



# **PRACTISING 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
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Country	Nigeria
Telephone no	+234 803 902 0001
Web address	<a href="http://www.mtnonline.com">www.mtnonline.com</a>
Submission date	October 2016
Membership date	2006
Number of employees	3,503 permanent and contract staff (as at December 2015)
Sector	Telecommunications
Contact name	Amina Oyagbola
Position	Human Resources & Corporate Services Executive

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## NATURE OF BUSINESS

With over 60 million subscribers and more than \$16 billion invested so far in the economy, MTN is the largest provider of mobile network access and ICT solutions in Nigeria, connecting whole communities with each other and with the rest of the world.

Since our entry into the market in 2001, we have also remained one of Nigeria's most respected corporate citizens, with over **N1.6 trillion** paid to Government by way of taxes, levies and sundry regulatory payments till date.

Guided by our vision to lead the delivery of a bold new digital world, our leadership position in the area of network coverage, expansion and state of the art infrastructure remains constant.

Today, MTN provides network coverage to over 3,826 cities, towns and villages nationwide, offering exciting, innovative products/services that revolutionize the way Nigerians live, work and play.

Through our Enterprise Business Unit, we provide fully converged, one-stop solutions, catering to the technology needs of the public sector, corporate organisations and small businesses. With a focus on innovation and continuous investment (as epitomized in our ultramodern Tier 3-Certified Data Centre), we serve as a critical enabler for businesses.

Indeed, we are the leading provider of enabling infrastructure for virtually all sectors of the economy, most notably the Banking, Oil & Gas, SME, Entertainment and e-commerce industries.

In addition, we remain committed to our mission to make our customers' lives a whole lot brighter by providing a distinct customer experience through an extensive distribution chain comprising over 150 walk-in centres and 78 Trade Partners, with an informal distribution chain of over 600,000 sales outlets across Nigeria.

MTN is guided by a win-win philosophy – that the success and growth of the company is tied to the well-being of the people and the communities where it operates. Through the MTN Foundation, we have committed over N18 billion (since 2005) in executing various Corporate Social Responsibility projects in the areas of Health, Education and Economic Empowerment in 550 project locations across 36 states of Nigeria and the Federal Capital Territory, Abuja.

We also continue to provide employment for over 500,000 Nigerians directly and indirectly along the telecommunications value chain.

As we progress with our operations, initiatives and projects; MTN will remain at the forefront of efforts to power critical national infrastructure required to build foundations for new industries and ultimately facilitate Nigeria's inclusion in the global digital economy.

*For more information about MTN Nigeria's products and services, please visit the MTN website: [www.mtnonline.com](http://www.mtnonline.com). You can also get more information via the following social media channels:*

[www.facebook.com/MTNLoadedNG](http://www.facebook.com/MTNLoadedNG)

[www.twitter.com/MTNNG](http://www.twitter.com/MTNNG) and [www.twitter.com/MTN180](http://www.twitter.com/MTN180)

[www.youtube.com/MTNNG](http://www.youtube.com/MTNNG)

[www.instagram.com/MTNNG](http://www.instagram.com/MTNNG)

## EXECUTIVE STATEMENT OF CONTINUED SUPPORT FOR THE GLOBAL COMPACT:



In 2015, in spite of a very challenging business environment, MTN remained committed to the 10 noble United Nations Global Compact (UNGC) principles remain firm. It is this commitment that prompted our membership, *ab initio*, of the UNGC among other related organizations.

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 we continued to implement new ways to integrate sustainable business practices into our day to day activity.

This has helped us continue 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 significant contribution to Nigeria's socio-economic development.

As we do this, we remain 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 2015. 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!

*Ferdi Moolman,*  
**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 2015.

## Summary of Highlights in This Report

### Human Rights

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

**Sponsoring cultural celebrations:** Again, 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:** Enhanced the Employee Appreciation Platform (MTN SHINE), the MTNN Medical Scheme, and the MTN Wills Service. These are core components of our Employee Value Proposition designed to provide employees with the right environment and culture to thrive.

**Uplifting Upcoming Entrepreneurs:** The **505, 000** MTN *Bizlift members* were re-classified to boost their productivity and enhance profitability.

### Environment

**Going Green While Staying Yello:** Sustained carbon-reduction measures through enforcing strict compliance with approved speed limit and maintenance of the staff bus route system.

**Expansion of Web solutions:** Restructured the *Quarterly Rollover of Unused Staff Data*, revamped the *Diamond Y'ello Account (DYA)* and the *Next Level Y'ello Directory Staff Referral Programme!* These are just some of the way we are encouraging more active use of web solutions as an alternative to traditional means that encourage paper usage.

### 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



**We subscribe to the philosophy that the best business is that which employs a win-win approach, such that as the company grows, it simultaneously contributes to the sustainability of the socio-economic development of its environment. For us at MTN Nigeria, there is really no other way to do good business than to do it responsibly.**

## 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**

Since 2001, we, like no other private firm, have enabled Nigerians to connect to each other and indeed with the rest of the world. This connection effectively safeguards the basic human right to speak freely, share ideas and access information. In this way, we essentially support economic and social opportunity as well as promote openness and transparency.

As a business, we recognise that the capacity to stay in touch can serve as a critical tool for public safety and/or security. We therefore endeavour to deliver a secure and reliable infrastructure one that ensures that our services are always available.

In addition, 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.

We recognise the immense responsibilities that come from providing communication infrastructure, products and services to a huge percentage of the populace and remain committed to upholding the 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, but are not limited to the following:

*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**

#### **2015 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 2015 GCA for MTN Nigeria recorded a staff participation rate of 98% which was a rise from the 96% recorded in 2014.

### ***The Investors in People (IIP) Accreditation***

In May 2015, MTNN achieved the Gold Category 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 Gold Category 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.

Undoubtedly, in preparing for the Gold accreditation process, we had a unique opportunity to examine our people management practices and improve on the investments we make in our people.

*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 and salary reviews***

- Management continued its favourable practice of recognising the efforts of employees who contributed to the company's success. While the award of one-off household items under the **Go-Benefit** scheme did not take place in 2015, staff nevertheless benefited from the end-of-year gifts and annual salary review.

*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...***

- ***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.

Following the successful verification and selection of high priority recipients for the fifth phase of the project, the second cycle of the project continued progressively with the distribution of the mobility aids and appliances to over 3,500 verified beneficiaries during the fourth quarter of 2015 in the following 12 states: Abia, Bauchi, Edo, Enugu, Gombe, Katsina, Kogi, Kwara, Rivers, Ogun, Ondo and Zamfara. The items distributed in the fifth phase included the cerebral palsy chair for children. To date, over 24,000 appliances have been distributed across the country.

Again, MTN (via its social investment vehicle, MTNF) demonstrated its continued support for efforts by the government (through the Federal Ministry of Women Affairs & Social Development) to enhance the social inclusion of Persons With Disabilities (PWDs). It collaborated with the Ministry to commemorate the annual **International Day of Persons with Disabilities** with the theme “*Inclusion Matters: access and empowerment for people of all abilities*”.

The commemorative event took place on December 3, 2015 with presentations and an exhibition of various empowerment initiatives by PWDs. In addition, there was a call to all stakeholders to contribute to the empowerment of PWDs.



*Wife of Deputy Governor of Ondo State presenting a tri-cycle to a beneficiary*



*Her Excellency, the first lady of Enugu State presenting a braille machine to a beneficiary*

- **Enhancing The Social Inclusion Of Hearing Impaired Persons**

**The MTNF Hearing Aid Support Project** got the approval of the MTNF Board of Directors to become a stand-alone initiative in 2015; it had hitherto been a component of the MTNF Disability Support Project. It is aimed at providing 1,500 Hearing Aid to hearing impaired {i.e. Hard of Hearing (HOH)} persons ((including children from six months old) in 6 States in Nigeria. The goal is to contribute to the inclusion of the hearing impaired people into the society and thus enhance their participation in social and economic activities.

Implementation of this pilot phase in the six target states - Akwa Ibom, Anambra, Bauchi, Benue, Katsina & Lagos commenced fully in 2015 with the administration of hearing assessment forms to potential beneficiaries. MTNF team worked collaboratively with the relevant supervisory

ministries, proprietresses of special homes, Local Government and teaching hospitals to ensure maximum involvement of hearing impaired persons across the six pilot states.

*The input from the hearing assessment forms will be analysed and selected beneficiaries will be shortlisted for audiometric assessment exercise during the first quarter of 2016, while distribution of fully programmed digital hearing aids and supplementary batteries will be done during the second quarter of 2016.*

### ***Taking health care to our communities***

**The MTNF Yello Doctor Project** is aimed at increasing the accessibility of Nigerians living in rural/peri-urban communities to primary healthcare interventions through the mobile clinic platform. The Project adopts the Public Private Partnership (PPP) approach with MTNF providing project funds for the procurement of the mobile clinics, consumables and engaging the Centre for Integrated Health Programme (CIHP) as project consultants while the National Primary Health Care Development Agency (NPHCDA) who is the endorsing body of the project. The beneficiary States provide the required medical personnel, security and general support for a successful project implementation.

The project is already being implemented in Taraba, Abia, Ogun & Delta States. The project was commissioned in Katsina State on September 2, 2015 by the Executive Governor, Alhaji Aminu Bello Masari. He received the MTNF Y'ello Mobile Clinic on behalf of the state. The project is yet to be commissioned in Niger State.

With this project, MTN identifies with the National goals of providing universal and quality health care to Nigeria while also assisting government in strengthening health systems and infrastructure in the country



*Project truck ready for cutting the tape*



*The Executive Governor, Katsina State, Alh. Bello Masari*

*The*

**The MTN EyeRIS Project phase 1** benefited a total of 33,364 people with 10,610 cataract surgeries, 11,946 glasses and 10,808 drug packs distributed in six states across the country namely: Abia, Delta, Niger, Sokoto, Jigawa and Osun States.

Following the success recorded in phase 1 of the intervention, the MTNF Board of Directors approved for the phase 2 of the project to be implemented in **Ogun, Imo, Ondo, Kwara, Akwa-Ibom and Ekiti States.**



In 2015, the project was successfully completed in Ogun, Imo, Ondo, Kwara and Akwa-Ibom States. Ekiti State is pending. So far a total of 28,311 people have benefitted from the intervention comprising of 8,311 cataract surgeries performed, 10,000 glasses and 10,000 drug packs distributed.



*Screening of a patient during the intervention in Imo State      Screening of a patient during the intervention in Ondo State*

**MTNF Maternal Ward Support Project** seeks to contribute to better access to health care for pregnant mothers in Nigeria by renovating and equipping 24 selected maternal wards in six states across all the geo-political zones

The project commenced with the publication of an expression of interest in national newspapers. A total of 21 State Ministries of Health applied out of which 13 States were shortlisted for verification. The verification visit to the 13 shortlisted States has been concluded

Verification visits were conducted to the following States from August 25 to September 8, 2015: Abia, Cross River, Rivers, Bayelsa, Edo, Kogi, Benue, Niger, Kaduna, Kano, Sokoto, Ondo & Oyo

This intervention aligns with the Millennium Development Goals of reducing child mortality and improving maternal health

Through this intervention, MTN continues to demonstrate its commitment to helping Nigeria to achieve these goals but will also be perceived as working with Government in improving the standard of the health sector in Nigeria

*\*The project will be commissioned in third quarter of 2016*

*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 (What Can We Do Together)**

Launched as part of activities to commemorate the tenth anniversary of the MTN Foundation, the success it recorded has made the Board of the MTNF make it a regular part of the foundation's efforts *to improve the quality of life in our communities*.

The ***What Can We Do Together*** is a "give-back" initiative to connect with Nigerians. The goal is to get Nigerians to nominate MTNF projects/interventions they consider of utmost importance to their particular communities. To ensure it is all inclusive, nominations can be made through various channels including the web, SMS, USSD, and MTN Walk-in centres across the country.

Under the first phase of this initiative over thirty thousand nominations were received and following a rigorous selection process, 200 projects have since been implemented in 200 communities across the country. Each community, each nominator, each project was a worthy story.

*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**

MTN through the Foundation continued to support orphanages and hospices across the six geo-political zones of Nigeria through donations of food and household materials to the less privileged in orphanages across Nigeria.

In 2015, a year-end fun filled party tagged "MTNF Endless Party" meant to extend the joy of the period to the children and their minders was organized at various locations within the country. The party created a platform for social interaction which involved among other things; Kiddies talents hunt competition, Entertainment, Games and Gifting.

Guests at the events included Governors' wives or their representatives, Permanent Secretaries from Ministries of Women Affairs, Directors etc.





*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 2015**  
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 **2000** MTNers to give back to the communities in the following ways:
  1. **Digital e-Learning Facilities** - installed computer systems pre-loaded with education materials, in collaboration with our implementing partner, **iServeWeb** in 12 schools and 6 MTN locations across the country to drive access to digital learning and demonstrate the value of education via non-traditional media.
  2. **Train-the-Teacher Project** – aimed at granting teachers access to relevant electronic learning materials via a digital learning portal hosted on our social media platform
  3. **Y'ello Tutor Project** – created an Online Library accessible to students in primary and secondary schools across the country, replete with learning resources of all the subjects of the entire Junior and Senior Secondary School Syllabus.



4. **Fund Raising (Y'ello Aid) Campaign** - This activity aligns with our cultural value of giving as a way to empower others. Funds were raised through donation and deployed in partnership with NGOs for educational materials and scholarships towards helping orphans, displaced and physically impaired persons located in educationally disadvantaged areas and camps for Internally Displaced Persons (IDP) affected by the activities of insurgents.
- ***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 6 (2014/2015), over 13,000 applications were received from which 2,500 applicants were shortlisted for verification, out of which 1500 applicants were invited to sit for a Computer Based Test (CBT) organised by the Joint Admissions and Matriculation Board (JAMB) at 3 locations across the country. After the test, a total of **500 new awardees** were added to the returning **1022 existing awardees** to bring to a total of **1,522 recipients** of the scholarships in 2014/2015. In all, a total of **6,318 scholarships** have been awarded by the MTNF from inception to date.

***Employability workshops*** were again held for graduating students from the scholarship scheme on Monday, December 7, Thursday, December 10, and Tuesday, December 15, 2015, in Lagos, Owerri and Abuja respectively.

Award ceremonies for the 500 new beneficiaries also held in Owerri, Abuja, and Lagos states on Tuesday, December 8, Friday, December 11, and Wednesday, December, 16, 2015.



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



*MTNF Employability workshop at Abuja*

## ***PROVIDING LEARNING MATERIALS AND FACILITIES TO AID EDUCATION***

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

Under phase 5 of this project, 9,700 students' desks & benches and 970 teachers' chairs and tables were distributed to 95 public schools, including military and police schools across the 36 States and the FCT.



*Government Secondary School, Kubwa, Abuja 2*



*Methodist School, Edem Idim, Ibakesi 2*

### ***Distribution of Learning Materials***

#### **MTNF Learning Support Materials Initiative:**

Over 200 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 2015.

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, **211 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 2015 class, the top three outstanding scholars were rewarded with Prizes.

The 8th set of beneficiaries of this scholarship graduated in July, 2015; while a fresh batch of 30 students were admitted in August, 2015, and will graduate in July, 2017



*Cross-section of students performing during the 2015 Graduation concert*



*Graduating students*

- **The MTNF-Oracle ICT Skill-Up Project**

The MTNF-Oracle ICT Skill-Up Project is online project, in partnership with Oracle Academy. It is targeted at adding value to the already existing MTNF Science and Technology scholarship by giving fifty (50) existing **300** level scholars the opportunity to be trained on Database and JAVA fundamentals.

In addition, one beneficiary also had the opportunity to participate in an intensive nine week IT Training at CERN headquarters in Geneva, Switzerland.

Following a rigorous shortlisting process of over 1500 applicants, Mufutau Akuruyejo, a beneficiary of the MTNF Science & Technology Scholarship Scheme, was selected as the first Nigerian to attend the all-expense paid, CERN 9 week summer workshop, at Geneva, Switzerland

*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. In 2015, we again demonstrated our commitment to Nigeria's proud heritage and warm, dynamic people, through our sponsorship of major festivals and cultural celebrations annually. MTN Nigeria sponsored 11 cultural festivals across the country including: Leboku; Igwe Festival; Oronna Ilaro Festival; Gembu Festival and Osun Oshogbo among others.

***See Appendix***

***Connecting to Our Customers Passions***

- **MTN Golf Tournament 2015!**

Since 2002, as part of our continuous efforts to forge a stronger bond with our customers, clients, trade partners and all stakeholders, MTN Nigeria has remained a major sponsor of various local and international golf tournaments.

Indeed, we have supported such tournaments as the MTN Golf Classic, the International Pairs, the Nigeria Cup and the World Golfer Championship which have featured thousands of golfers from over 40 countries.

The MTN Golf Tournament held in 2015 represented another significant step towards sustaining this relationship as well as contributing to the development of golf in Nigeria. The tournament held in three cities: Lagos, Abuja and Port Harcourt.

There was also a special golf clinic for non-golfers.

**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, 503** highly skilled men and women whose commitments and contributions are the bedrock of the company's success.

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

- ***The CEO Y'ello Manager Award***

The very first set of CEO Y'ello Managers emerged from across the business following nominations by their subordinates (direct reports). 176 managers were nominated from which 13 were selected to receive the CEO Y'ello Manager Award.

The "CEO Y'ello Manager Award" was designed to recognize and reward managers and team-leads that practice the four cardinal points of the MTNN People Management Framework (Know Me, Focus Me, Guide Me, Recognise Me).

- ***Employee Appreciation Platform***

It is now an open secret that recognition is at the core of an engaged workforce. MTNN employees were constantly encouraged to take advantage of the digital recognition platform, MTN Shine.

With MTN Shine, employees have the right platform for effective recognition on-the spot and on-the-go. Tagged giving 'Kudos', it is designed to encourage team recognition by providing every team member with a timely and meaningful way to recognize the great work done by their peers every day.

- **MTN Wills Service**

In line with our EVP promise, under the *Total Reward and Recognition pillar* of the *MTN Deal*, the MTN Wills Service was introduced in 2012 to support employees who may feel apprehensive about this form of planning and unsure about how to proceed.

This unique service is designed to assist employees in proactively planning the affairs of their estate (assets, properties, funds, investments, etc.), in order to maximize the value transferred to beneficiaries and minimise loss due to claims, potential financial setbacks and forced liquidation of assets.

Employees were again encouraged to take advantage of this service.

- **Enhancements to the MTNN Medical Scheme**

In line with our continued efforts to ensure qualitative healthcare delivery to employees and their dependants, the company introduced **enhancements to the MTNN Medical Scheme**.

The company updated the list of Immunization Centers, restructured the change Of Hospitals and Health Maintenance Organizations (HMO) to twice yearly, established Chronic Disease Management at Centers Of Excellence, and set up 24/7 Contact Phone Numbers For Critical Rescue International (CRI).

## **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 2015, the number of MTN Bizlift remained at **505,000**.

There was however reclassification of some *BizLift* members as Digital Boss (Structured Communication Outlets) and Smart Retailers.

**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 continued to facilitate 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:

- **Next Level Y'ello Directory Staff Referral Programme!**

MTN's bold new move to transform and move Small and Medium Enterprises (SMEs) in Nigeria forward using technology moved up a gear with the launch of the Y'ello Directory. This is a free online listing for SMEs where they will have an opportunity to enjoy a bundle of SME-tailored solutions. Through this initiative we are creating the biggest community of SMEs in West Africa.

Employees as ambassadors were for a four weeks period encouraged to direct and assist SMES to join the network with opportunity to get N10, 000 gift vouchers for 10 employees each week for the four weeks period.

### **Diamond Y'ello Account (DYA) Revamped**

The ease of opening and operating a REAL savings bank account (with monthly interest) by dialing \*710# using an MTN registered SIM on any mobile phone is well documented.

Customers can also earn loyalty points each time they use the DYA for transactions and these loyalty points can be redeemed as airtime.

The DYA can be funded through the following channels; At MTN Walk In Centers (Service Centres & Connect Lites), DYA to DYA Transfer, Transfer from Other Banks into a DYA, All Diamond Bank Branches and DYA Agents Network.

### **Restructured the Quarterly Rollover of Unused Staff Data**

The Quarterly Rollover of Unused Staff Data was restructured to enable staff optimize use of this important staff benefit.

**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 for over 10 years.

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**

In 2015, MTN Nigeria again joined the global effort to minimize the impact of fraud by promoting anti-fraud awareness and education.

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.

A series of Fraud Awareness Roadshows were held across various MTN locations nationwide to drive home the significance of

- **Information Security Awareness Week**

To curb the incidence of cybercrime in the light of rising connectedness spurred by the growing dependence on internet, it is important that we understand how to navigate the digital space securely and safely.

Information Security Awareness Week, aimed at providing information to ensure proper handling of sensitive company information, the implications of information security breaches and ways to mitigate such occurrences was held across the organization.

In addition to roadshows, there was Information Security Awareness Quiz with prizes for the lucky winners and educational series on information system (IS) security tips.

## ***Encouraging “ethical conversations” amongst staff***

- **Ethics Management Quiz**

An ethics management quiz competition was organised to help employees stay up-to-date on MTN Nigeria ethics-related policies, processes and procedures. The goal was essentially to boost the firm’s collective task of embedding a culture of ethics across the organization.

- **Announcement of Integrity Related Staff Exits**

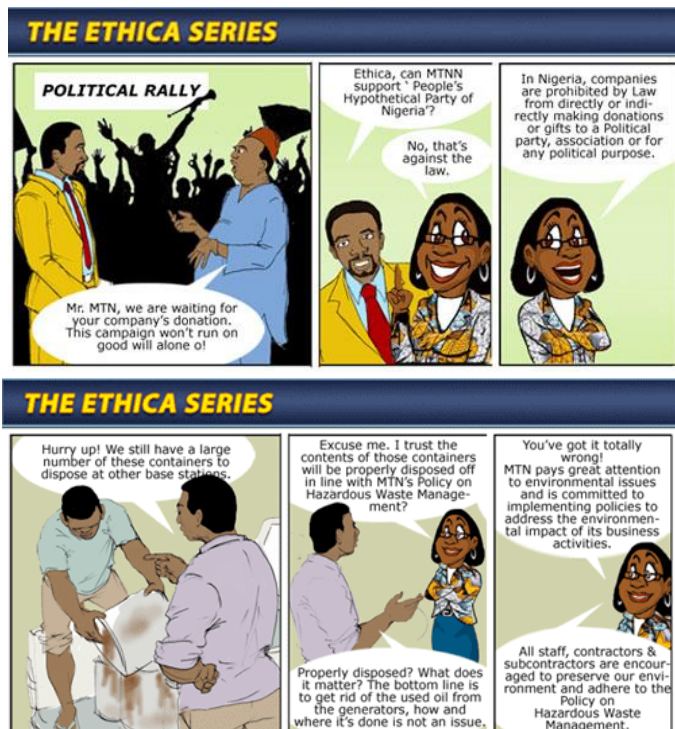
The business continued the communication of Integrity related Staff Exits on a monthly basis to reinforce MTN’s zero tolerance stance on ethical misconduct. Integrity related staff exit emails were sent out in March and October 2015.

- **The Ethica Series**

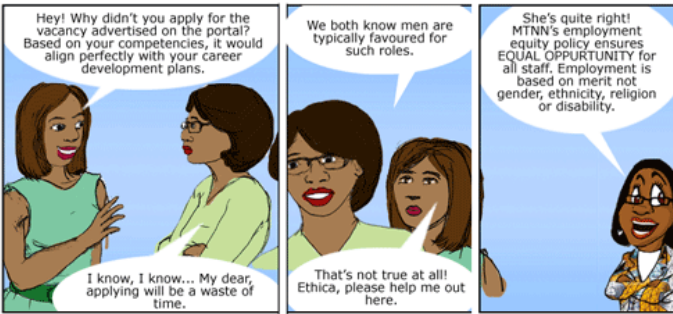
MTN continued the monthly publication of its **Ethica** educational cartoon series designed to provide employees with information that should enhance their understanding of MTN’s ethical policies.

Some of the topics covered in 2015 included: Conflicts of Interest, Anti-Bribery & Corruption Policy, Environmental Responsibility, Gender Equality, Delegation of Authority, Confidentiality/Non - Disclosure of Information, Gifts/Hospitality/Favours, Guidelines on Conduct of Governmental Affairs among others

### **Examples:**



## THE ETHICA SERIES



## THE ETHICA SERIES

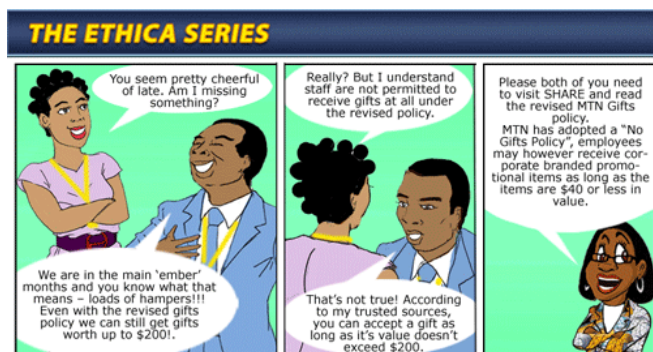


## THE ETHICA SERIES



## THE ETHICA SERIES





### ***Protecting our customers/Suppliers***

- **The MTN No Gift Policy**

MTN reiterated its commitment to 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 rigourously enforced all year, with particular emphasis during the seasonal celebrations where such practices are more liable to occur.

### **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](http://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 2015**

<b>Festival</b>	<b>Location</b>	<b>Date</b>
Osun Osogbo	Osogbo, Osun State	Aug 17-21
Leboku	Ugep, Cross River State	Aug 24-27
Badagry	Badagry, Lagos State	Aug 24-29
Igwaji Aggah	Egbema/Ndoni, Rivers State	Sept 3-5
Nupe	Bida, Niger State	Oct 15-17
Mambila Gembu	Taraba State	Sept 23-28
Hawan Sallah	Kano	Sept 24-28
Oronna	Ilaro, Ogun State	Nov.24-Dec. 2
Igue	Benin City, Edo State	Dec.16 -24