* facilities. Two trainings interventions have already been delivered
5. Renovation of building housing SchoolsConnect sites



SchoolsConnect facility in one of the beneficiary schools in Rivers State.

PROVIDING LEARNING MATERIALS AND FACILITIES TO AID EDUCATION

- ***The MTNF Learning Facility Supply Project***

Under the phase 4 of this project, 16,000 students' desks & benches and 1,600 teachers' chairs & tables were distributed to 85 public schools, including military and police schools across the 36 States and the FCT.



Furniture being assembled at Airforce Secondary School, NAF Base, Ikeja, Lagos State

Distribution of Learning Materials

MTNF Learning Support Materials Initiative:

Over 250 public and private primary schools, secondary schools and children organisations received learning support materials such as school bags, rain coats, pencil cases, mathematical sets, learning puzzle maps, and exercise books in 2014.

These learning aids were distributed at various events during the year which includes: Children's day, Sports Day, Prize Giving Day, Religious season and end of year celebrations.

- **MTNF - MUSON Music Scholarship**

MTN Foundation partners with the Musical Society of Nigeria (MUSON) to offer scholarships to 30 talented Nigerians annually, leading to the award of a MUSON Diploma in Music after two successful academic years.

To date, 189 Nigerians have graduated from this program and have moved on to various musical careers including performance in world class orchestras, further scholarships to study at world class music schools in the US, Europe and Africa; and resource persons at premium Private and Public Schools in Nigeria. In the graduating ceremony of the 2014 class, the top three outstanding scholars were rewarded with Prizes.

The 7th set of beneficiaries of this scholarship graduated in July, 2014; while a fresh batch of 30 students were admitted in August, 2014, and will graduate in July, 2016



Cross-section of students performing during the 2014 MTNF-MUSON Appreciation concert

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.

Strengthening the ties that bind...

- ***Sponsoring cultural celebrations***

MTN continues to identify with Nigeria's rich ethnicity and cultural diversity and in 2014, we again demonstrated our commitment to Nigeria's proud heritage as warm and dynamic people, through our sponsorship of major festivals and cultural celebrations. MTN Nigeria sponsored 11 cultural festivals across the country including: Leboku; Igue Festival; Oronna Ilaro Festival; Gembu Festival and Osun Oshogbo among others.

See Appendix

Connecting to Our Customers Passions

- ***MTN Lagos Street Soccer***

As title sponsor of this popular 5-a-side street football competition, MTN uses this platform to enrich the lives of youth by connecting them to their passion for world class football, while promoting grassroots development. The competition which comprises of street teams from all the 57 local government councils in Lagos State, was designed to channel the energies of the youth constructively, thereby diverting them from negative practices which are detrimental to their future and the society.

The 2014 edition is the Seventh in the series with the expanded Under-15 category. Apart from the cash prizes, winners in the male & female categories were sponsored on a training tour to South Africa.



Koilo 2 Street Wins MTN Lagos Street Soccer 7

MTN Football Academy

The MTN Football Scholar is a youth soccer camp that focuses equally on football and academics. It provides a platform for Nigeria's best student athletes/soccer players that are academically sound to earn scholarships to American universities.

It is a scholarship program that connects MTN with the positive dreams and aspirations of Nigerian youths for international exposure in Soccer and education.

So far, a total of 21 students are currently establishing their football potentials and academic prowess in various universities in the U.S. with two more expected to join them in 2015.

**The very core of our
business is really about
empowering society...with
technology, with solutions,
with products and with
services to make life easier,
to help make it more
meaningful and to help
make it brighter.**

SECTION 2: 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

MTN Nigeria is committed to creating a conducive working environment for the over 3, **791** highly skilled men and women who contribute towards establishing the company as a successful global brand.

Through its Employee Value Proposition (the *MTN Deal*), MTN Nigeria remains committed to attracting and retaining the best talent and ensuring that recruitment and remuneration of employees is fair and transparent.

In addition, we are constantly promoting a work environment that abhors any action, attitude or policy that might in any way discriminate against our female employees. Furthermore MTNN actively collaborates with the recognised employees' liaison platform: the MTNN Employee Council.

MTNN is averse to all forms of forced labour and child labour and rigorously supports activities which prevent its occurrence. We also ensure strict adherence to age restrictions for ALL our work force, and insist that our suppliers; contractors and service providers do same in their operations.

We work to uphold the aforementioned objectives via the following policies: *the Conditions of Service Manual, Employee Council Constitution, the MTNN Code of Ethics, Supplier Code of Conduct Policy, and the MTNF Policy Manual.*

Demonstrating our commitment through Action

Empowering and Recognising our employees

- ***Enhancements to the Employee Appreciation Platform***

Positive changes were made to the Employee Appreciation Platform. The Employee Appreciation Platform was created to allow supervisors and colleagues send "thank you messages" to team members in a timely and coordinated manner.

We recognise that sincere appreciation of an employee's efforts ultimately promotes an enabling environment for achieving organisational goals. Essentially, the Platform has been enhanced to support the recognition of supervisors by their direct reports and the notification to other colleagues about the recognition, through a copy feature (Cc).

- ***Set up Staff Queries Mailbox***

MTN Staff Queries mailbox was set up to give staff direct contacts to lodge complaints/queries relating to data, voice and billing issues on their staff telephone line.

In addition, staff can also send queries/issues from families and friends to MTN Staff Queries.

- ***Revised the MTNN Leave Policy***

As an IiP certified organisation, MTNN remains committed to fulfilling specific obligations to employees, as part of continued efforts to embed the Great Place to Work agenda.

Ensuring fair leave benefits is one of the ways we achieve this, and in 2014 MTNN revised the *Leave Policy* to provide greater clarity on the administration of leave days and operational guidelines for various categories of leave.

Uplifting Upcoming Entrepreneurs:

MTN BizLift

- *MTN BizLift* is designed to engage, empower and expand the businesses of small scale retailers whilst rewarding them for landmark achievements. In 2014, the number of MTN Bizlift members grew **19%** from **424,441** to **505,000**.

**MTN's overriding objective
is to ensure that our
operations have a minimal
impact on the environment
while helping our
subscribers to stay in touch**

in more environmentally sustainable ways.

SECTION 3: 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 Nigeria continues to demonstrate its commitment to making a positive difference to the environment within which we carry out our business.

In the past dozen years, we have complied with various international environmental regulations and ensured the environmental safety of our employees, operations, locations, products/services and our communities, through strict adherence to various environmental and safety policies.

We relentlessly continue to explore avenues to partner with relevant Government, regulatory and private sector stakeholders, to promote safer, environmentally-friendly practices among our employees, partners, suppliers and customers.

Section 5 of our MTNN Code of Ethics also covers our commitment to ensuring a safe environment for employees, whilst also 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 hosted on electronic media. The policy comprises a *Safety, Health and Environmental (SHE) Policy, Hazardous Waste Management Policy and a Waste Disposal and Management Policy.*

Demonstrating our commitment through Action

Preserving the Environment

- **Compliance With Approved Speed Limit**

As part of efforts to discourage excessive use of fuel (with attendant implications on the environment) and to ensure staff safety MTN facilitated the installation of speed limit tracking devices on all official vehicles, which are used by management staff and some junior staff on official assignment. Staff buses were also fitted with these trackers.

While the speed limits are monitored to assess level of compliance and sanctions specified for defaulters, a *Speed Violation Notification Process* has been developed to enable employees proactively report any speed violation that occurs in response to an emergency and/or life-threatening situation.

- ***Expansion of Digital/Web Solutions***

The growth in electronic transaction is making it possible for more people to efficiently and effectively telecommute; transact business online and remain connected virtually.

In addition to efforts of automating various internal processes to reduce paper usage, as well as introducing some automation to our external processes, through the use of special apps and other software which will reduce the time/energy spent by customers in visiting our offices to resolve any issue.

Some of the new services include:

- ***Launched MTN Keep In Touch App (KITApp)***

The MTN Keep In Touch App (KITApp) was launched on the Mobile Device Management Solution (MDM) platform.

MTN KITApp is a mobile app for Android phone users, which provides offline access to the contact details of MTNN employees and MTNN helplines.

With MTN KITApp, staff can quickly find contact details and work information of colleagues, to call/email colleagues on-the-go. The app also allows instant calls to various MTNN help lines categorised into Help Desk, Medicals, Transport, Security among others.

Convergence Project Phase One

The Convergence Project aims to consolidate customer facing systems and portals into a singular platform, for cost management and greater operational efficiency. The consolidation will provide a 360-degree view of our customers which cuts across customer management,

invoicing and billing, product and service management, charging, credit management, payment, self-care and financial reporting.

Under this phase of the project, we had the automation of select products and services (which were previously managed manually), using converged applications and systems. They include:

- Implementation of a new billing system
- Converged customer management for Non-GSM products
- Unified hierarchy management for Non-GSM products
- Unified payment process and flexibilities for non-GSM services

These processes will be enabled through the new Agility Platform.

Signature Upload on the Enterprise Content Management Platform

In order to take full advantage of the features of the Enterprise Content Management (ECM) solution for document management and processing (preparing memos and motivations), employee personal signature was uploaded on the platform.

MTN MyIVR Revamped

MTN MyIVR (Interactive Voice Response) was revamped for enhanced functionality. MTN MyIVR now delivers easy-to-understand information via voice prompts, in the following revised areas: Account Balance details, Account information, Recharge/ Refill Account, Push GPRS Settings, Process Caller Tunez Request, Data Bundle Activation, Black Berry Activation and Service Class Migrations.

These services are available in English, Igbo, Hausa, Yoruba or Pidgin and Customers can customise their preferred services on the IVR, so that each time they dial-in, information about these services are immediately offered in their preferred language.

Get Access to SHARE: Anytime, Anywhere!

As part of continued efforts to enhance customer experience among internal stakeholders, employees can now access SHARE (the company's intranet portal) over the internet via their mobile devices and computers.

The new SHARE extranet access will provide employees with instant access to critical business information and applications wherever and whenever they need it.

Diamond Y'ello Account Debuts

MTN Customers can save money, earn interest and borrow cash when they need it - directly from their mobile phones following the launch of the Diamond Y'ello Account.

The Diamond Y'ello Account allows customers to open and operate a full bank account via their MTN mobile phones. To open an account, customers simply dial *710# and follow the prompts.

Revised Staff Phone Bill Reconciliation Process

Staff Phone Bill reconciliation process were simplified to improve the efficiency of the reconciliation process.

Following this revision, staff phone bill reconciliations will be done by logging on to the PWISE Payroll Application, effectively January 2015.

Our conviction that Institutionalised Ethical Conduct is key to the development of a vibrant private sector underscores our commitment to doing things right and at the appropriate time in all situations.

SECTION 4: Anti-Corruption

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

Strengthening our commitment through Policy

Guided by our core value of integrity, we take great care to ensure that all our employees, partners, and customers are aware of our commitment to promote ethical best practice across the business.

Integrity is at the very heart and soul of our corporate culture and is one of MTN's five brand values. It builds our reputation, distinguishes our brand and has established us as Africa's biggest network.

MTN practices a zero-tolerance policy against corruption in all forms. Several policies/practices have been put in place and disseminated to ensure compliance. Some of these policies include: *MTNN Conflicts of Interest Policy, Conditions of Service Manual, MTNN Code of Ethics, Disciplinary Process, MTN Nigeria Gifts & Donations Policy, The MTN Corporate Business Principles, Whistle Blowing Policy, Document Retention Policy, Guidelines in the Conduct of Government Affairs, Anti-Fraud and Zero Tolerance Policy, MTN Group Confidentiality Undertaking, Information Security Policy, MTNN Code of Conduct and Disciplinary Matrix, Supplier Code of Conduct Policy, Conditions of Service Manual and Employment Contract*

Demonstrating our commitment through Action

- **International Fraud Awareness Week**

MTN Nigeria joined thousands of organisations around the world to raise employees' awareness of fraud and its negative impact on organisations.

The Theme: *"Actively Collaborating to Fight Fraud and Corruption"*, speaks to our commitment to partnering effectively with our employees (in the spirit of our *Vital Behaviours*), to proactively fight fraud and protect the business from fraudulent activities.

To achieve this, a series of Fraud Awareness Roadshows were held across various MTN locations nationwide.

Encouraging "ethical conversations" amongst staff

- **Announcement of Integrity Related Staff Exits**

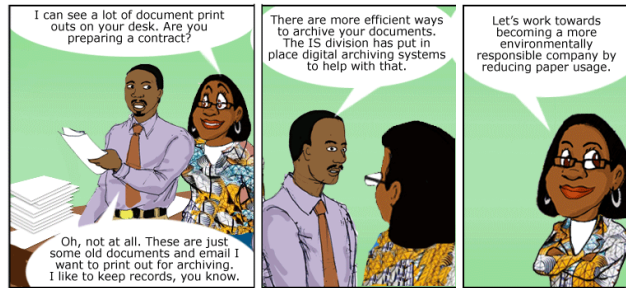
The business continued the communication of Integrity related Staff Exits on a monthly basis to reinforce MTN's zero tolerance stance on ethical misconduct.

- **The Ethica Series**

MTN continued the monthly publication of its **Ethica** educational cartoon series which was designed to provide employees with information that should enhance their understanding of MTN's ethical policies.

Some of the topics covered in 2014 included: No Gift Policy, Tip off, Corruption among others.
Examples:

THE ETHICA SERIES



THE ETHICA SERIES



THE ETHICA SERIES



THE ETHICA SERIES



Protecting our customers/Suppliers

- The MTN No Gift Policy Updated

MTN re-emphasized the “No Gift Policy” which directs employees on accepting or giving gifts to vendors, contractors, customers or any other individual or organisation.

This policy was rigorously enforced all year, especially during seasonal celebrations where such practices are liable to occur. A special publication was placed in the major national daily newspapers to drum up the point. Please see sample below:



AN ANNOUNCEMENT FROM MTN NIGERIA - OUR 'NO GIFTS' POLICY

We wish to inform all MTN vendors, suppliers and contractors that one of our core business principles is a 'no gifts' policy. This means that employees of MTN Nigeria should not demand or receive gifts from vendors, suppliers or contractors.

The only exception to this general rule is inexpensive branded or promotional items such as tee-shirts, umbrellas, stationery, notebooks, calendars and diaries. In addition, MTN staff should not accept more than one of such gifts from the same vendor, supplier or contractor within a three-month period.

Therefore, gifts such as seasonal hampers and other items that are precluded under our 'no gifts' policy will not be accepted at any of our offices or facilities. We request that our vendors, suppliers, contractors and other stakeholders should be guided by this.

MTN Nigeria is committed to promoting a business environment that is guided by the highest standards of corporate governance.

Thank you for your understanding.

Signed

Management

MTN Nigeria Communications Limited

Making this C.O.P available to stakeholders

An electronic version of the C.O.P will be made available via our Corporate intranet (for employees) and also on our corporate website (www.mtnonline.com) to be 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: List of MTNN Sponsored Festivals in 2014

S/N	Name of Festivals
1	Ihuem Eguare Festival, Edo State
2	Igue Festival, Benin
3	Osun Osogbo Festival, Osun State
4	Anioma Festival, Delta
5	Iwaji New Yam Festival, Asaba
6	Yewa Festival, Ogun State
7	Oronna Festival, Ilaro
8	Leboku Festival, Cross River
9	Awankere Festival, Warri
10	Kalankuwa Festival, Zamfara State
11	Gembu World Tourism Day, Taraba State