

MTN Uganda Sustainability Report 2024



MTN



**Doing for
tomorrow,
Today.**

y'ello!

*Together, our
commitment
is unstoppable.*

Skyline image
of **Kampala**
city





Our Commitment to Sustainable Growth

MTN Uganda Limited presents its inaugural independent Sustainability Report for 2024, marking a pivotal milestone in our journey toward creating shared value across Uganda. As the country's leading telecommunications operator, serving over 22 million customers more than half of Uganda's adult population we recognise our profound responsibility to drive sustainable development while delivering exceptional connectivity and digital services.

This report demonstrates our commitment to integrating Environmental, Social, and Governance (ESG) principles into our core business operations. This commitment is guided by the belief that it benefits our clients, our business, and the planet, aligning with our strategic vision to provide world-class telecommunications and digital solutions. We are inspired by the belief that everyone deserves the benefits of a modern, connected life.



This inaugural Sustainability Report marks a pivotal milestone in our journey to create shared value across Uganda, reaffirming MTN Uganda's commitment to sustainable development, responsible business, and the belief that everyone deserves the benefits of a modern, connected life.



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Our Story

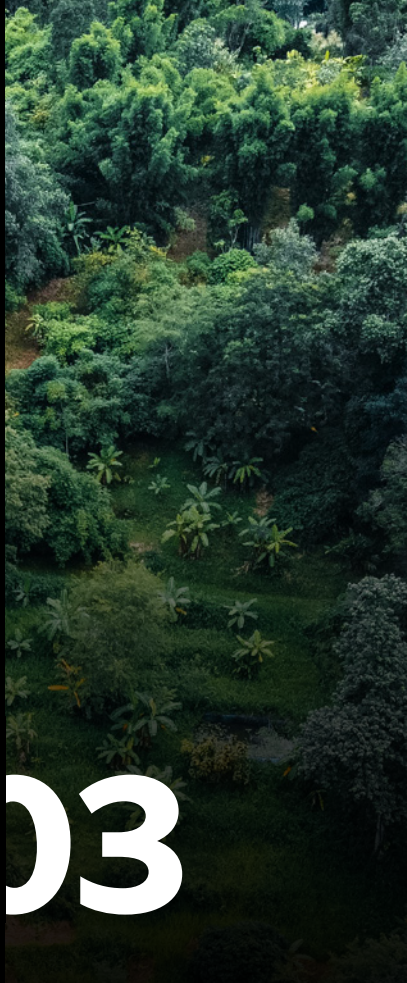
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*From telecommunications
pioneer to sustainable
development catalyst.*



22m

Customers countrywide as
end of 2024

About this Report: Creating Shared Value

The MTN Uganda Sustainability Report 2024 is our inaugural independent report, highlighting the progress and milestones the company has achieved over the years in creating shared value across the country. At MTN, we recognise the impact of our business on society and the environment. Consequently, we have embarked on a journey towards sustainable operations in the long run. This inaugural report highlights MTN's commitments and standards, providing details on the performance of its environmental, social, and governance obligations. The goal is to create long-term shared value for all stakeholders.

We understand the responsibility of operating a business that is consciously evolving by integrating ESG factors into our strategic

business operations, stakeholder engagement, and service delivery. We aim to provide accountability to our stakeholders while ensuring that we meet the highest standards of service delivery, aligning our efforts with local and global expectations within our industry.

This report outlines our sustainability goals and progress for the period from January 1, 2022, to December 31, 2024, and provides context into MTN Uganda's initiatives, developments, and future outlook across identified ESG thematic areas. It is structured around our four pillars, which draw from the MTN Group's Sustainability Strategy and Commitments. This report, however, does not highlight MTN Group disclosures and is specific to MTN Uganda operations

Global Reporting Framework Integration



The Integrated Reporting Framework



International Financial Reporting Standards (IFRS)



Global Reporting Initiative (GRI standards)



International Sustainability Standards Board (ISSB) – under IFRS



Sustainable Development Goals (SDGs)



This is our inaugural independent sustainability report, highlighting our commitments and setting us off on our journey to the adoption of the IFRS S1 and S2 Sustainability Disclosure Standards.



Leading Uganda's Digital Transformation Through Sustainable Excellence

Chairman, Board of Directors 's Statement

It is with great pride that I present MTN Uganda's Inaugural Sustainability Report for 2024, marking a defining moment in our commitment to creating shared value across Uganda. As Chairman of the Board, I am privileged to witness MTN's evolution from a telecommunications provider to a catalyst for sustainable national development.

Since MTN Uganda's incorporation in 1998, we have grown to serve over 22 million customers, more than half of Uganda's adult population. This remarkable reach comes with profound responsibility to contributing to a more sustainable tomorrow for our customer base and country of operation. Having a clear vision of where we would like to be and the steps we are making to get there is crucial for our success alongside defining the relevant steps to achieve our goals under **Ambition 2025**. Our Board recognises this and affirms that sustainable business practices are not merely compliance requirements but fundamental drivers of long-term value creation for all stakeholders.

On this journey, we navigate continuous change and new challenges, but our determination to progress along it, is consistently strong. Various new developments have shaped the context of our sustainability activity over the years. We operate in a rapidly evolving space with changes from regulatory landscapes to climate change and environmental compliance. We are committed to staying on top of the changing tides and optimizing the impact that we have – and will have – on the societies, environments, and economy where we are present.

Under our robust governance framework, the Board has provided strategic oversight to ensure ESG principles are embedded and compliance is evident throughout our operations. Our commitment extends from regulatory compliance to embracing voluntary sustainability disclosure, while demonstrating transparency and accountability that reflects our responsibility as a listed company and industry leader. We will continue to enhance our capabilities to fulfill the existing and future needs of our customers.

Charles Mbire

Chairman, Board of Directors

Our commitment as the Board

The Board's dedication to sustainable governance is evidenced through our comprehensive risk management frameworks, our commitment to the highest ethical standards, and our systematic approach to stakeholder engagement. We have maintained rigorous oversight of management's execution of our sustainability strategy while ensuring alignment with Uganda's national development priorities and international best practices.

Our sustainability strategy is anchored on four pillars — Doing for the Planet, Doing for People, Doing it Right, and Doing for Growth — reflecting the Board's vision for integrated value creation. Through Project Zero, we are pioneering the adoption of renewable energy in Uganda's telecommunications sector. Our digital inclusion initiatives are bridging the connectivity gap that has historically limited opportunities for millions of people in Uganda.

The MTN Foundation, which receives 1% of our annual after-tax profit, exemplifies our commitment to community development. Under the Board's guidance, this investment has delivered measurable impact across education, healthcare, and youth empowerment, directly supporting Uganda's Sustainable Development Goals.

A glimpse of the future

As we look toward 2030, the Board is committed to strengthening our ESG governance through enhanced oversight mechanisms, integrating sustainability metrics into executive performance frameworks, and adopting international reporting standards, including IFRS Standards S1 and S2. We recognise our current ESG maturity as "pragmatic" and are implementing systematic transformations to achieve integrated sustainability excellence.

This inaugural report represents more than just a documentation of our current activities; it signifies our commitment to stakeholders for transparent and accountable progress toward a sustainable future. The Board remains committed to ensuring that MTN Uganda's commercial success creates demonstrable positive impact for our customers, communities, investors, and the nation.

As we advance our **Ambition 2025** strategy and prepare for the beyond-2025 horizon, the Board will continue to champion sustainability as integral to our business model, ensuring that every Ugandan can benefit from a modern, connected life while preserving our environment for future generations.

Under our Board's stewardship, MTN Uganda is transforming from a telecommunications company into a platform for sustainable national development, where business excellence and societal progress advance together.

Delivering on Our Promise: Creating Shared Value Through Digital Innovation

Chief Executive Officer's Statement

I am honoured to present MTN Uganda's inaugural Sustainability Report, a testament of our commitment to creating shared value while delivering world-class telecommunications, digital and financial solutions that transform lives across Uganda.

In 2024, we achieved remarkable milestones that demonstrate how sustainable business practices drive both commercial success and societal progress. We expanded our network coverage therefore connecting more Ugandans to opportunities than ever before, reinforcing our position as a champion for sustainable growth.

Our operational commitment is the belief that everyone deserves the benefits of a modern connected life. We are not just building infrastructure; in our service delivery we are creating pathways to economic empowerment and social progress creating shared value for all Ugandans.

“Our operational excellence is measured not only by our financial performance but by our contribution to Uganda's sustainable development, because everyone deserves the benefits of a modern connected life.”

Sylvia Mulinge

Chief Executive Officer

Environmental Leadership Through Project Zero

Through Project Zero, our homegrown energy efficiency and carbon reduction program, we have implemented comprehensive renewable energy solutions across our network. In 2024 alone, we completed solar installations and grid connections across 3,339 sites which is 77% of our total site stations; achieving a 58.4% reduction in Scope 1 and 2 emissions while maintaining service excellence. Our commitment to Net Zero by 2040 positions MTN Uganda as a leader in Uganda's transition to sustainable energy practices.

Our Project Infinity circular economy initiative has transformed how we manage resources, extending equipment lifecycles and minimizing waste. As a result, MTN Uganda has donated e-waste worth UGX 20 million to Makerere University College of Engineering, Design, Art and Technology for responsible recycling, reuse, and disposal. The donation includes 66 monitors, 134 desktops, and 90 laptops, which will be revamped and given to rural secondary schools to enhance ICT access and literacy.

Empowering Communities Through Digital Inclusion

Our CHASE framework continues to address the five key barriers to mobile internet adoption across Uganda. In partnership with device financing collaborators, we increased smartphone penetration from 39.1% to 44.9%, ensuring that cost is not a barrier to digital participation. Our digital literacy programs reached 4,795 youth, while the MTN Internet Bus facilitated 1,216 community outreaches, bringing digital skills directly to underserved areas.

The MTN Foundation's impact expanded significantly in 2024, establishing 35 Community ICT Resource Centres that now serve 16,000 learners. These initiatives reflect our understanding that connectivity alone is insufficient; we must also build digital capacity

and literacy to ensure that every Ugandan can thrive in the digital economy. Through these initiatives we are having a positive impact on society and working to provide tangible solutions to the challenges that are at the heart of our clientele.

Innovation for Financial Inclusion

MTN MoMo's evolution into a comprehensive financial ecosystem demonstrates our commitment to democratising financial services. We disbursed approximately UGX 1.5 trillion through MTN MoKash, tripling our 2023 lending volume and providing millions of Ugandans with access to formal financial services. The launch of Market by MoMo in November 2024 represents our next frontier, connecting local merchants to global markets and accelerating Uganda's digital commerce growth.

Our 212,500 MTN MoMo agents and growing network of merchants form the backbone of Uganda's financial inclusion infrastructure, ensuring that even the most remote communities have access to secure, affordable financial services.

Operational Transformation and Future Readiness

As we transition from basic ESG awareness to systematic integration, we are committed to integrating sustainability thinking into every operational decision. In 2024, our ESG maturity was ranked 'pragmatic,' affirming transparency, alignment with global standards, SDG commitment, and long-term leadership.

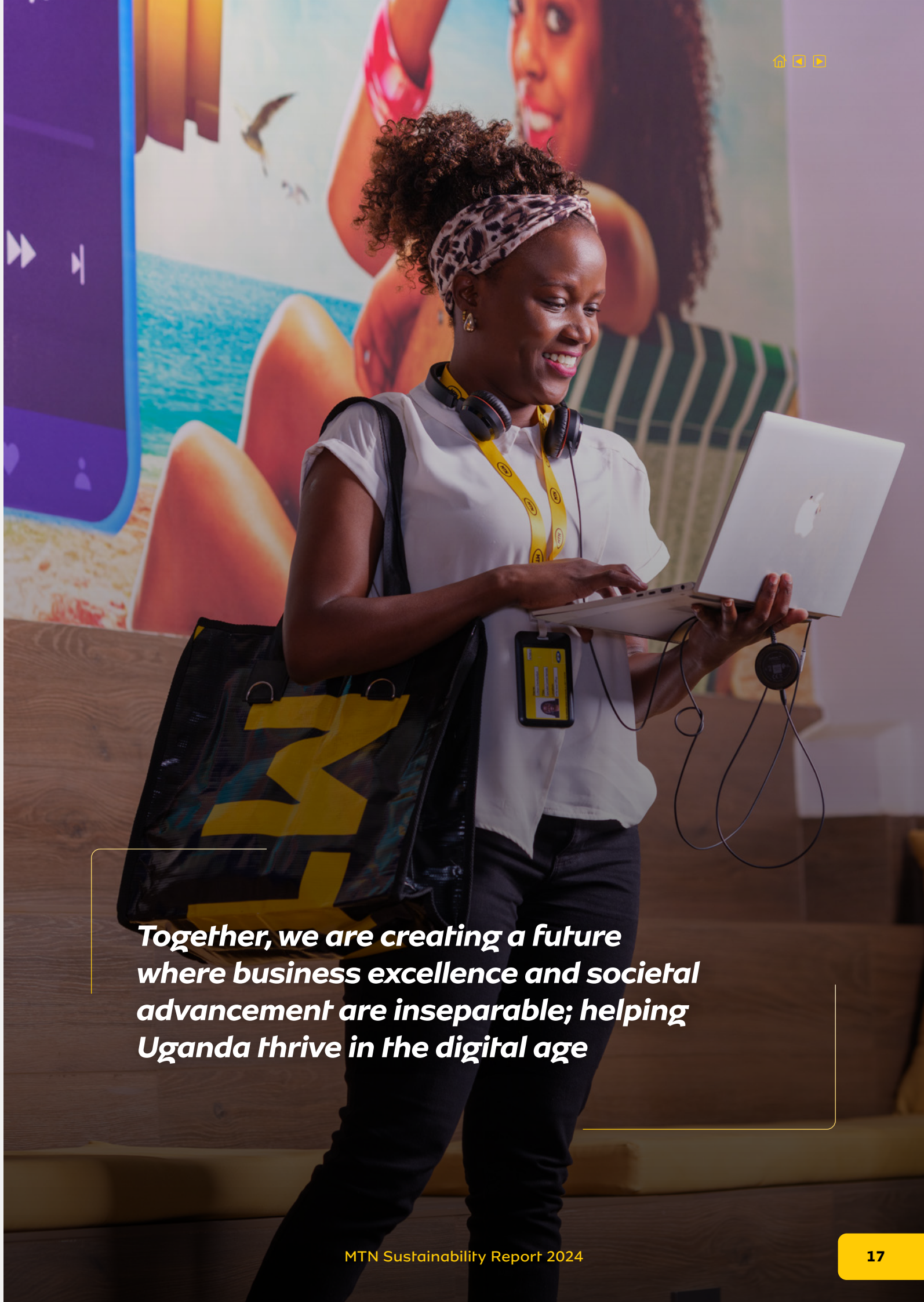
We are implementing comprehensive changes, including the establishment of a dedicated ESG Steering Committee, the adoption of IFRS S1 and S2 sustainability disclosure standards, and the development of robust Environmental and Social Management Systems. These initiatives ensure that our commitment to sustainability is not aspirational but operational.

A Promise for the Future

Looking ahead to 2030, we will continue to expand our renewable energy initiatives, deepen our digital inclusion programs, and strengthen our governance frameworks. Our goal to increase local supplier participation from 63% to 75% demonstrates our commitment to Uganda's economic development. At the same time, our continued investment in the MTN Foundation ensures sustainable community impact.

This inaugural sustainability report marks the beginning of a new chapter in MTN Uganda's story, one where business excellence and societal advancement are inseparable. Every network expansion, every digital inclusion initiative, and every environmental improvement reflects our core belief that sustainable business practices create the foundation for lasting value creation.

Together, we are not just connecting Uganda; we are empowering Uganda to thrive in the digital age while preserving our environment and communities for future generations.



Together, we are creating a future where business excellence and societal advancement are inseparable; helping Uganda thrive in the digital age

About Us

Company Foundation and Growth

MTN Uganda Limited is the leading telecommunications operator in Uganda, incorporated on October 21, 1998. Twenty-six years later, we have evolved into the country’s leading telecommunications operator. The company’s strategic vision is to provide world-class telecommunications and digital solutions for Uganda, driven by the belief that everyone deserves the benefits of a modern, connected life.

From its first customer, MTN has grown to a subscriber base of approximately 22 million, or over half of the country’s adult population. MTN has a presence in all 134 districts of Uganda and has evolved into a telecommunications company providing an innovative range of products and services, including voice, data, digital, and mobile financial services, delivered through a network of approximately 212,500 mobile money agents, 1,140 service centers, and 14 leading distributors.

MTN is committed to improving the lives of the communities in which it operates, having dedicated 1% of its annual profit after tax to the MTN Foundation (a semi-independent entity through which MTN directs its social investment activities) since 2007, thereby impacting millions of Ugandan lives. The company has contributed to the growth of the telecommunications sector in Uganda since its inception, with current penetration reaching 70%.

Our journey represents more than business growth—it embodies our transformation from connecting people to empowering lives, from providing services to creating opportunities, and from building networks to building communities.

Our country of operation is Uganda, and we are also part of the wider MTN Group based in South Africa, which operates in other countries across the African region.

“Our journey represents more than business growth—it embodies our transformation from connecting people to empowering lives, from providing services to creating opportunities, and from building networks to building communities.”

Our Business Offering

Our core purpose at MTN Uganda, rooted in our **Ambition 2025** Strategy, is to enable the benefits of a modern connected life. Our customer-centered growth approach aligns with this strategy.

Our approach to customer experience management focuses on ensuring our services are easy, personal, in control, and connected. We are committed to prioritising customer needs, ensuring fairness, and deepening trust through transparent business practices by adhering to compliance procedures and global standards, such as the Financial

Conduct Authority’s Treating Customers Fairly Framework.

MTN Uganda’s business model delivers innovative products and services across three distinct segments: Consumer, Enterprise, and Wholesale. The business service lines covered include voice, data, digital, MoMo, wholesale, and enterprise business. This customer segmentation approach is based on cultivating deeper knowledge and relationships with each respective segment and designing appropriate solutions and platforms that drive growth within each segment.



Consumer

We offer tailored services and products to different groups of consumers based on their needs. The key groups we target are high-value users, the mass market, and youth, to whom we offer tailored mobile and fixed telecommunications services, encompassing voice, data, and digital services.



Enterprise

Our enterprise segment offers data and voice, as well as products and services, that address the specific needs of small, medium, and large enterprises, as well as public sector institutions.



Wholesale

Through Bayobab Uganda, we provide neutral, open-access digital infrastructure services, ensuring high-quality connectivity for telecommunication operators, hyperscalers, and digital service companies. Bayobab is our fibre assets vehicle.

Our Core Services



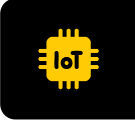
Mobile and Fixed Telecommunication

MTN Uganda offers both mobile and fixed-line communication services, encompassing voice and data services.



Mobile Money (MoMo)

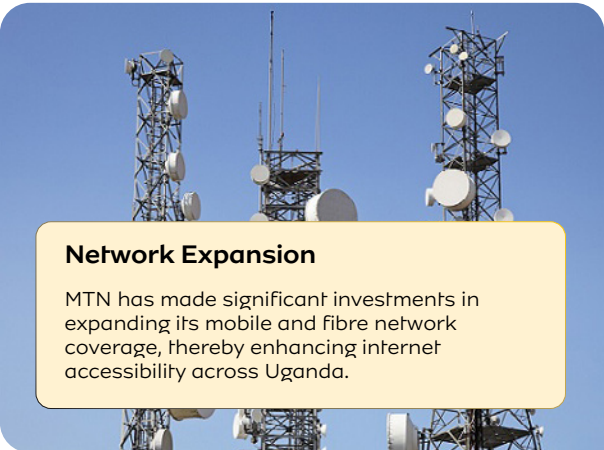
MTN Mobile Money is a significant service that revolutionises financial inclusion in Uganda by providing access to digital payments and financial services.



Internet Service Provisioning

MTN offers internet services through both mobile and fixed connections, contributing to increased internet accessibility.

Our Digital Transformation Initiatives:



Network Expansion

MTN has made significant investments in expanding its mobile and fibre network coverage, thereby enhancing internet accessibility across Uganda.



Support for National Digital Projects

MTN has supported various national digital transformation projects, including the First National Digital Census and Digital Agent Payments.



4G and 5G Deployment

MTN is actively deploying 4G and 5G technologies to create a dynamic digital ecosystem.



ICT Expo

MTN organises the annual MTN ICT Expo to showcase the latest technological innovations and their impact on businesses and society.

Our Business Solutions Services:

- ▶ **MTN Business:** MTN Business offers a range of ICT solutions to various businesses, including converged ICT services, cloud services, unified communications, cybersecurity, IoT, and fleet management.

Our Corporate Social Responsibility:

- ▶ **MTN Foundation:** MTN Uganda dedicates 1% of its annual after-tax profit to the MTN Foundation, which supports various community development initiatives. The MTN Foundation's mission is to improve the quality of life in communities where MTN Uganda operates in a sustainable manner.

MTN Foundation's Corporate Social Investment portfolio focuses on the thematic areas of Youth Empowerment and the National Priority Areas of Education and Health. This Corporate Social Investment portfolio aligns with the United Nations' Sustainable Development Goals (SDGs), Uganda's national priorities outlined in the National Development Plan, and the MTN Group's CSI Policy.

Our Recent Developments:

- ▶ **Listing on Uganda Securities Exchange:** MTN Uganda became the largest local listed company on the Uganda Securities Exchange in 2021.
- ▶ **Separation of Mobile Money Business:** MTN Uganda is in the process of structurally separating its mobile money business (MTN MoMo) from its core telecom operations.



Key Achievements and Impact 2024

Our business delivers a sustainable impact in our country of operation by expanding digital and financial services, including smartphone access, with a strong track record of promoting sustainable societies and overall economic value-added. This demonstrates our commitment to being efficient and responsible today while building a strong foundation for the future.

Performance Highlights



Environmental Progress

- ▶ **8.5% reduction** in scope 1 and scope 2 emissions in 2024
- ▶ **80% of our suppliers** by spend committed to setting science-based targets by 2026
- ▶ **592 Grid and solar connections** across our network and base station sites



Digital and Financial Inclusion

Data subscribers from 8.2 million to **10.1m**

Extended fibre coverage from 12,072 to **17,774km**

Contribution to UCUSAF from UGX 36 billion to **UGX 42.5bn**

Total Infrastructure Investment **UGX 418bn**

Facilitated 4.3 billion MTN MoMo transactions valued at **UGX 158.6bn**

Disbursed approximately UGX 1.5 trillion in loans through MTN MoKash **UGX 1.5tn**



Sustainable societies

- 16,000 learners**
Established 35 Community ICT Resource Centres impacting 16,000 learners
- 4,795 youth**
Trained over 4,795 youth through digital literacy programs
- 1,216 digital literacy**
Facilitated digital literacy outreaches impacting 1,216 people
- Infrastructure development**
Supported infrastructure development impacting hundreds of learners in schools across Uganda

- UGX 4.6 billion**
Increased our total corporate social investment from UGX 4.4 billion to UGX 4.6 billion
- 1,323 employees in 2024**
Number of employees: 1,323 (2023: 1,349)
- 48.4% women in our workforce**
Percentage of women in our workforce: 48.4%
- 38.0% women in senior management**
Percentage of women in senior management: 38.0% (2023: 38.0%)



Economic value add

- UGX 980.2bn**
Increased our local supplier spend from 804.7 billion to UGX 980.2 billion
- 71.9%**
71.9% of supplier spend on local suppliers within our value chain
- 1,242 Local Suppliers**
Local Suppliers – 1,242 (63.02% of total suppliers)
- UGX 73.6bn**
Increased our spend on women suppliers and women-led businesses from UGX 42.4 billion to UGX 73.6 billion

- Over 300 suppliers**
Partnered with over 300 suppliers to create a more resilient, sustainable, and ethically responsive supply chain
- 300,298 indirect employment**
Indirect Employment (created within the Economy) FY24 – 300,298
- UGX 1.273tn**
Made tax contribution of UGX 1.273 trillion
- ISO 9001 2015**
Received our ISO 9001: 2015 certification, which reflects our rigorous quality assurance in logistics management



Awards

Winner

Best Listed Entity Reporting Award at the Institute of Certified Public Accountants of Uganda 2024 Financial Reporting Awards

Winner

Presentation and Communication Award at the Institute of Certified Public Accountants of Uganda 2024 Financial Reporting Awards

Winner

Consumer and Industrial Products Financial Reporting Category at the Institute of Certified Public Accountants of Uganda 2024 Financial Reporting Awards

Million Dollar RACE (Risk Audit Compliance and Ethics) Award

Best OpCo of the Year, MTN Global Leadership Gathering Group President and CEO Award – **Y'ello** Care, MTN Global Leadership Gathering

Diamond Award

Technology Services Digital Excellence, Digital Impact Awards Africa, Best accelerated bookbuild in Africa – MTN Uganda’s UGX 220 billion accelerated bookbuild (EMEA Finance)

Diamond Award

Financial Services Digital Excellence, Digital Impact Awards Africa

Value Based Capital Allocation



Our Strategy: Ambition 2025

Ambition 2025 frames our strategic focus, ensuring that we continue to evolve and remain connected to the needs, aspirations, and challenges of our stakeholders while harnessing opportunities to create and preserve value for them. The objective of **Ambition 2025** is to accelerate growth responsibly by unlocking the value of our infrastructure assets and platforms.

Our sustainability strategy, derived from **Ambition 2025**, is embedded within the organisation across four pillars: eco-responsibility, sustainable societies, sound governance, and economic value-add. Each pillar is constructed around deliberate policies and procedures that enable swift and accountable implementation commensurate with our commitment to achieve results.

The three central factors in measuring the sustainability of our company are considering the impact we have on our stakeholders and business environment, including our support for the government of Uganda's targets. Together, they form the Environmental, Social, and Governance (ESG) architecture. This is the core of our strategy, which is also aligned with our work to advance the national commitments in our country of operation and the United Nations' Sustainable Development Goals.

MTN is dedicated to advancing digital equity and financial inclusion as catalysts for sustainable development. Our sustainability framework centres on creating shared value that benefits both MTN and our stakeholders through responsible environmental, social, and governance practices.

Our approach extends beyond conventional ESG models by integrating economic value creation as a core pillar alongside traditional ESG considerations. This comprehensive framework ensures that the financial benefits we generate are distributed among our stakeholders, creating a measurable socio-economic impact across the communities we serve.

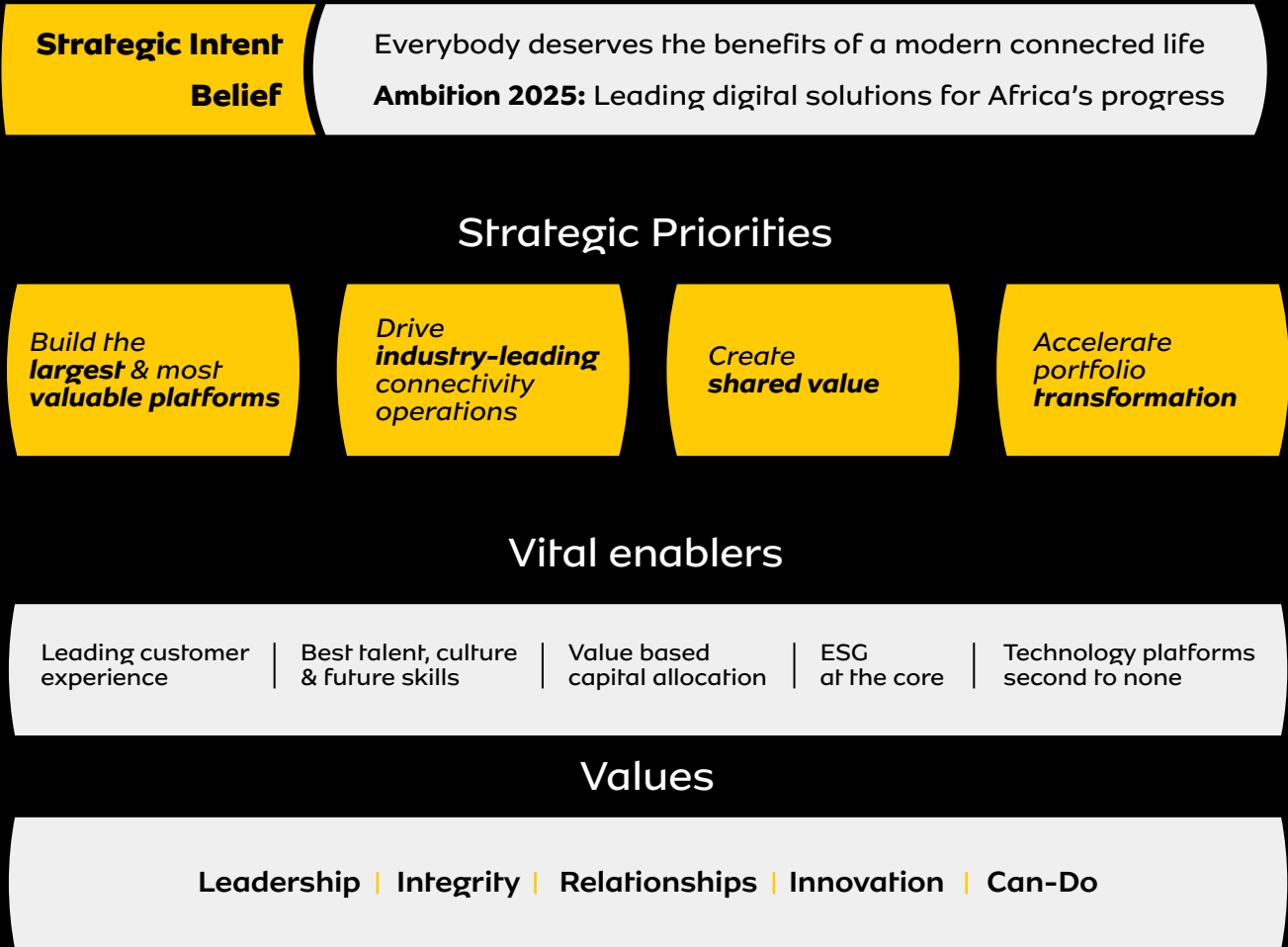
By connecting underserved populations to digital services and financial tools, we are not just building telecommunications infrastructure; we are creating pathways to economic opportunity and social progress. Our commitment is to measurably reduce barriers to digital participation while generating sustainable returns that fuel continued investment in community development.

Through this integrated approach, MTN transforms connectivity into a driver of inclusive growth, where business success and societal advancement mutually reinforce each other.

Our Ambition 2025: Leading digital solutions for Africa's progress' is driving accelerated growth and faster deleveraging, positioning MTN for greater relevance to 2025.

Ambition 2025 Overview

Our strategic priorities frame the four areas we need to excel in to realize our vision for 2025.





Visualising the Terrain: Our Commitment to Transparent Disclosures

GM Corporate Services' Statement

As MTN Uganda, we are committed to transparently disclosing our sustainability performance at all levels. Guided by MTN Group's ESG Framework and Ambition 2025 strategy, we are committed to creating shared value and ensuring that the benefits of a modern connected world reach every Ugandan.

The Board of Directors, supported by the Remuneration, Social and Ethics Committee (REMCO), provides strategic oversight to ensure that our disclosures reflect integrity, accuracy, and completeness. The Board confirms that this report accurately represents MTN Uganda's environmental, social, and governance (ESG) performance for the reporting period.

We are committed to transparently disclosing our sustainability performance at all levels.

Enid Edoma
General Manager:
Corporate Services and
Company Secretary

Our ESG approach is anchored on three core pillars:

Environmental Stewardship

We are actively working to reduce our carbon footprint and improve energy efficiency across our operations. Initiatives such as the deployment of solar-powered network sites and energy optimisation projects contribute to MTN Group's goal of achieving net zero emissions by 2040.

Social Impact

We are driving digital and financial inclusion through initiatives like MTN MoMo, which expands access to financial services, and MTN Foundation programmes that focus on youth empowerment, education, and health. Partnerships with local communities continue to strengthen our role in creating shared value.

Governance & Ethics

Strong corporate governance underpins our operations. We comply with international reporting standards, including IFRS and GRI, and are preparing to adopt the IFRS S1 and S2 sustainability disclosure standards. Our commitment to ethical business practices is reinforced through robust data protection frameworks, anti-bribery policies, and transparent stakeholder engagement.

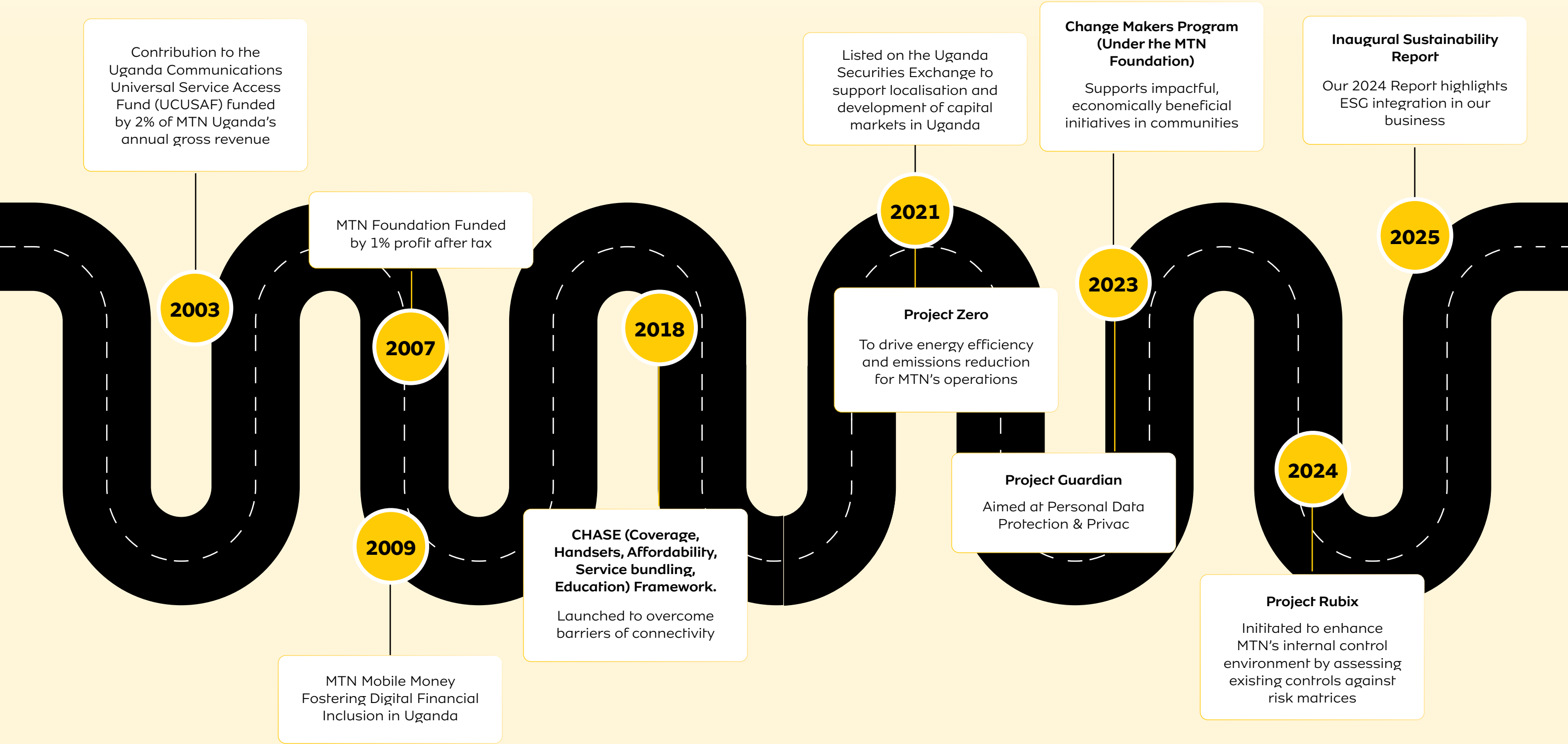
Our Commitment

Consensus building across the Board, management, and throughout the organisation is pivotal. We are defining concrete actions and expectations for each department to embed these sustainability principles into our operations. Moving forward, our focus is on developing specific goals, initiatives, measurable key performance indicators (KPIs), and timelines aligned with our purpose – the benefits of a modern connected world. This includes a rigorous assessment of risks related to data collection and analysis, critical for mapping out our roadmap and effectively executing our ESG metrics.

We are dedicated to building strong connections with our consumers and the public by offering valuable experiences in all our business operations and services, ensuring the benefits of a modern connected world are a fundamental aspect of life. Inspired by innovation, reliability, and a forward-thinking vision, we strive to remain relevant and beneficial to all our stakeholders.

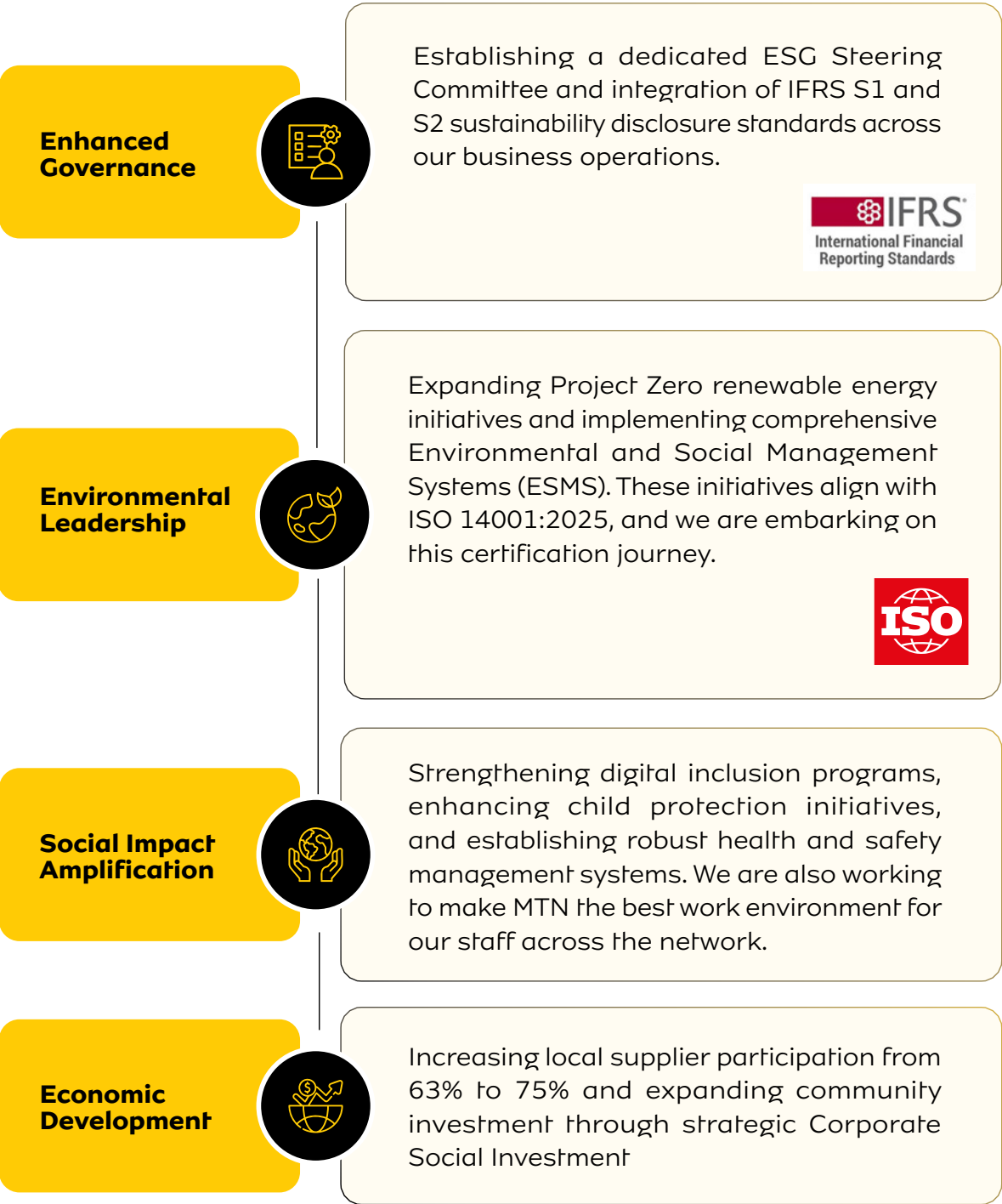
MTN Uganda is committed to raising its profile as a champion for sustainability. We will continue to demonstrate the resilience, purpose, and drive that have characterised our work for the past 20 years.

Key Sustainability
Milestones:



Future Outlook: 2025-2030 Strategic Priorities

Our forward-looking strategy addresses current ESG maturity assessments and growth strategies while establishing systematic integration across all operations. Key priorities include:



02

*Integrated Strategy
Through Four
Interconnected Pillars*

Our Framework

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Sustainability Framework Overview

Sustainability is at the heart of MTN’s mission. As Uganda’s leading telecommunications operator serving over 22 million subscribers, we focus on creating value while addressing the country’s significant challenges in education, healthcare, and infrastructure.

Our commitment to sustainability is built on four pillars that guide us in integrating sustainability into everything we do: environmental stewardship, social responsibility, ethical governance, and economic resilience.

Strategic Intent

Belief

Everybody deserves the benefits of a modern connected life

Ambition 2025: Leading digital solutions for Africa’s progress

Doing for planet

Doing for people

Doing it right

Doing for growth

Commitments

"We are committed to protecting our planet and achieving net zero emissions by 2040"

"We are committed to driving digital and financial inclusion and diverse society"

"We are committed to driving digital and financial inclusion and diverse society"

"We are committed to partners and stakeholders to create and protect value"

Metrics & Actions

Project Zero Reduce greenhouse gas emission

Efficiency Improve energy efficiency

Project Zero Reduce greenhouse gas emission

Generational equality Increase women representation and equitable inclusion

Increase access & reduce cost to communicate

Increase financial inclusion

Contribution through ICT Digital education, skills & jobs

Responsible policies & practices Including business ethics and enterprise-wide risk management

Enhance reputation & trust with stakeholders

Digital human rights

Responsible procurement & supply chain

Tax contribution across markets

Network infrastructure investment

Local content

SDGs

Sustainability is central to MTN Uganda’s mission. We serve over 22 million people with purpose and impact. Our strategy addresses education, health, and infrastructure gaps.

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Together, we’re Unstoppable

MTN Sustainability Report 2024

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Materiality

Material matters are those issues that could affect our ability to create value in the short-term, medium-term, and long-term. These matters influence our strategy and how we manage our associated risks, as well as the opportunities we explore due to these factors. In 2023, the MTN Group launched and conducted a group-wide Materiality Assessment, highlighting the key issues crucial to our business operations. The MTN Group now conducts an annual material assessment to continuously evaluate the most substantial issues that could affect the value we create over time and our ability to deliver our strategic intent.

In our approach to defining material information, we recognise the interconnectedness between our operations, the environment, and society. Our business model is influenced by both the impact we have on the external environment and the external factors that affect our operations. These Impacts can be both positive and negative, and we must carefully consider their implications for our business model. Considering our operating context, we recognize that the importance and significance of material information vary.

Our management team carefully assesses and prioritises these issues to ensure effective decision-making. This enables the groups to identify key matters with a significant bearing on the financial value of the company (financial materiality) as well as the significant impacts of our business operations on people, the community, and the environment.

Managing Materiality at MTN Uganda

ESG risk management forms a cornerstone of MTN Uganda’s comprehensive sustainability strategy. While we maintain alignment with MTN Group’s overarching materiality framework, we have customised our risk management processes to address the distinctive challenges and opportunities within Uganda’s unique operating environment. This localized approach ensures our sustainability efforts deliver maximum impact while remaining directly relevant to the specific complexities we encounter.

Our proactive methodology enables us to systematically identify, assess, and mitigate ESG-related risks in accordance with the Group’s ESG risk strategy, thereby safeguarding both our business operations and stakeholder interests. This comprehensive risk management approach is overseen by our REMCO board committee, which provides strategic guidance to our Corporate Services, Risk, and Compliance division.

Through this integrated governance structure, we maintain robust oversight of our materiality management processes while ensuring that local insights and global best practices work together to strengthen our ESG performance and risk resilience. Our goal is to conduct a materiality assessment tailored to our MTN Uganda operations, which will complement the group-wide efforts to ensure that we focus our resources and energy on resolving matters key to our business and stakeholders.

Here, we provide an overview of the material matters identified by the MTN Group Materiality Assessment 2023:

Associated Sustainability Issues	
 Geopolitical and macroeconomic conditions	• Economic and socio-political challenges in our communities • Maintaining positive and collaborative stakeholder relationships
 Complex regulatory & tax	• Compliance with country and industry regulations • Social and environmental compliance • Tax compliance
 Network and platform performance	• Network availability and service reliability • Rising demand for digital and fintech services • Energy consumption, supply and transition to renewable energies • Reducing emissions
 Financial resilience	• Affordable data connectivity • Creating shared value • Supporting local economies • Requires consideration of the impact of socioeconomic stresses and responses on the overall Group financial sustainability
 De-layering of the telecoms business model	• Digital and financial inclusion
 Greater focus on ESG	• Environmental stewardship • Enabling financial and digital inclusion • Ethical supply chain management • Supporting local economies • Creating shared value
 Future-fit skills & culture	• Employee engagement • Developing future-ready skills • Advancing diversity and inclusion • Gender equality and pay parity • Health, safety and wellbeing
 Cyber security & digital safety	• Protecting customer privacy and data security • Cybersecurity • Protection of customer’s digital human rights
 Governance, Ethics and risk management	• Maintaining robust corporate governance • Effective stakeholder engagement and collaboration • Business conduct and ethics • Managing sustainability-related risks and opportunities
 AI	• Navigating new technologies responsibly, while leveraging transformative opportunities

Key Initiatives in 2024



Our Commitment: We are committed to protecting our planet and achieving Net Zero emissions by 2040.

Initiatives	Our Progress	SDGS
▶ Project Zero	Emissions reduction – 8.5% Scope 1 and Scope 2	 



Our Commitment: We are committed to driving digital and financial inclusion and a diverse society.

Initiatives	Our Progress	SDGS
▶ CHASE Framework	8.2 to 10.1Mn data subscribers - Fibre coverage from 12,072 to 17,774km	
▶ Financial Inclusion – MOMO	4.3Bn MTN Momo transactions	
▶ Yello Values – Our People	1,349 Employees 48.4% Women in our workforce	  
▶ MTN Foundation	- UGX 4.6Bn towards CSI 4,795 Youth trained in digital literacy	   

Key Initiatives in 2024



Our Commitment: We are committed to partners and stakeholders to create and protect value.

Initiatives	Our Progress	SDGS
▶ Reputation Index	Maintained a score of 84%	
▶ Customer privacy and Data security	ISO 27001:2022 Information Security Management	
▶ Ethical Supply Chain Management	- ISO 9001:2015 Quality Management Systems - ISO 37301:2021 Compliance Management Systems	



Our Commitment: We are committed to boosting inclusive economic growth on the continent.

Initiatives	Our Progress	SDGS
▶ Tax Compliance	UGX 1.273tn tax contribution	  
▶ Network Infrastructure	UGX 418.0bn invested in the network and IT infrastructure	
▶ Local Enterprises	71.9% local suppliers spend from UGX 804.7bn to UGX 980.2bn	  



Stakeholder Engagement Framework

Part of managing materiality requires increased engagement with our stakeholders and building meaningful relationships that enable us to gather insightful feedback, which is crucial to establishing a strong foundation for our sustainability approach. We strive to work closely with our stakeholders to ensure their active participation in building a sustainable MTN Uganda brand that meets the current and future needs of our consumers. We strive to be the partner of choice to our nation-state hosts, communities, suppliers and stakeholders in Uganda. Informed consultation and stakeholder participation are vital enablers for our value-creation efforts.

Our stakeholder management policy promotes the greater inclusion of stakeholder needs, interests, and expectations in corporate decision-making, recognising the critical fact that best practice requires MTN to have a stakeholder engagement policy in place to guide our approach to communicating, working with, and interacting with stakeholders. Within the framework of this policy, we map key stakeholders, plan engagement proactively and keep a record of official engagements. Stakeholder input is vital in enabling MTN Uganda set ESG priorities and aligning goals, which identify the most critical ESG

issues impacting our business operations. By engaging stakeholders, MTN Uganda can make informed decisions, align ESG initiatives with stakeholder expectations, and enhance transparency. We have taken key steps towards communicating our commitments and targets to our stakeholders.

We ensure sustainable supply chain management through our Supplier Code of Conduct. This code outlines our commitment to ethical business practices, human rights, fair labour standards, environmental protection. With our partners, we are keen to communicate our commitments as stated across our Ambition Strategy 2025. This ensures that in our business and operations with key stakeholders there is a meeting of minds and a willingness to uphold MTN Uganda’s goals towards creating shared value.

We acknowledge that this is a critical pillar of our mission to create shared value. We aims towards bringing all our stakeholders and players along with us on this journey. This will involve a review of our existing stakeholder engagement framework to identify prospects for the integration of communication and feedback processes for our sustainability strategy.

Voluntary Disclosure

This MTN Uganda Sustainability Report is based on voluntary sustainability disclosure, demonstrating our commitment to transparency and continuous improvement. This journey has enabled company-wide learning, particularly in understanding what to report, how to collect accurate data, and how to set clear goals that align with our strategy.

Through this process, MTN Uganda has identified key areas to improve as we work toward fully integrating ESG accountability and reporting into our core business. Our commitment to transparency, therefore, informs our ESG performance and enhances our reporting. MTN Uganda intends to assign ESG-related Key Performance Indicators (KPIs) and matrices as part of its future outlook, which will be approved at all levels for implementation.

Key Areas of Focus:



03

Our Impact

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***Demonstrating Measurable
Progress Across Our
Sustainability Pillars***



Safeguarding the Value of the Planet.

MTN is committed to climate action through its **Project Zero strategy**, reducing Green House Gas emissions via energy management, efficiency improvements, and operational enhancements—ensuring connectivity while minimizing environmental impact as part of our sustainability agenda.





Safeguarding the Value of the Planet.

Climate change is an integral part of our sustainability agenda, and MTN recognises the need to keep our customers connected while taking measures to reduce our carbon footprint through our **Project Zero strategy**. This strategy focuses on reducing Green

House Gas (GHG) emissions across our value chain through emissions reduction initiatives, energy management solutions, improved energy efficiency, and enhanced operational efficiencies.



Strategic Environmental Objectives

Our Commitment

To contribute to the reduction of GHG emissions by reaching a 50% reduction by 2030 and Net Zero by 2040 through alignment with the Science-based Targets Initiative (SBTi).

Goals	We will achieve our goal by:
Increasing Renewable Energy and Energy Efficiency measures across MTN operations to 45% by 2030.	▶ Leveraging the latest technologies for use in operations to optimise consumption. ▶ Leveraging energy management solutions to ensure energy efficiency across our operations.
Reducing Scope 1 and 2 GHG emissions by 50% by 2030	▶ Deploying more efficient technologies which optimise energy consumption ▶ Improving efficiencies and redesigning processes ▶ Engaging and incentivising our suppliers to commit to achieving Net Zero
Decreasing absolute Scope 3 GHG emissions from fuel and energy related activities by 50% by 2030	▶ Engaging and incentivising our suppliers to commit to achieving Net Zero ▶ Ensuring 80% of our suppliers by spend will have science-based targets by 2026.

Project Zero

MTN initiated Project Zero in 2021 to mitigate Scope 1 and 2 emissions and enhance energy efficiency, aligning with the global objective of limiting the temperature increase to **1.5°C**. This initiative has successfully implemented cleaner energy solutions, resulting in demonstrable reductions in emissions.

Renewable energy projects are a main source of new energy power generation in Uganda. The country has abundant solar, wind, and hydropower resources, which are being harnessed to provide clean and reliable electricity, reflecting its progress in the renewable energy sector. According to the International Renewable Energy Agency

(IRENA), Uganda had 1,067 megawatts (MW) of installed renewable energy capacity in 2020, which accounted for **25%** of the country's total installed capacity. Another area of focus for Uganda's energy sector is improving energy efficiency; currently, the amount of energy consumed per unit of GDP in Uganda – is one of the highest globally.

This is partly due to the country's reliance on inefficient technologies and practices. Improving energy efficiency has the potential to reduce energy costs for households and businesses, while also lowering Green House Gas emissions.



Project Zero was launched in 2021



To contribute to global efforts to limit the global temperature rise to 1.5°C in fulfilment of Article 4 of the Paris Agreement.



We align Project Zero with Uganda's Nationally Determined Contributions (NDCs) for 2022 and the Uganda National Climate Change Policy 2015.



And we leverage innovative technologies to harness and utilise renewable energy sources, thereby limiting our environmental impact.

Project Zero is our in-house energy efficiency and carbon reduction program, to achieve greater energy efficiency and emissions reduction.

Our vision is to promote environmentally conscious business practices and reduce emissions across our operations in Uganda.

MTN is responding strategically to the call in the Energy Policy for Uganda 2023. This policy prioritises renewable energy in addressing modern energy demand and encourages the private and public sectors to integrate these goals into their operations.

At MTN Uganda, we are aware of the environmental impact associated with our energy use, which is our primary source of Green House Gas (GHG) emissions, particularly the carbon emissions generated from both direct fuel consumption and electricity usage. To address these challenges, we are committed to reducing our carbon footprint by improving energy efficiency across our operations and integrating more renewable energy sources (solar) into our power supply.

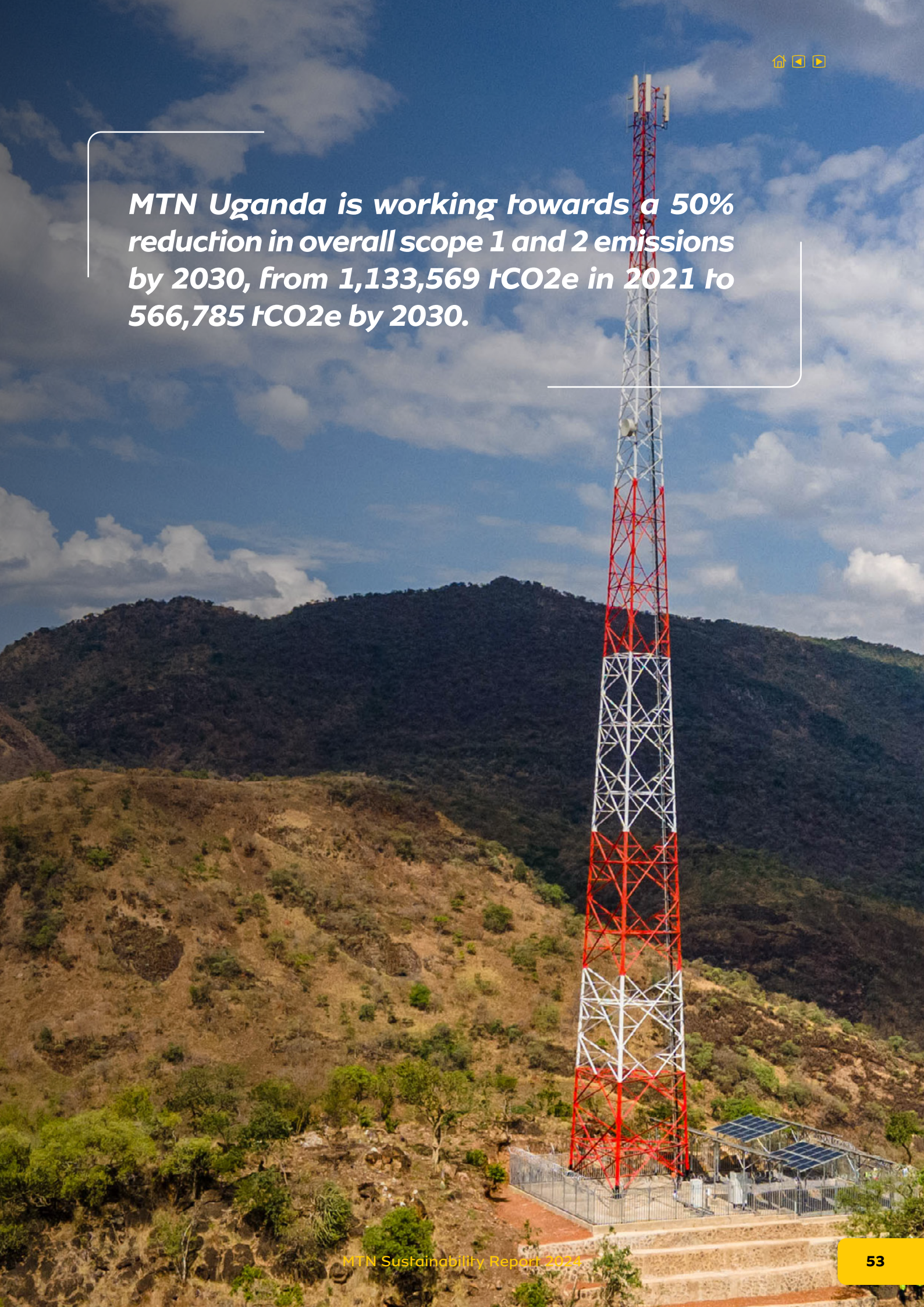
Our Emissions Profile

As MTN Uganda, we adopted the Scope 1 and 2 emissions targets set by the MTN Group and achieved a result of 58.4% by the year 2024. This enabled us to identify areas where we could do more to achieve these targets. Consequently, MTN Uganda established new baselines and developed internal targets, as well as new initiatives, aimed at reducing emissions. Throughout the years, we have implemented carbon and energy reduction initiatives, contributing to the reductions in Scope 1 and 2 emissions.

We have also conducted materiality assessments at MTN Uganda to gain a better understanding of emissions across our value chain. These assessments revealed that we have achieved an aggregate 8.5% reduction in Scope 1 and Scope 2 emissions, respectively.



MTN Uganda is working towards a 50% reduction in overall scope 1 and 2 emissions by 2030, from 1,133,569 tCO2e in 2021 to 566,785 tCO2e by 2030.



Measuring our GHG emissions

The MTN Group collects energy consumption data through financial invoices and monthly smart meter readings from each of the Opcos to calculate Scope 1 and 2 emissions.

Scope 1 Emissions

Emissions include all stationary, mobile, and fugitive emissions for each Opco.

Scope 2 Emissions

Are calculated based on grid and Independent Power Production (IPP) metered electric supply.

Scope 3 Emissions

Account for 74% of MTN's total GHG emissions and are the most challenging to compile.

Data Enhancement for Scope 3

For more comprehensive and strategically insightful data, MTN has implemented a granular, bottom-up data collection approach.



To ensure a more comprehensive and strategically insightful understanding of our Scope 3 emissions, MTN has implemented a data enhancement initiative. This involves a granular, bottom-up data collection approach from select Opcos and the integration of newly available data from key MTN entities, including Ayoba, Digital, and Bayobab. This enhanced data provides a more transparent and more robust foundation for our sustainability efforts.

Emissions data is reflected on a PowerBi Dashboard for MTN's Project Zero tracking. This empowers Opcos to view how they are performing against Net Zero targets for the current year and how they are tracking in comparison to their historical consumption and emissions. Proactively driving our carbon reduction journey forward, we are enhancing our capabilities through the deployment of a new automated emissions tool and the addition of new specialised carbon expertise. These developments will ensure we maintain momentum in continuously improving our sustainability performance.

The IFRS S2 reporting standards require additional metrics, including:

- ▶ The amount and percentage of assets or business activities vulnerable to climate-related transition risks.
 - ▶ The amount and percentage of assets or business activities vulnerable to climate-related physical risks.
 - ▶ The amount and percentage of assets or business activities aligned with climate-related opportunities
 - ▶ The amount of capital deployed towards climate-related risks and opportunities.
 - ▶ Internal carbon prices.
- MTN is continually evaluating these additional metrics to determine if we can provide reliable reporting and disclosure, as well as adapt these standards to our GHG emissions data capture.

Emissions data is reflected on a PowerBi Dashboard for MTN's Project Zero tracking which empowers Opcos to view how they are performing against Net Zero targets.

MTN Uganda's Scope 3 Emissions.

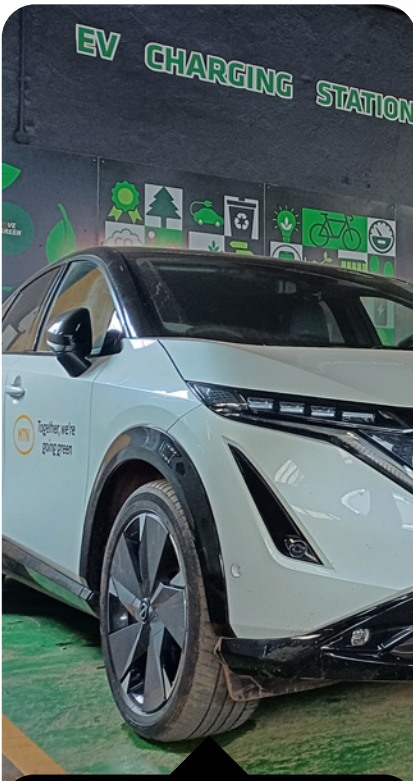
In 2021, ERM conducted a Scope 3 materiality screening to better understand MTN's emissions across its value chain, in line with the GHG Protocol Corporate Value Chain Standard. The relevant material categories were identified from this process. The material categories to be assessed during the identification of Scope 3 emissions are purchased goods and services, capital goods, fuel, and energy-related activities, as well as the use of sold products.

We rely on a local and global supply chain to provide our customers with affordable and reliable products and services. We manage our local purchasing and supply chains by enhancing local content and supplier partnerships. To ensure continuity of supply, we proactively manage different ethical and environmental risks.



**Scope 1
Direct**

Emissions from sources (on site)



**Scope 2
Indirect**

Emissions from energy/utilities.



**Scope 3
Indirect**

Emissions from the chain supply or service

We have a responsibility to ensure our procurement practices:

- ▶ Are conducted in accordance with local and international laws and standards.
- ▶ Benefit the local economy.
- ▶ Support Net Zero initiatives to reduce emissions.

Our Strategy around Scope 3 emissions recommends increased supplier engagement. The other targets will require MTN to obtain supplier-specific emission factors. Achieving supplier-specific emission factors in the near term may not be possible, as many companies are still in the process of setting their targets. However, MTN partners, such as ATC (American Tower Corporation) and Toweco, are greening their project sites and reporting to MTN as part of the Scope 3 reduction arrangements.

Recognising the challenges with other suppliers, MTN has agreed that from now on, we will convene supplier forums to train and award ESG best practices and embed sustainability requirements in RFPs and contracting. These shall include ESG considerations when procuring items (such as opting for paper cups over plastic disposal cups or when procuring MiFi devices from a supplier) and third-party audits or verification to ensure supplier alignment with our Scope 3 emissions targets.

Our strategy around Scope 3 emissions is increased supplier engagement to obtain supplier-specific emission factors.

Progress Towards Net Zero

MTN Uganda adopted the Science-based Targets Initiative (SBTi) as part of Project Zero in 2022.

Completed Initiatives 2023:

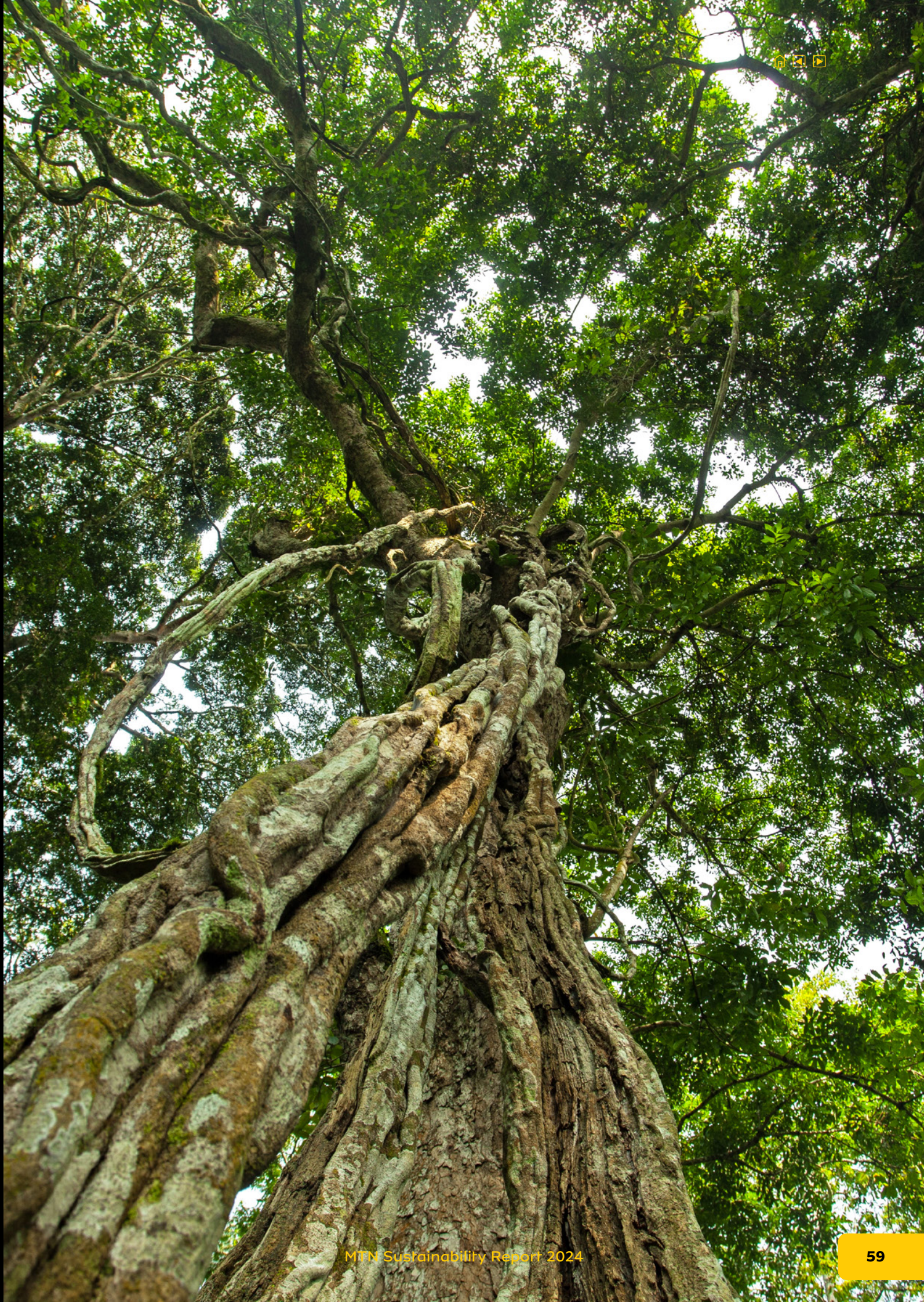
- 1. Grid Connection at BTS Sites: 197 sites
- 2. Solar Installations: 152
- 3. Purchased MTN Hybrid Cars

Completed Initiatives 2024:

- 1. Grid Connection at BTS Sites: 140
- 2. Solar Installation at BTS Sites: 103

Ongoing Initiatives 2025:

- 1. Grid Connection at BTS Sites: 171
- 2. Solar Connection at BTS Sites: 5 SITES
- 3. Solar Installation at MTN Uganda Head Office
- 4. Solar Installation at Data Centre
- 5. Solar Installation at MTN Residences



Case Study

Advancing Energy Efficiency and Emissions Reduction

Since the inception of Project Zero, we have reduced our emissions, culminating in a 59% decrease by 2024.

Thomas Molepa

Chief Technology and Information Officer

MTN Uganda has made significant progress in reducing its carbon footprint and operational costs through targeted energy efficiency initiatives. With the national grid now largely renewable, more of our sites have been connected to grid power, significantly cutting down generator run hours. We have also introduced solar power at select MTN-owned and managed BTS sites to reduce generator reliance and emissions further. Additionally, the replacement of aging generators with more efficient models, the installation of rectifiers across multiple sites, and the onboarding of high-efficiency precision cooling units at data centers have all contributed to both emissions reduction and lower energy-related OPEX. These combined efforts continue to drive a year-on-year decrease in our carbon footprint and operating costs. Our carbon emissions in 2021 were 11,881, and we have

achieved success in year-on-year reduction of the emissions. We emitted 4,804.71tco2e in 2024. This demonstrates MTN Uganda's commitment to reducing carbon emissions.

As network demand escalates, MTN remains committed to meeting its energy needs through sustainable and cleaner sources. By leveraging advanced technologies and strategic partnerships, we are cultivating more resilient, cost-effective, and environmentally responsible operations. Through the implementation of energy-efficient and environmentally friendly initiatives, MTN Uganda is achieving significant reductions in both carbon emissions and operational costs. As part of our ongoing journey toward net zero, we continue to expand the rollout of solar solutions across our data centers, head office, and service centers.

Results.



Enhanced Governance

We have achieved a 59% reduction in tCo2 from 2021 to 2024.



Energy Saving

Replacement of ageing generators with more efficient models and reduction in generator run hours.



Lower Power Usage

Installation of high- efficiency precision cooling units at data centres and solar at BTS sites



Cost Saving

We have saved approximately USD 462,690 through successful energy projects



Demonstrated Commitment

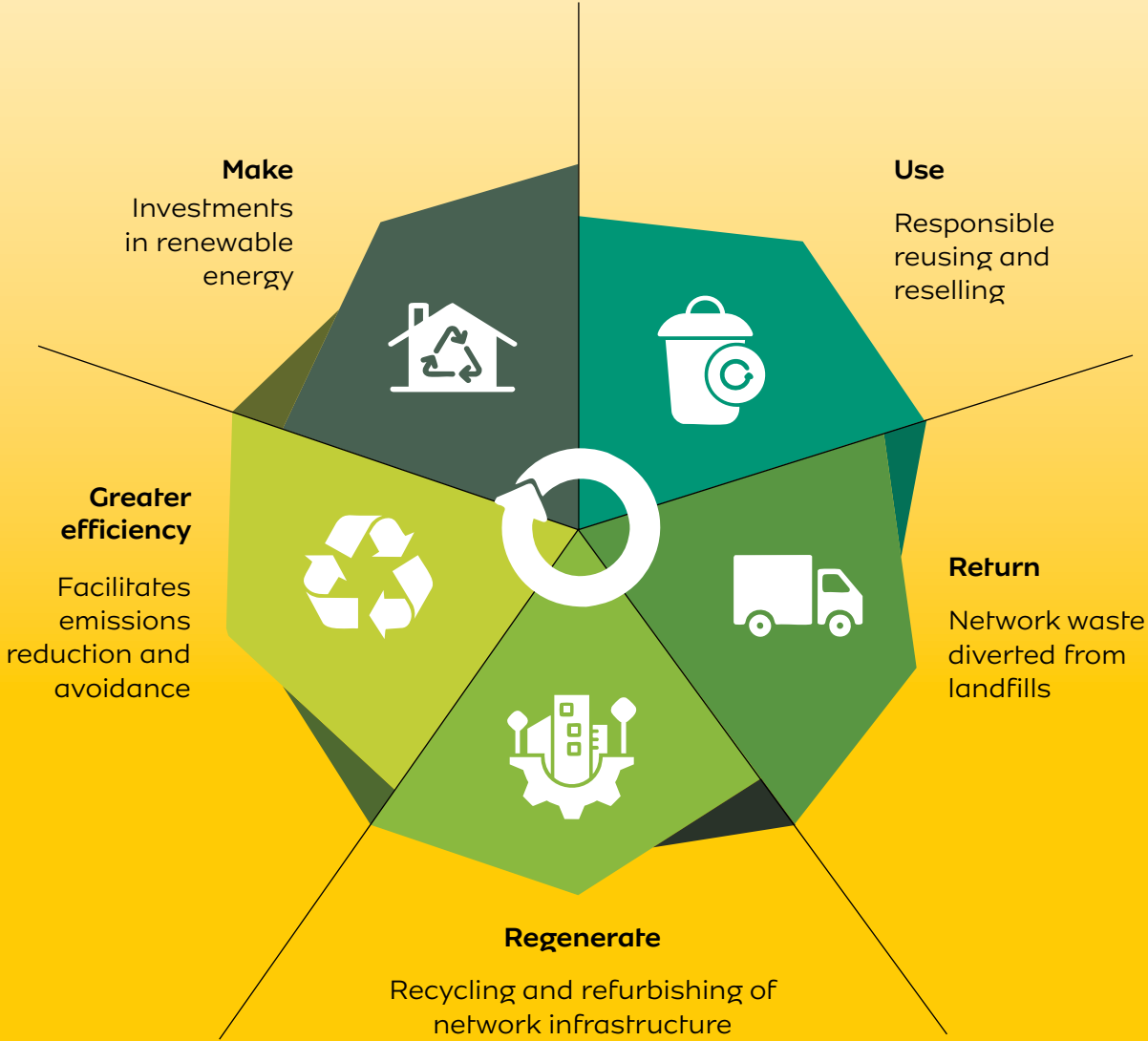
Our carbon emissions in 2021 were 11,881 tco2e but by 2024, we emitted 4,804.71 tco2e.

Project Infinity - Circular Economy

In a world where protecting the environment is paramount, MTN is charting a course toward a circular economy, focusing on managing resource consumption, extending product lifecycles, and minimising waste. Our approach seeks to extend the life of materials, products, and services while minimising waste.

While MTN’s Project Zero focuses on reducing its emissions, “Project Infinity” complements this effort by applying circularity. This means extending the lifecycles of equipment through refurbishment and effectively transitioning from a linear economy to a circular economy.

Our Commitment is to ensure responsible waste management. We achieve this by transitioning from the linear ‘take, make, dispose’ model into a ‘make, use, return’ paradigm.



We have implemented strategies to extract greater efficiencies from our infrastructure and facilities, replacing outdated and inefficient products with more efficient solutions. We implement a circular economy program to keep resources in use for as long as possible, extracting the maximum value from them while they are in use. For this Hard disks are removed before donations are handed over. At the end of each service life, we recover and regenerate products and materials. We continue to focus on ensuring our base station

and data centre sites are as efficient as possible and, where possible, powered by renewable energy sources.

Through this initiative, MTN Uganda has donated e-waste worth UGX 20 million to Makerere University College of Engineering, Design, Art and Technology for responsible recycling, reuse, and disposal. The donation includes 66 monitors, 134 desktops, and 90 laptops, which will be revamped and given to rural secondary schools to enhance ICT access and literacy.



Case Study

MTN's Donation to Fundi Bots

At MTN Uganda, we believe in more than just connecting people; we believe in connecting futures. A core challenge for us, like any large tech company, was how to responsibly manage our used electronic equipment, from smartphones and data devices to vital server infrastructure. Traditional disposal methods overlooked a crucial opportunity to give these valuable assets a new life.

This challenge sparked an idea deeply rooted in our Project Infinity initiative. What if our used tech could power innovation in the community? Instead of merely selling the items, we saw an opportunity to amplify our impact. Fundi Bots, a remarkable non-profit dedicated to nurturing Uganda's next generation of STEM professionals, was a perfect partner for this purpose. Fundi Bots champions practical science, robotics, and coding, **reaching over 284 schools and empowering more than 1,000 teachers across Uganda**, particularly in underprivileged and rural areas. Their mission perfectly aligned with our vision for social impact.

In April 2024, we nurtured this vital partnership. Through the MTN Foundation, we proudly donated 379 electronic items, valued at UGX 65 million, to Fundi Bots. This was not just old equipment; it was the raw

material for learning: **258 smartphones, 39 ZTE data devices, 41 KAIOS mobile phones**, and essential server equipment like KVM machines, server racks, servers, access points, and transmission cabinets. The donation directly fuelled Fundi Bots' robotics training, putting vital tools directly into the hands of eager young minds.

This collaboration is a powerful testament to our commitment to Environmental, Social, and Governance (ESG) principles. By diverting this valuable equipment from landfills, we not only bolster environmental sustainability but also actively empower the next generation with essential STEM skills. It is a tangible example of how embracing a circular economy can create a ripple effect, fostering both ecological responsibility and social change within our communities.

258 Smartphones
39 ZTE data devices
41 KAIOS mobile phones

284 Schools
1,197 Teachers trained



Recycling Billboards to New Homes for Refugees

Case Study

At MTN Uganda, our commitment to sustainability goes beyond our network; it reaches into the heart of communities and the environment. We faced a familiar challenge: what to do with our large volumes of billboard skins once their advertising life was over. Traditional disposal methods often involved landfill waste, despite the durable material. Yet, just a few hundred miles away, thousands of refugees in Uganda face a pressing problem: the desperate need for resilient, long-lasting shelter.

The idea for "Bashe Bora" (meaning "better tarpaulin" in Kiswahili) was born. In an innovative partnership with Every Shelter, a non-profit dedicated to dignified refugee housing, we launched a groundbreaking circular economy initiative. The idea was simple yet powerful: to transform our obsolete billboard skins into sustainable refugee shelters, designed to last 7-8 years.

The recycling is a powerful process of rebirth. Our used billboard skins are carefully collected, cleaned, and prepared for reuse. They are then combined with flexis to create a durable, weather-resistant material that offers both heat reflection and privacy, with the original advertisements cleverly distorted. The resulting "Bashe Bora" is far stronger than ordinary tarpaulins. Even the off-cuts find new life, repurposed into eco-friendly shopping bags, ensuring minimal waste.

The impact has been profound. So far, approximately 1,456 square meters of billboard waste have been diverted from

landfills, offsetting around 780 kg of CO2 equivalent.

Beyond the environmental wins, this partnership is building hope. As part of a pilot, **22 households** in Nakivale refugee camp received skylights, brightening their homes. **This initiative also created opportunities, providing 400 work hours to 8 urban refugees and training 25 refugees in Nakivale in skylight production.** With plans underway to scale up, around **26 households** (approximately **130 people**) are set to gain access to a far more durable roofing solution, transforming waste into dignity and stability.

Approximately 1456 square meters of billboard waste have been diverted from landfills, and around 780 kg of CO2 has been offset.

Workhours 400
Households 22
Urban refugees 8

Managing Our Environmental Impact

As part of our business operations, we generate considerable amounts of both organic and non-organic waste across our offices and data centers. We acknowledge the need to manage our environmental footprint more effectively to mitigate its impact on the environment and biodiversity. Therefore, our sustainability strategy is at the heart of how we utilise natural resources and minimise environmental impact in our business operation

Our commitment	We will achieve this by:
Water resource protection	As part of a water conservation initiative, we utilise water from a natural spring that is stored in an underground tank and pumped for use within our sanitary facilities and other areas.
Biodiversity impact management	To monitor and manage our biodiversity impact, we conduct environmental assessments and monitoring audits before new activities and work with site roll-out partners, tower providers and base transmission station operating partners to maintain environmentally friendly ecosystems.
Green office programme	The green office programme helps our operations and office environments to identify how to conserve resources, reduce consumption, and ensure responsible waste, recycling, and upcycling management practices. At the MTN office premises, compact fluorescent lamp bulbs have been replaced with light-emitting diodes to minimise power consumption and carbon dioxide emission into the atmosphere.

MTN Uganda's compliance with the National Environment Act

 Environmental Impact Assessments (EIAs):	As part of our operations, MTN Uganda is undertaking projects with potential environmental impacts. We are required to conduct EIAs to identify, assess, and mitigate possible adverse effects. We are compliant as we understand the impact of our business operations. Additionally, MTN Uganda continues to engage with NEMA on environmental matters, seeking guidance and ensuring compliance with regulations.
 Pollution Control:	The National Environment Act Cap 181 and related regulations address pollution from various sources, including air and water pollution. MTN Uganda ensures that its operations do not cause unacceptable levels of pollution within the environment.
 Waste Management:	Proper management of waste generated by MTN Uganda's operations is crucial. This includes safe disposal of electronic waste, packaging materials, and other waste streams. This is evident in our operations strategies and targets through Project Infinity.
 Energy Efficiency and Renewable Energy	As part of its commitment to sustainable development, MTN Uganda is encouraged to adopt energy-efficient technologies and explore the use of renewable energy sources. MTN Uganda has publicly committed to achieving net-zero emissions, demonstrating its dedication to addressing climate change by integrating renewable energy into all its business operations and sites.
 Reporting and Monitoring	MTN Uganda is required to report on its environmental performance to NEMA and other relevant authorities. Regular monitoring of environmental parameters is also necessary in helping us refine our business operations and develop goals toward building a better world for our operations and consumers.

Case Study

Beyond the Tap: MTN's Water Conservation Initiative

At MTN Uganda's Headquarters in Kampala, we launched a water preservation challenge in 2024. For many years, we relied solely on the public water infrastructure, drawing from a system already strained. But beneath our headquarters, lay a hidden natural spring.

During our facility expansion, we identified an existing natural spring. This spring, a potential water management issue, became an environmental opportunity. We saw past the mere convenience of public water supply, contribute directly to the preservation of Uganda's precious freshwater reserves. This was about honouring our broader eco-responsibility and sustainability goals.

Our solution was simple, but impactful. We embarked on a project to redirect the spring's pure flow into a 1,500-litre underground tank, creating a self-sustaining water cycle right on our premises. The underground tank now serves our sanitary facilities and waters

our gardens, reducing the burden on vital public infrastructure. Beyond this action, we meticulously monitor water consumption across all our buildings, data centers, and stores.

The impact of this initiative is tangible. We have significantly reduced our environmental footprint and achieved approximately 35% in water cost savings. Our consumption figures tell a story of evolving efficiency, with 54,043 m³ in 2022 and a decrease to 49,909 m³ in 2023. While 2024 saw an increase to 64,363 m³ attributed to the office refurbishment works that have been on-going, reflecting growth and new operational demands. This living spring system remains at the heart of our unwavering environmental responsibility. It reinforces our firm belief that connecting with nature compels us to conserve resources and actively contribute to a healthier environment for all.

This initiative directly reduces our environmental footprint and saves approximately 35% in water costs. Our water consumption figures demonstrate this sustainable management: 54,043 m³ in 2022, 49,909 m³ in 2023, and 64,363 m³ in 2024.

While 2024 saw an increase in our water consumption, our overall strategy reinforces our firm commitment to sustainable water management that benefits the environment.

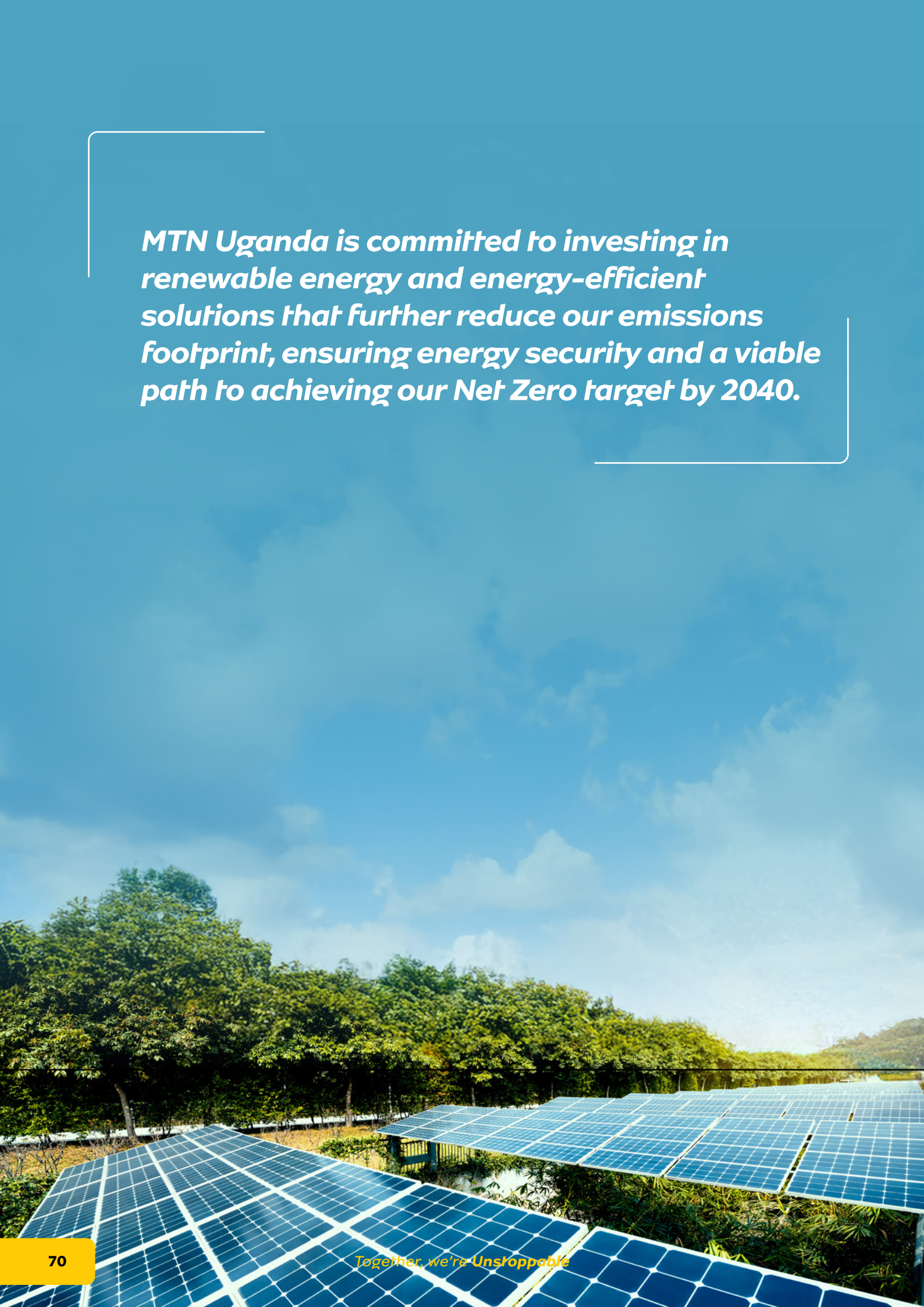


35%

Water Cost Saving

1,500 litres

Underground Water
Storage Capacity



MTN Uganda is committed to investing in renewable energy and energy-efficient solutions that further reduce our emissions footprint, ensuring energy security and a viable path to achieving our Net Zero target by 2040.

Future Outlook

MTN Uganda is committed to investing in renewable energy and energy-efficient solutions that further reduce our emissions footprint, ensuring energy security and a viable path to achieving our Net Zero target by 2040. We are aggressively documenting the sources of carbon emissions associated with our business operations and responding to these challenges.

We aim to drive practical change to safeguard the planet by:

Developing a Renewable Energy Plan that will streamline our operations and the development of solar energy generation at our data centres and mobile BTS sites. This also includes plans to deploy solar technology at the Head Office to improve our energy efficiency in line with upcoming energy efficiency legislation in Uganda.

We are also looking to deploy mobile solar capabilities wherever possible.

Improving our data capture and reporting monthly to enable us to track our progress across all our energy initiatives.

We are working to review all aspects of our “doing for the planet” initiatives alongside contributing towards legislation and policy frameworks in the areas of climate and energy efficiency in Uganda, drawing lessons from our business to ensure that we continue to comply and add value within our operations.

We will explore how our community-based initiatives and outreach can be repurposed to expand climate-based education and enhance the capacity of our stakeholders, fostering a common, measurable commitment to reducing our carbon footprint and environmental impact, thereby ensuring a healthy environment for all of Uganda, especially future generations.

Doing for people

MTN Uganda is committed to empowering people by expanding digital access, promoting financial inclusion, and supporting digital literacy. Through our services, social investments, and inclusive practices, we aim to uplift communities and drive equitable development across Uganda.



Doing for people

At MTN Uganda, our business goes beyond just connecting people; we aim to empower every Ugandan to enjoy the benefits of a modern connected life. As a telecommunications provider, we acknowledge our significant responsibility to lead efforts that create opportunities and provide access for everyone, no matter their background or location. We strive to build sustainable communities through our products and expand our network coverage, helping people to thrive.

In the rapidly changing digital world, dependable connectivity is a social and economic driver that helps reduce inequalities in access to and use of technology and its benefits. We are dedicated to closing this digital gap, making sure that a modern, connected life is accessible everywhere in the country. Our strategy is guided by initiatives such as financial inclusion, digital access, and digital literacy within our communities. By empowering individuals with digital tools and knowledge, we increase participation in and growth of the digital economy, promote an inclusive work environment, and contribute to building an equitable and prosperous Uganda.

Our commitment to social impact is reflected in our operations and amplified through the work of the MTN Foundation. Through targeted Corporate Social Investment initiatives, we uplift underserved communities and contribute to sustainable development, ensuring that our commercial success has a defined and demonstrable link to the well-being of the communities we serve. The welfare of our dedicated staff brings this commitment to life.



Empowering Every Ugandan Towards A Modern Connected Life

Our Approach

At the core of MTN Uganda's vision is the belief that everyone deserves the benefits of a modern, connected life. Our dedication to building more sustainable societies comes from the understanding that everyone, regardless of background or location, should have access to the opportunities that digital connectivity provides.

By promoting digital and financial inclusion, upskilling our workforce with future-ready skills, fostering diversity and inclusion, and uplifting communities through CSI Initiatives, MTN actively promotes positive social change in Uganda.

MTN actively promotes positive social change in Uganda. We are dedicated to aligning our goals and methods with the UN SDGs and national laws. This highlights our ability to create lasting value for our customers and stakeholders.

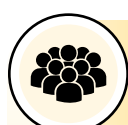
Together, we are creating value for a brighter and inclusive future.

Our Commitment to People



Accelerating digital inclusion

- Rural connectivity
- Affordable data and handsets
- Digital adoption



Fostering a skilled, diverse, and inclusive society

- In our workplace
- In our communities
- In our retail outlets



Driving financial inclusion

- Convenient, low-cost transacting
- Saving
- Micro-lending
- Insurance remittances



Uplifting our communities

- Education through digital literacy
- Women and youth empowerment
- ealth by enabling access to health
- Yello Hope (Investing in National Priority Areas)
- Y'ello Care

Our Impact: Creating Sustainable Societies

Our commitment to Doing for People is reflected in a growing and diverse range of programs. These programs are specifically designed to create sustainable change across various parts of Ugandan society, particularly among the most underserved, while also building a profitable business.

Beyond expanding connectivity and digital inclusion, our initiatives address economic empowerment, health, and education, aligning the Sustainable Development Goals and contributing solutions to pressing social problems. In turn, a healthy economy and society drive our capacity to do more meaningfully and deliberately.

Metric	2024 Achievement	2023 Baseline
Data subscribers	10.1 million	8.2 million
Fibre-home connections	10,500	8,300
Fibre coverage	17,774 kilometres	12,072 kilometres
Smartphone penetration	44.9%	39.1%
MTN MoMo subscribers	13.8 million	12.1 million
MTN MoMo transaction value	UGX 158.6 billion	UGX 133.2 billion
MTN MoMo transactions	4.3 billion	3.4 billion
MTN MoMo agents	212,500	155,000
Number of employees	1,323	1,349
Women in workforce	48.4%	51.0%
Women in senior management	38.0%	38.9%
Broadband coverage — 5G	15.3%	0.3%
Broadband coverage — 4G	87.9%	85.1%
Broadband coverage — 3G	94.6%	92.6%
Broadband coverage — 2G	98.9%	98.6%
Rural broadband coverage — 3G	94.6%	92.60%



Our CHASE Framework: Driving Digital Inclusion

As an industry leader, MTN Uganda bears the responsibility to support digital inclusion by ensuring that all consumers in our country of operation have access to the internet, affordable communication tools, and services.

Our CHASE framework, introduced in 2018, guides us in overcoming the five key barriers to mobile internet adoption: coverage, handsets, affordability, service bundling, education, and ease of access.

According to the 2024 National Population and Housing Census, only four in every ten persons (43.3%) aged 10 and above in Uganda own a mobile phone, while only 8.9% use the internet. Moreover, significant disparities persist in mobile phone ownership and internet use across different sub-regions, with some areas still reporting internet use rates as low as 3.2%.

Uganda is actively working towards achieving digital inclusion, with initiatives focused on expanding access to technology, enhancing digital literacy, and promoting an inclusive digital economy. These efforts aim to bridge the digital divide and ensure that all citizens, particularly marginalized groups, can benefit from the opportunities presented by the digital revolution.

The Government of Uganda, in its Vision 2024, underscores the importance of digital services and communications in enabling the country to achieve its set goals. The Ministry of ICT and National Guidance, along with other agencies, is involved in promoting digital transformation and inclusion. Private Sector Involvement has been listed as a key to unlocking this goal.

The CHASE framework goals enable MTN Uganda to make a significant impact in supporting the attainment of these national goals.

Our goal is to ensure that we leave no one behind. MTN Uganda has invested heavily in network expansion activities and initiatives geared towards bridging the digital divide and reducing the costs associated with accessing digital services for its subscribers.



CHASE Framework Achievements by 2024:

In 2024, we recorded the following achievements:

► Data access and cost interventions

More than an affordable handset is needed to connect to the digital world; one must also have affordable data. Therefore, we actively monitor our pricing, focusing on both voice and data and tailor programs to ensure affordability for the bottom 50% of our user base in terms of income.

The United Nations Broadband Commission's target for affordable internet is that an entry-level broadband subscription should cost less than 2% of a person's monthly gross national income per capita. This target is intended to be achieved by 2030. For this purpose, we have developed a score based on price, income, and elasticity to determine if data pricing across our operation meets affordability requirements.

We continue to implement the MTN Group-wide data pricing governance framework, which provides formal guidance on affordability.

► Increased fibre coverage and accelerated rural connectivity

With a considerable portion of Uganda's population residing in rural areas, we are committed to expanding our network to underserved communities. We extended fibre coverage from 12,072 kilometers to 17,774 kilometers. We also increased 4G coverage from 85.1% to 87.9%, 3G coverage from 92.6% to 94.6%, and 2G coverage from 98.6% to 98.9%. We grew our 5G sites to 538 from 37 in 2023, increasing our 5G coverage from 0.3% to 15.3%.

► Supported device financing to reduce the usage gap

Owning a mobile phone improves life, providing access to information, financial services, connectivity, economic opportunities, and emergency response. In collaboration with our device financing partners, 463,493 smartphones were sold in 2024.

► Championing digital literacy

In 2024, we witnessed 253 young individuals graduate from our digital literacy program in Eastern Uganda, 571 in Western Uganda, and over 100 in Northern Uganda. Since its inception in 2022, our digital literacy program has reached out to 4,795 youths in Uganda, equipping them with foundational ICT skills.

The MTN ICT Expo 2024



As the pioneer of technology solutions in Uganda, we successfully hosted the inaugural MTN ICT Expo 2024, a landmark event that brought together industry leaders, innovators, and key stakeholders to explore the transformative power of digital technology. Building on the resounding success of the inaugural MTN ICT Solutions Conference in 2023, the 2024 Expo, endorsed by the Ministry of ICT, focused on four service areas:

As a pioneer in Uganda's tech landscape, MTN is shaping the digital future. Our ICT Expo 2024 united innovators to explore transformative tech solutions.

We showcased advances in Cloud, IoT, Digital Services, and Unified Communications. These platforms are driving smarter, scalable, and connected operations.

Together, we're enabling Uganda's digital and economic evolution.

Service Area Description

Cloud Solutions



Enabling businesses to store, manage, and process data through cloud-based platforms, enhancing scalability and reducing IT costs. Examples include MTN's cloud storage services and data backup solutions.

Unified Communications



Integrating various communication tools, such as voice, video, messaging, and conferencing, into a single cohesive system improves collaboration and productivity. MTN's solutions include VoIP services and virtual meeting platforms.

Internet of Things (IoT)



Connecting devices and systems to the internet to collect and exchange data, enabling smarter operations and automation. Examples include MTN's smart agriculture solutions and connected home devices.

Digital Services



Offering a range of digital tools and platforms that enhance business operations and customer experiences. These include MTN's mobile money services, e-commerce platforms, and digital marketing solutions.

Financial Inclusion through MTN MoMo

MoMo Managing Director's Statement



MTN Uganda is driving financial inclusion and socio-economic growth of Uganda by expanding access to secure, affordable financial services. In alignment with the National Financial Inclusion Strategy (2023–2028), our MoMo platform connects millions to the formal financial services, enabling everyday transactions and offering scalable products like money transfers, payments, microloans and remittances.

These innovations position MTN as a key enabler of inclusive economic participation, supporting national development goals while unlocking long-term value for stakeholders.

Access to robust financial services delivered through our innovative channels serves as a driver of socio-economic development across Uganda. As highlighted in the second National Financial Inclusion Strategy (2023–2028), millions of Ugandans lack access to secure and affordable financial services. MTN products and innovations are broadening and democratising access to quality financial products, thereby reducing barriers to opportunities for all citizens, regardless of their background or education. Our financial inclusion approaches are aligned with national objectives and policies on poverty reduction, tracking performance across the country, and reporting progress.

Richard Yego
Managing Director, MoMo

MTN Uganda has played a pivotal role in transforming Uganda's economic landscape. Our financial products have transformed the use of mobile financial services into critical aspects of the economy as well as everyday business and personal financial transactions. By connecting millions of people to a formal financial system through our MTN MoMo platform, we are expanding access to quality financial products, thereby reducing barriers to opportunities for all.

Through Momo, we offer a wide range of services to meet various needs, including secure **mobile wallets, accessible microloans, and micro-insurance solutions**, among others. Acknowledging the vital role of small and medium enterprises in Uganda's economy, we have specifically tailored several of our services to meet their unique needs through MTN Momo Business, empowering economic drivers with the tools they need to thrive.

Our Financial Inclusion Impact

Metric	2022	2023	2024
Active Fintech subscribers	10.9MN	12.1MN	13.8MN
Active MTN MoMo Agent	166,229	166,232	212,500
Volume of MoMo transactions	2.7BN	3.4BN	4.3BN
Value of MoMo transaction	92.3TN	133.2TN	158.6TN
Value of loans Disbursed	403BN	569BN	1.5TN
MoMo Interest Paid to Customers	20.5BN	44.2BN	43.4BN

Our objective is to be Uganda's leading digital platform, unlocking economic growth through financial and digital solutions for consumers and businesses of all sizes. Our MTN MoMo platform is designed to enable consumers and businesses to access a comprehensive range of financial services, serving as a gateway for thousands of innovative businesses to transact with millions of customers nationwide.

This enables us to fulfil our **Ambition 2025** strategy of creating a digital marketplace that supports digital economies through affordable, inclusive, and comprehensive financial services. Our understanding of the local financial landscape has enabled us to identify elements of our consumers' lives that are essential for their growth.

As a result, in addition to offering digital financial services through MoMo, we have explored additional services that include the following:

Additional MoMo Services Innovation

Service	Description
Market by MoMo	In November 2024, we launched Market by MoMo, a cutting-edge digital commerce platform aimed at connecting local merchants with buyers both within Uganda and across the globe.
MTN MoMo API	Our MoMo API platform allows partners and vendors to seamlessly integrate MTN MoMo into their applications, and our 'API as a Service' solution provides third parties with access to our proprietary software platform.
Supporting SMEs	Through MoMoPay, we offer businesses a secure, convenient and efficient payment method that can be tailored to meet their unique needs.
Loans and Savings	Our saving and lending facilities continue to support our customers in meeting their financial needs. In 2024, we disbursed UGX 1.5 trillion in loans, increasing from UGX 569 billion in 2023.
Remittances	Registered MTN MoMo customers are able to send and receive funds globally through MTN MoMo remittance, recognizing the transformative impact that remittances have on poverty reduction across Uganda.



Human Capital Excellence - Our People



Micheal Ssekade
General Manager, HR

Our employees are the cornerstone of our success. We believe in ‘Mission First, People Always,’ as reflected in our Employee Value Promise, ‘Live Inspired,’ and our strategy, Ambition 2025. Our human capital strategy prioritises the entire employee journey, from attracting top talent to fostering engagement and providing comprehensive support through our total rewards programme.

We are dedicated to creating a workplace where staff feel valued, supported, and empowered to make meaningful contributions. **Our commitment to openness and inclusivity ensures that diverse stakeholder perspectives are integrated into our operations, enabling us to deliver exceptional services and maintain long-term resilience.** Continuous engagement allows us to understand and meet stakeholder needs, thereby enhancing the quality of life in the private sector and strengthening the social security safety net. By prioritising ESG principles, we create sustainable value and ensure transparency and accountability in all our interactions.

Occupational Health and Safety:

- 1. Occupational safety and health: Emphasis on the safety and health of employees
- 2. Employee well-being: Target 95% staff satisfaction rate

Our Highlights:

Metric	Achievement
Total Workforce	1,323
Women in our workforce	48.4%
Women in executive management team	38%
Employee sustainable engagement index	93%
e-NPS index	83%

2024 Happy People Survey Sentiments

Metric	Score
Sustainable engagement	91%
Human resource service experience	83%
Inspiring leadership experience	87%
Inclusive culture experience	92%

Promotion of Employee Well-Being

- We have invested in well-being facilities at the workplace, which include a wellness center to enable employees to relax and exercise to enhance their physical and mental fitness.
- The ‘anywhere, anytime work’ flexibility policy supports our employees’ work and life priorities. This policy is designed to empower staff to manage their job effectively.
- We have incorporated a Creche program within our framework that enables mothers to integrate back into the workplace from maternity leave. This provides them with an opportunity to balance their responsibilities and nurture their little ones alongside delivering on their assignments within the workplace.
- We continued with our **Women@Work initiatives**, which included financial resilience and planning training, mentorship sessions, and female entrepreneurship programs for local female suppliers. We have piloted a women's leadership program called Women EXCO, where we are developing upcoming future female leaders at the managerial level to expose them to practical leadership development and the day-to-day life of a senior management executive.
- **The MTN-212-Men** community is a platform aimed at empowering, grooming, preparing, and enabling male employees to live a healthy, purposeful, and impactful life.
- We developed a disability programme that aims to empower and support people with different abilities. We are committed to giving equal employment opportunities to persons who are differently abled because we believe in providing equal employment opportunities to all individuals, including those who are differently abled. We currently have 8 differently abled people as part of our workforce. This has a positive impact on the inclusion index, and we hope to keep growing.



Women@work



212 Men



CEO Book Club

Culture of Recognition

We recognize and reward our top performers for their contribution to the achievement of the company's results. This is achieved through competitive reward approaches, including annual performance-based salary increases, short-term incentives, quarterly team recognition awards, long-service awards, and notional share options incentives.

Harassment and Discrimination.

We have a zero-tolerance approach to harassment and discrimination. Our 'Speakup' framework fosters a culture of safety, openness, and honesty in our work environment. This framework aims to strengthen our commitment towards an inclusive global organisation, which proactively detects, prevents, and acts upon any form of discrimination and harassment.



MTN HQ crèche established to support mother's returning to work

Our Live Y'ello Values

In line with our Employee Value Promise of **'Live Inspired,'** we believe that if we want the best people to give their best on the job, they must be at their best physically, emotionally, and financially. We believe that if we can achieve this, we can all truly thrive in a positive environment. We ensure that we weave wellbeing into our culture, from the way we provide feedback to the way we support each other in times of stress. We take direct accountability for this as we believe that the onus is on the company to foster an environment of good habits. The healthier our employees are, the healthier the whole of MTN will be, and we endeavour to embed wellbeing into every interaction.

Emphasising **People Always**, we invest heavily in equipping our people with the skills and knowledge they need to stay ahead of the competition, ensuring that both are always future-ready. We believe that a more modern and adaptable approach is more appropriate, and we have refocused our energies on areas that employees define as success for organisations – great employee experience, fair treatment, challenging work, career opportunities, safety, inclusivity, and a culture of recognition.

We believe that there are underlying metrics that can predict the outcomes of what employees are looking for. For this, we need business analysts, data scientists, and modellers in our human resource teams. We aim to leverage these skills and scale these new-age human resource metrics from their pilot phases. Our success will be determined by whether we are a human resource function that meets the needs of MTN as a business.



We are building a human resource function that is service-oriented, experience-driven, analytics-minded and that treats every employee as unique. We refer to this as “hospitality-grade human resource”.

We aim to foster a culture of superior service, dependable experiences, and the ability to use technology to make every “guest” feel unique. In doing so, we have found a way to bring a hospitality-grade experience to our employees.

We are building a human resource function that is service-oriented, experience-driven, analytics-minded and that treats every employee as unique. We refer to this as “hospitality-grade human resource”.



Case Study

Unstoppable Woman Mentorship: Advancing Gender Equity and Inclusive leadership.

Women at Work-Testimonial by Fiona Aguti.

Case Study

At MTN Uganda, sustainability extends beyond environmental responsibility to encompass inclusive economic growth, social equity, and human capital development. Central to this commitment is the Unstoppable Woman Mentorship Program, a flagship initiative designed to advance gender equity and inclusion within the workplace.

Launched as part of our broader Diversity, Equity, and Inclusion (DEI) agenda in 2024, the Unstoppable Woman Mentorship Program supports the professional and personal growth of women employees by creating structured pathways for mentorship, leadership readiness, and peer support. The program plays a critical role in addressing systemic barriers that women often face in corporate environments, such as limited access to networks, underrepresentation in leadership, and implicit bias. By cultivating a supportive ecosystem for women to thrive, MTN Uganda is actively bridging the gender gap in leadership and championing equitable opportunities for all.

Impact

Diversity and Inclusion

We have piloted a women's leadership program called Women EXCO, where we are developing upcoming future female leaders at the managerial level to expose them to practical leadership development and the day-to-day life of a senior management executive.

Key SDG Contributions from our initiatives



SDG 5 GENDER EQUALITY

- Target 5.5: Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making.
- Impact: The program increases female representation in leadership trajectories by equipping women with mentorship, networking opportunities, and professional coaching.



SDG 8 DECENT WORK AND ECONOMIC GROWTH

- Target 8.5: Achieve full and productive employment and decent work for all women and men, including young people.
- Impact: By building internal capacity and fostering inclusive talent development, the program enhances career mobility and economic empowerment for women within the organization.



SDG 10 REDUCED INEQUALITIES

- Target 10.2: Empower and promote the social, economic, and political inclusion of all.
- Impact: The mentorship initiative contributes to a more equitable and inclusive work environment, ensuring no one is left behind. By embedding equity into our talent development framework, MTN Uganda reaffirms its belief that when women rise, businesses thrive, and societies become more just, resilient, and sustainable.

The Women@Work program offered excellent content and assignments grounded in real-life experiences shared by the mentors, which made for a tremendous learning experience for me. The support from my mentor was great, and the themed sessions were well paced, allowing me time to reflect and learn in depth.

I have been made aware of my personality and what I need to do and stop doing, as well as how to build my confidence in any situation. I am glad that I got a chance to network with incredible women in the various divisions in the company during this program and learn from one another.

The mentorship program has enhanced my capacity and equipped me with the knowledge to compete unapologetically for roles in tech alongside my male counterparts. It has emphasized that if I can develop a personal development plan, understand my routines, and overcome my silent fears, then there is no height in my career that I cannot attain. What a man can do, a woman can do better. I know that when opportunity shows up in a male-dominated room, I will show up and pitch my best without fear.

I would like to express my appreciation to our CIC, Sylvia, and the W@W community for this program. Then, a special thank you to Manuela Mulondo for sharing her real-life experiences without holding back. And to my mentor Olivia Newbold, who, amidst her busy schedule, gave me ample time to redefine myself, I am grateful. I cried, I unlearned, and together we prayed, discovering ourselves under her mentorship. Emphatically, as women together, we are Unstoppable.



Fiona Aguti

Team Leader
Contact Center



Doing More Through the MTN Uganda Foundation

Established in July 2007, the MTN Uganda Foundation is a non-profit organization incorporated to implement all of MTN’s corporate social investment initiatives. The primary objective of the MTN Foundation is to enhance the quality of life in communities nationwide by supporting and implementing sustainable development projects.

Our thematic focus areas, namely, Youth Empowerment, Education, Health, and National Priorities, are informed by the MTN Uganda Corporate Investment Policy. The four thematic areas are tailored to address national challenges aligned with the National

Development Plan and the global targets set through the UN Sustainable Development Goals.

The Foundation is funded annually by an endowment of 1% of MTN’s after-tax profit. We partner with credible public and private nonprofit organizations to execute sustainable projects in each of the chosen focus areas. Through the Foundation, MTN is doing more, allocating its spending through the ICT ecosystem, which aligns with Uganda’s digital transformation strategy and our **Ambition 2025**.



Our Corporate Investment Initiatives are in line with our commitments towards building a more prosperous and sustainable future for communities and aligned with UN SDGs:

Our CSI Strategic Framework

Education:

Meet the education needs of Ugandan Communities



Health:

Support access to affordable healthcare services in communities



Y'ello Hope:

Provide micro-level support in disaster/ humanitarian relief and recovery



Youth Empowerment:

Provide access to skills, tools and knowledge



MTN Uganda seeks to create value for the broader community through initiatives that enhance education, health, and economic opportunities. Our Corporate Social Investment (CSI) programs are designed to uplift vulnerable segments of society by investing in community development projects that provide access to clean water, sanitation, and healthcare.

Our impact is rooted in fostering economic empowerment, promoting digital inclusion and digital literacy, and creating a path towards a future where every Ugandan can thrive in the digital world. This is achieved through our targeted initiatives of the MTN Foundation that address critical needs.

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Together, we're Unstoppable

MTN Sustainability Report 2024

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Theme: Education

Through the MTN Foundation, we have significantly expanded access to digital tools and infrastructure, particularly in underserved regions. We strive to provide more than network coverage; we are actively establishing physical points that bring digital resources directly to communities that need them most

Community ICT Resource Centers

In 2022, we established five centers, specifically reaching 406 children with disabilities, providing them with critical access to technology. We continued this work in 2023, expanding our initiative to 5 centers and supporting an additional 381 children with disabilities. Then came a significant leap in 2024. Our initiative grew exponentially to 35 centers, impacting an estimated 16,000 learners through Promoting Equality in African Schools (PEAS) ICT Hubs. This expansion included specialised schools, such as Wakiso School for the Deaf, ensuring digital inclusion for even more students.

Our commitment to education goes beyond just digital tools. We understand that a conducive learning environment is equally important, especially in rural and remote communities. To this end, we continually strive to enhance school infrastructure through the construction and equipping of classroom blocks in both primary and secondary schools across Uganda. This physical investment has directly benefited thousands of learners. In 2022, our contributions to school infrastructure impacted 780 learners across four schools. We continued our support in 2023, with further investment in furnishing two schools, benefiting 104 learners. In 2024, our commitment to improving physical learning spaces directly impacted 120 more learners.

This two-pronged approach, which provides both digital tools and appropriate physical spaces, underscores our holistic strategy for education. We are ensuring that students have everything they need to excel academically, setting them up for success in the digital age.

MTN Skills Academy

MTN Foundation launched the ‘MTN Skills Academy’ to develop young professionals and entrepreneurs as producers, consumers, and innovators of digital technologies.

The academy provides access to digital and financial skills and will be implemented in collaboration with the Ministry of ICT, the National ICT Innovation Hub, ATC Uganda, and Huawei Technologies. The ‘MTN Skills Academy’ focuses on solutions to digital challenges facing the youth in Uganda in the wake of the Fourth Industrial Revolution (4IR). Young people can access career guidance counselling, receive free online training in digital and financial skills, develop work readiness to enhance their employment prospects, and be exposed to job opportunities across the public and private sectors to improve job placement possibilities. We have over 931 beneficiaries of the project.

The MTN Ace programme is complemented by the MTN Skills Academy, which we launched in 2022 in partnership with the Ministry of ICT, the National ICT Innovation Hub, Centenary Technology Services, Refactory, a local technology academy, the Makerere University Business School Entrepreneurship Innovation and Incubation Centre, as well as MTN MoMo.





Theme:
Youth Empowerment

MTN Ace Programme

The MTN Ace programme is complemented by the MTN Skills Academy, which we launched in 2022 in partnership with the Ministry of ICT, the National ICT Innovation Hub, Centenary Technology Services, Refactory, a local technology academy, the Makerere University Business School Entrepreneurship Innovation and Incubation Centre, as well as MTN MoMo.

In 2023, 410 youths were selected to participate in the inaugural cohort of the programme, with 333 graduating. The programme targets Ugandans with innovative ideas to solve real-life problems across all sectors, with a specific focus on Uganda's NDP and Vision 2040 development priorities. Within less than a year of the program's launch, it facilitated the completion of 1,882 courses and 1,994 in 2024, nearly doubling our completion targets for both years, and significantly increasing the acquisition of digital skills for digital jobs.

MTN Girls with Tools: Smart Girls' Foundation Testimony

Case Study

My name is Jamila Mayanja, and I founded Smart Girls Uganda with a powerful vision. I was tired of seeing young women limited to “gender-friendly businesses” like market stalls. I envisioned a future where girls could confidently master male-dominated trades and truly take charge of their future.

Our relationship with MTN Foundation started in 2019, when MTN Uganda’s **Yello** Care initiative discovered us. Then, with just basic structures, I was training around 30 young women in mechanical and electrical engineering. MTN Foundation’s support helped to structure our foundational efforts. They provided us with tools, covered sheds, renovated toilets, and donated computers and free internet. This equipped our aspiring mechanics and electricians with essential digital literacy, setting them apart in the field.

MTN’s belief in our potential validated the program, resulting in an increase in our numbers. From 30, we grew to 120 girls by 2020, attracting wider attention and more partners. Even as the world faced COVID-19 lockdowns, Smart Girls persevered, eventually relocating to new, larger premises. MTN continued its support, helping us establish structures in this new home, including expanded computer access. Recognising the power of digital skills, we began offering free basic computing courses to anyone in the community, reaching far beyond our core vocational students.

In 2023 when the MTN Foundation sponsored our MTN ‘Girls with Tools’ programme, helping us establish a training facility in Kitefika, Gayaza, Wakiso District. This modern hub now trains over 400 young women annually in a diverse range of vocational skills, including mechanics, electrical installation, welding, carpentry, tailoring, house painting, and newer additions such as water engineering, motorcycle repair, and even plumbing.

The impact has been nothing short of transformative. In 2023 and 2024 alone, nearly 1,000 girls were equipped with skills through the ‘Girls with Tools’ and ‘Girls in Tech’ programs, all of which are certified by the Ministry of Education’s Directorate of Industrial Training. MTN’s contributions of laptops and funding enabled us to partner with other community organizations, providing off-site training in regions such as Kayunga, Jinja, and Bombo.

The support does not end with training. After the graduation in 2022, MTN connected our girls with partner companies, such as Motorcare, which directly led to job opportunities for over 200 of our alumni. We also guide our graduates through a Business Innovation Studio, empowering them to start “human-centered businesses” within their new skills. We have tracked over 50 such businesses, often started in teams:

- Two Smart Girls, Shalom and Naira, launched Solar Girls Africa, a company providing solar solutions to disadvantaged communities with flexible payment plans.
- Our innovators in Soroti created an underground water tank indicator, preventing accidents.
- Hadija, a young mother, established a thriving electrical engineering and repair shop in Busia, even hiring recent graduates and inspiring new learners from her community.

Annually, 500-600 young people graduate from our programs. Many go on to establish their own electrical workshops and mechanical garages. Smart Girls Uganda’s growth has been possible through the MTN Foundation’s support.

What I love about MTN Foundation is that they do not just give back, they sit down with you, understand why you’re doing what you’re doing and why they’re giving you what they’re giving you. They help you understand how to make it much better.

Jamila Mayanja
Smart Girls’ Foundation



Sparking Change: The MTN Changemakers Story

In 2024, the MTN Foundation launched the second phase of our MTN Changemakers initiative. MTN Changemakers is our promise to support the incredible individuals and organizations across Uganda who are already making a real difference in their communities. We help those with powerful ideas or those already bringing projects to life, all aimed at improving people's lives.

We embarked on a thorough search, and after a competitive evaluation, the MTN Foundation selected 25 impactful projects. Each of these chosen initiatives received vital technical and financial assistance, aligning perfectly with our core focus areas: economic empowerment, education, and health.

Our selected Changemakers spanned all corners of Uganda, reaching into five diverse subregions:

Northern	Eastern	Greater Central	Central & Western
West Nile, Lango, Acholi, and Karamoja	Busoga, Teso, Bugisu, and Bukedea	Luwero, Mpigi, Masaka, and Mukono	mainly Kampala, Kigezi, Bunyoro, Ankole, and Tooro



Changemaker in Gulu

Each of the deserving projects received funding of up to UGX 20 million, providing crucial support to bring their visions to life. In total, MTN invested UGX 500 million into the MTN Changemakers program in 2024, fueling grassroots innovation and empowering communities from within.



Announcement of Winners



Case Study

30 Days of Y'ello Care: Learn Today, Lead Tomorrow

Every year, from June 1st to June 21st, MTN Uganda hosts **Y'ello Care**, an annual employee volunteerism initiative where our staff dedicate their time and expertise to support communities across Uganda. 2024 marked our 17th edition of 21 Days of **Y'ello Care**. In honour of MTN Group's 30th anniversary, 2024 marked a special edition, extending our flagship 21 Days of **Y'ello Care** to 30 Days of **Y'ello Care**, under the theme "Learn Today, Lead Tomorrow."

Our 2024 **Y'ello Care** journey commenced at Kansanga Seed Secondary School in Kampala. Here, we officially launched the initiative by providing 20 computers with a one-year paid internet connection, designed to enhance the students' learning experience. This immediate support set the tone for our commitment to digital education.

Across Uganda, **Y'ello Care** broadened its impact by collaborating with 35 organizations spanning various sectors. This marked the highest number of collaborations in the program's history, demonstrating our commitment to community upliftment. Through these partnerships, we supported projects in four additional schools, specifically providing digital skills training through our mobile training facility, the MTN Internet Bus.

The 2024 edition of **Y'ello Care** involved digital tooling and the upgrading of school infrastructure in five seed schools across Uganda, representing a total investment of UGX 680 million. Our dedicated staff contributed directly through their labour in the construction and roofing of girls' changing rooms at Ariwa Secondary School in Yumbe district, clearing debris at the construction

site of Ventilated Improved Pit (VIP) latrines at St Joseph Aid Society in Kyankwanzi, and actively building VIP latrines at Ongongoja Secondary School and Bishop Dustan Nsubuga Memorial School.

Beyond these physical improvements, our staff engaged in five core types of volunteer work crucial to providing our digital skills services to youth. These efforts aim to help them develop their inner vision and purpose. The work included Project conceptualization and design informed by the **Y'ello Care** pack from MTN Group, thorough needs assessments and fieldwork, direct skilling and training, and valuable financial donation.

The strategic focus of the 2024 **Y'ello Care** campaign was prioritising education for rural and remote communities. We carefully selected schools based on specific criteria to maximize our impact. These included addressing challenges related to accessing new lower secondary curriculum content, especially given the mandatory and examinable nature of ICT at this level. Our focus was on Universal Secondary Schools and government-aided schools, with all five chosen institutions falling into this category.

We also deliberately selected inclusive schools that cater to children living with disabilities, such as Bishop Dunstan Secondary School and St. Joseph's Aid Society, as well as vital refugee community schools like Ariwa and Kansanga Secondary Schools.

Our **Y'ello Care** approach for 2024 ensured that schools in underserved communities receive the necessary digital equipment and infrastructure, directly addressing critical gaps in access to quality education.



Y'ello Care in Kalangala



Y'ello Care in Yumbe

Theme: Access to Health Care

As part of our goal to ensure a healthy population, through the MTN Foundation, we are meeting the needs of Communities by enabling the Government of Uganda's National Development Plan IV and Vision 20240 by supporting access to healthcare. We support the Government of Uganda in improving maternal and neonatal health in our communities for the benefit of a modern, connected life, beginning with access to quality healthcare.

MTN Foundation donated essential medical equipment worth UGX 58.3 million to Nawansega Health Centre III in Luuka District. The equipment included a CBC 3-part machine, a centrifuge machine, delivery and programming costs, solar lighting, 15 hospital beds and 15 mattresses, a medical refrigerator, and a microscope.

y'ello Hope enables us to participate in disaster relief support for the most vulnerable within our communities. This program allows us to provide micro-level support during disasters and humanitarian recovery efforts within our communities. The MTN Foundation partnered with the Uganda Red Cross Society and the Office of the Prime Minister to provide essential relief kits worth UGX 100 million to 200 families affected by the landslide at the Kiteezi garbage landfill. Fostering resilience and supporting communities in times of crisis is an integral pillar of **Ambition 2025**. Partnering with the government and other implementing partners to provide disaster relief remains a priority for MTN.





Ethical Excellence and Governance Leadership

MTN Uganda is committed to doing business the right way—upholding strong governance, ethics, and accountability. Through effective leadership and transparency, we ensure sustainable value creation and responsible operations that serve both our business and stakeholders.





Ethical Excellence and Governance Leadership

MTN Uganda is committed to the highest standards of governance, business integrity, ethics, and professionalism. We achieve value creation through robust governance, grounded in core elements of accountability, corporate responsibility, a substantial risk and performance management culture, transparency, and effective leadership.

The Board operates under the Company's Articles of Association and Board Charter, meeting regularly to consider matters within its mandate, including the sustainability of the company's operations. We monitor the macro environment, availability of appropriate capital inputs, our impact on these, and stakeholder needs all of which inform our strategy and enable us to maintain operational focus and deliver on targets.

Our governance processes ensure that we remain a sustainable business, creating value for both ourselves and our stakeholders. The Board provides necessary oversight to monitor and enhance performance, underscoring our commitment to transparency and accountability.

Our Governance Commitments

Our Commitment	We will achieve this by
Safeguarding our people and customers	▶ Enhancing information and cybersecurity ▶ Respecting digital human rights ▶ Treating customers fairly ▶ Promoting health, safety, and wellbeing ▶ Ensuring electromagnetic frequencies (EMF) and 5G safety
Embedding ethical and responsible business practices	▶ Promoting ethical conduct ▶ Entrenching fair competition practices ▶ Managing and reducing risks ▶ Committing to compliance
Partnering for an ethical supply chain	▶ Responsible and inclusive procurement ▶ Embedding sustainability across our supply chain

Our Governance Framework

Comprehensive policies and procedures support the core of MTN Uganda's governance framework. At the end of 2024, we had several governance policies in place to support the Board in delivering distinguished service. These policies are overseen by the Board and are designed to ensure compliance, mitigate risks, and promote good conduct across the different functions of the business.

Our governance framework drives our sustainability strategy through organisational effectiveness, informed decision-making, and commitment, led by the Board. The Remuneration, Social and Ethics Committee (**REMCO**) guides performance, standards, and reporting accountability.

This committee provides oversight of the MTN Uganda sustainability strategy and supports seamless coordination at all levels within the organisation.

The Board provides oversight using a combined assurance model that includes management, control functions, internal and external audit, and Board committees. We use a simplified governance approach in complex environments to create shared value with key stakeholders.

Management and Responsible Officers track

ESG initiatives, communicate key learnings to staff, align strategy with responsibilities, and report to the Board. This ensures cohesion and understanding of the sustainability strategy at all levels, supporting implementation of MTN's business model.

As reporting guidelines evolve, MTN remains aligned with stakeholder needs and global trends to ensure comprehensive alignment between our ESG goals and sustainability strategy.

MTN Uganda is set to establish a steering committee, supported by the Board, which will comprise staff from various departments to diversify the body of knowledge on ESG across the organisation. This will also enable us as an entity to take ownership of our strategies at all levels of operation within the organisation.





General Disclosure

MTN Uganda is guided by the Capital Markets (Corporate Governance) Regulations 2025, as well as internal policies and reporting guidelines provided by the MTN Group, to make the necessary disclosures primarily through our published Annual Report. The Board's discharge of its mandate is also assessed against the King IV Code on Corporate Governance.

The Board is committed to continually improving its governance structure and operations in alignment with applicable laws and best governance practices, as outlined in the 2024 Annual Report.

- ▶ Ethical and effective leadership
- ▶ Strategic direction and stewardship
- ▶ Governance risks and opportunities
- ▶ Internal controls and assurance
- ▶ Board composition
- ▶ Ethical and effective leadership
- ▶ Board committee and management effectiveness
- ▶ Technology Governance
- ▶ Stakeholder inclusivity and sustainability

Customer Privacy and Data Security

MTN Uganda recognises the importance of protecting customer privacy and data security in today’s digital landscape. The company operates under the umbrella of the MTN Group’s Data Privacy and Protection Policy, which is aligned with international standards, including ISO 27001 and NIST cybersecurity standards. The policy guides all MTN operations related to the collection, storage, processing, transfer, and disposal of personal information.

Aligned with MTN Group’s **Ambition 2025** strategy, we are committed to leading digital solutions while upholding the highest standards in safeguarding customer data privacy and security. Customer data privacy and security have become essential elements of our business in a world where personal data is integral to maintaining a competitive edge, meeting customer expectations, and fulfilling regulatory demands.

Our proactive approach to customer data privacy is rooted in building trust and confidence among our users, ensuring that their data is protected in accordance with applicable privacy regulations and responsible practices. Our Data Privacy and Protection Policy governs the protection of data.

1

Lawful data collection and processing, ensuring that all customer information is obtained with appropriate consent.

2

Data security controls, including encryption and secure storage mechanisms.

4

Strict compliance with the Uganda Data Protection and Privacy Act 2019

3

Customer information handling procedures, which define the lawful basis for data retention and disposal.

Our data protection and privacy policy also serves as a guiding document for our employees. It emphasises compliance with privacy principles and regulations to protect customer data effectively. The policy outlines how we collect, store, process, transfer, and dispose of personal information and empowers customers to enforce their rights.

Our Data Protection Principles:

Data protection and privacy - our principles	
Openness, transparency, and notice	Responsible persons shall be open and honest with users and ensure that users are provided with clear, prominent, and timely information regarding their identity and data privacy practices. Users shall be provided with information about persons collecting personal information about them, the purposes of an application or service, and about the access, collection, sharing and further use of users’ personal information, including to whom their personal information may be disclosed, enabling users to make informed decisions about whether to use an application or service.
Security	Personal information must be protected using reasonable safeguards that are appropriate to the sensitivity of the information.
Accountability and enforcement	Responsible persons shall ensure compliance with applicable data protection laws and internal policies and procedures.
Purpose and use	The access, collection, sharing, disclosure, and further use of users’ personal information shall be limited to meeting legitimate business purposes, such as providing applications or services as requested by users, or to otherwise meet legal obligations
Children and adolescents	An application or service directed at children and adolescents shall ensure the collection, access and use of personal information are appropriate in all given circumstances and compatible with national law.
Data minimisation and retention	Only the minimum personal information necessary to meet legitimate business purposes and to deliver, provision, maintain, or develop applications and services shall be collected and otherwise accessed and used. Personal data must not be retained for longer than necessary for legitimate business purposes or to fulfill legal obligations, and should be subsequently deleted or rendered anonymous.
Respect user rights	Users shall be provided with information about, and an easy means to exercise, their rights over the use of their personal information.
User choice and control	Users shall be given opportunities to exercise meaningful choice and control over their personal information.
Education	Users shall be provided with information about privacy and security issues and ways to manage and protect their privacy.

Case Study

Project Guardian

We are implementing Project Guardian, a three-year programme on minimum data privacy and data protection controls across the MTN footprint, including third-party stakeholders. Project Guardian consists of 12 workstreams, including governance and operating model, third-party risk management, privacy notices and policies, security for privacy, and change management, among others. The programme provides a blueprint for privacy management and guides compliance in MTN.

The following four pillars drive our vision for data privacy and protection at MTN:

Trusted

MTN should be a trusted custodian of data, inspiring confidence and providing peace of mind to all stakeholders.

Consistent

Have one programme with consistent data privacy and security controls that sets minimum standards across the MTN Group.

Streamlined

Straightforward privacy and protection guidelines and processes that are simple to adopt, use, and enabled through innovation and automation.

Value adding

This programme should add value for our partners and customers, contributing to our commercial success and moving MTN ahead of the curve.



Case Study

Child Online Safety Campaign: Help Children Be Children Campaign

In 2024, MTN Uganda, through the MTN Foundation, launched the second edition of its “Help Children Be Children” campaign in Mukono. This initiative, in partnership with the Maendeleo Foundation and the Internet Watch Foundation (IWF), directly addresses the critical need for child online safety and digital literacy.

MTN recognises both the opportunities and inherent risks associated with the internet. We are committed to creating a safer digital environment. This campaign directly aligns with our Digital Human Rights Strategy and Policy, which prioritises child safety online and combats the distribution of Child Sexual Abuse Material (CSAM).

The campaign empowers parents, educators, caregivers, and children with essential digital literacy skills. It actively strengthens the Africa-wide online child safety portal, a crucial resource for reporting harmful content. This ongoing effort underscores MTN Uganda’s commitment to robust governance and social responsibility, enabling children to explore the digital world with confidence and fostering a safer online future.

This campaign is not just about addressing the challenges of online safety; it’s about building a future where our children can thrive without fear. We applaud MTN Foundation for leading this charge and for its relentless support in making this vision a reality.

Asia Komukama

Executive Director of Maendeleo Foundation

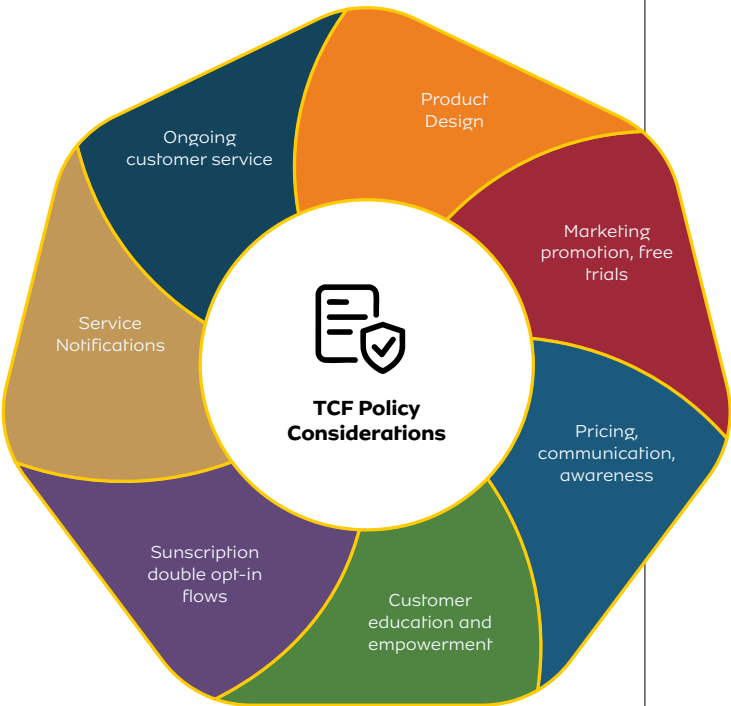


Treating Customers Fairly (TCF)

Treating Customers Fairly (TCF) is at the heart of our business strategy. TCF is a group-wide policy to ensure MTN customers are treated fairly and protected against fraudulent and scam activities.

This policy is effectively enforced through our contracts with our partners, ensuring that TCF principles are adhered to across all services they provide. While the TCF Policy provides overarching principles across the MTN Group, the TCF framework offers a more granular, operational-level guide for implementing these principles consistently across our country operations.

By prioritising TCF, MTN Uganda aims to build long-term customer relationships based on trust and mutual respect, which is crucial for sustainable business growth.



Ethical Supply Chain Management

We are proud of our UGX 73.6 billion spend on women suppliers, an increase from UGX 42.4 billion in 2023. This spend on women suppliers represents 7.5% of our total supplier spend of UGX 980.2 billion in 2024. We are committed to significantly increasing this spend in 2025 and beyond.

MTN Uganda ensures sustainable supply chain management through the MTN Group's Supplier Code of Conduct. This code outlines our commitment to ethical business practices, human rights, fair labour standards, environmental protection, and a zero-tolerance policy for corruption.

We ensure equitable supply chain practices by empowering women suppliers under the Advancing Women Entrepreneurs programme. In 2024, we supported 118 women suppliers, increasing our representation of women suppliers to 11.4%. This reflects our commitment to empowering women in the business world. Through the Advancing Women Entrepreneurs initiative, we are empowering more women to reach our target of 250 women suppliers by 2025.

Our Procurement Responsibilities

We rely on a local and global supply chain to provide our customers with affordable and reliable products and services. We manage our local purchasing and supply chains by enhancing local content and supplier partnerships. To ensure continuity of supply, we proactively manage different legal, social, ethical, and environmental risks.

Following the conclusion of our 2022 Science-based Targets, we communicated our Supplier Code of Conduct and commitment to reducing Scope 3 emissions through Project Zero to our suppliers, requesting their support and alignment.

Our MTN Uganda Procurement Policy includes sustainability clauses that:

- ▶ Embed sustainability requirements in RFPs and contracting
- ▶ ESG considerations when procuring items
- ▶ Third-party audits/verification to ensure supplier alignment
- ▶ Supplier forums to train and award ESG best practices

We have a responsibility to ensure our procurement practices:

- ▶ They are conducted according to local and international laws and standards.
- ▶ Adhere to the highest levels of ethical and moral conduct.
- ▶ Benefit the local economy.
- ▶ Support Net Zero initiatives to reduce emissions.

Building Tomorrow's Supply Chain Today

Our supplier code of conduct outlines our commitment to respecting and promoting human rights and fair labour practices, including equal opportunities, environmentally sustainable business practices, and zero tolerance for bribery and corruption in our external business relations. Notably, under the theme 'Building Tomorrow's Supply Chain Today,' we partnered with over 300 suppliers to build a more resilient, sustainable, and responsive supply chain, enabling us to meet the evolving needs of our customers. With them, we celebrated our ISO 9001:2015 certification, a testament to our rigorous quality management system that ensures excellence in logistics management.



Responsible Tax Citizen

MTN Uganda is one of the leading taxpayers in Uganda, contributing substantially to the national revenue through various direct and indirect taxes. In 2024, the company’s total tax contribution reached UGX 1.3 trillion (approximately USD 352 million). This figure represents a 14.9% increase over the previous year, highlighting MTN’s growing role in the economy and its key contribution to Uganda’s fiscal health.

These taxes include:

Corporate tax:	A 30% tax on profits
Excise duty:	The tax on specific goods and services, including airtime and data, is often 12%.
Value Added Tax (VAT)	Charged at 18% on most goods and services, with zero-rating for exports and specific items.
Withholding tax:	Applied to dividends paid to shareholders, currently at a 15% rate for MTN Uganda.
Other taxes:	This includes various fees and levies, such as operating license fees, payroll taxes, and property taxes.



In addition to these direct taxes, MTN’s operations also generate indirect tax revenue for the government through increased economic activity, job creation, and overall development. In 2024, we contributed a total of US\$1.3 trillion in direct and indirect taxes,

reaffirming our commitment to corporate citizenship and contributing to Uganda’s fiscal and socioeconomic growth. This makes MTN Uganda a valued entity to the government of Uganda as a development partner



Economic Value Creation and Local Empowerment

MTN Uganda drives economic growth by investing in infrastructure, supporting local enterprises, enabling financial inclusion, and fostering digital innovation. Through localisation, job creation, and SME empowerment, we contribute meaningfully to Uganda's economic transformation and digital future.



Doing for growth

Economic Value Creation and Local Empowerment

As a significant player in the telecommunications sector, we recognise our pivotal role in fostering economic growth, not just as a corporate entity, but as a catalyst for positive change in Uganda.



Our Commitment to Growth

We recognise our pivotal role in fostering economic growth, not just as a corporate entity, but as a catalyst for positive change in Uganda.

How We Will Achieve Our Strategic Goals

Enabling the Economy

- Leveraging the latest technologies for use in operations to optimise consumption
- Leveraging energy management solutions to ensure energy efficiency

Empowering Local Enterprises

- Deploying more efficient technologies which optimise energy consumption
- Improving efficiencies and redesigning processes
- Engaging and incentivising our suppliers to commit to achieving Net Zero.

Unlocking Local Ownership

- Engaging and incentivising our suppliers to commit to achieving Net Zero
- Ensuring 80% of our suppliers by spend will have science-based targets by 2026

Creating Value for the Economy — Local Content

Our commitment to localisation provides a tangible layer of economic value in Uganda. MTN has been a crucial driver of digital transformation in the country, with substantial investments in infrastructure, innovation, and partnerships. Our expansion of mobile and fibre network coverage has enhanced internet accessibility across Uganda, enabling us to make a significant contribution to the ICT sector. This also enables the population in Uganda to have increased connectivity, digital inclusion, and digital transformation, which are critical for meeting the goals of Vision 2040 and aligning with our **Ambition 2025** strategy.

Our mobile money service offering has revolutionised financial inclusion, providing millions of Ugandans with access to digital payments and financial services. We have supported several significant national digital transformation projects, including the first national digital census and digital agent payments, which have facilitated efficient data collection and financial transactions.

We are intentional about connecting the whole of Uganda with our infrastructure. To that effect, MTN Uganda has taken note of the demand for increased connectivity in both rural and urban areas of Uganda. MTN has invested significantly in enhancing its IT systems and renovating its existing infrastructure to improve network capacity and coverage nationwide. We have launched programs that will enable us to bring our services closer to the rural population.

Empowering Local Enterprises

We recognise that our success is intertwined with the success of local businesses. By offering ICT services that enhance operational efficiency, providing training to upskill local entrepreneurs, and engaging in responsible procurement practices, we are actively contributing to the growth of local enterprises, job creation, and economic resilience.

We also support SMEs by creating a digitally inclusive environment that helps them overcome the challenges of day-to-day operations. Our MTN MoMo products enable SMEs to access banking and enterprise development services, and our teams provide skill development training to help SMEs pivot from traditional to more digitally savvy business models.

SME Assistance Model

Access to finance to manage cashflow

We support SMEs in accessing finance to better manage their cash flows in the face of reduced revenues.

Access to Markets

We support SMEs in reaching their target customers and creating brand awareness through digital marketing.

Skills Development

We help SMEs pivot from traditional business models to digitally savvy models, enabling them to utilise various digital business tools, solutions, and marketing strategies.

Tailored business connectivity

We offer tailored products and services designed to meet the specific needs of SMEs.

Supporting local businesses, fostering innovation, and ensuring that the benefits of our operations are reinvested in the communities we serve are strategic imperatives that fortify our position as a valuable partner to the government, enterprises, and customers.

04

Strategic Roadmap for Integrated ESG Excellence

Our Promise

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Charting a Course for Integrated Sustainability

MTN has achieved significant growth, but our continued success depends on offering a sustainable future for stakeholders and embedding sustainability as a core business tenet. This commitment underpins our operating strategy, which is centred on shared value and accountability to customers beyond financial interactions.

Our commitment to sustainability involves strengthening governance frameworks, enhancing internal coordination, and promoting meaningful stakeholder engagement. This forward-thinking vision acknowledges our current ESG maturity level

while laying the groundwork for improved, integrated performance across our value chain pillars.

As MTN Uganda grows, we must do so responsibly and transparently, positively transforming the communities we serve. This includes demonstrating responsibility in handling customer data, particularly about digital human rights and cybersecurity. Our outlook provides an honest assessment of our current position, identifies areas for improvement, and reaffirms our commitment to stakeholders and the broader ecosystem.



Together, we're Unstoppable

From Foundational Awareness to Systematic Integration

MTN Uganda's ESG journey is on a path of continuous improvement. An internal ESG gap analysis conducted in 2024 serves as the foundation for our sustainability strategy. Our ambition is to achieve integrated sustainability performance, and we are implementing systematic reforms to reach a 'Strategist' ESG maturity level. This demonstrates foundational readiness but underscores an urgent need for systemic transformation to fully realise our ESG potential.

To navigate this evolution, several key strategic shifts are now underway, focusing on creating a systematic flow and operational awareness internally.

To address this, MTN is considering the following key priority areas:

- Comprehensive Materiality Assessment:** Involving all relevant stakeholders to identify critical ESG issues for MTN Uganda.
- ESG Training and Capacity Building:** Investment in management and employee education at all levels. This includes implementing robust data collection systems to track ESG performance metrics across the organisation.

This strategic realignment will also carefully assess the compatibility of national legislation in our country of operation, such as the Uganda Climate Change Act 2021, the Climate Change Policy 2015, and Uganda's Nationally Determined Contributions (NDCs) 2022, which guide best practices and approaches for key action areas.

We also recognize the critical importance of operating in compliance with and in alignment with local regulatory frameworks, such as the National Environmental Management Authority (NEMA) requirements for environmental audits, as well as our obligations as part of the Uganda Securities Exchange. We aim to continue our stewardship and contribute to the long-term, broader development of our stakeholders by embracing the critical role of leading through our actions.

Internally, this involves broad-based ESG awareness campaigns and targeted capacity-building initiatives across departments to localise the relevance of ESG, ensuring that every department understands how it contributes to the broader sustainability ambition. We are strategically focused on integrating ESG indicators into departmental Key Performance Indicators (KPIs), particularly within our customer service and technical teams.

- ESG Steering Committee:** Dedicated oversight and coordination body to enhance coordination and ensure accountability for ESG activities across all departments.
- IFRS S1 and S2 Adoption:** Framework and standard for effective integration of ESG metrics with financial planning and strategic risk management.
- Environmental and Social Management System (ESMS):** Comprehensive procedures and policies for monitoring day-to-day operations across all sites.
- ISO Certifications:** Relevant ISO certifications (ISO 14001 for environmental management, ISO 45001 for occupational health and safety, building on our existing ISO 9001 for quality management in warehouses) will be pursued to institutionalize these critical processes further.

Future Goals and Priorities (2025-2030): Actioning Our Commitments

Creating Value for the Economy — Local Content

As MTN advances in its sustainability journey, setting clear, measurable goals is essential for driving progress and accountability. These goals will guide our actions, ensuring they align with our commitment to creating shared value for our stakeholders. Building on insights from our materiality assessment, our goals will chart a course for becoming more responsible and sustainable.

The following principles guide our goal-setting process:





Enhanced Environmental Leadership

Focus:

Minimising environmental footprint and aligning with national environmental regulations.

Key Initiatives:

Project Zero Expansion	Transition of a greater number of network sites to renewable energy sources and explore how customers can be empowered to adopt energy-efficient technologies.
Project Infinity Scaling	Enhance refurbishment and reuse of network equipment to maximum potential, potentially sharing with other OpCos if needed.
E-waste Collection Programs	Enable staff and customers to participate in responsible recycling. We strive to establish strategic partnerships with the private sector and government to learn how we can improve and address the challenges of e-waste.
Energy Efficiency Alignment	Align targets with upcoming national legislation on energy efficiency, emissions regulations, the Uganda Climate Change Act, and NDCs, ensuring our contribution to the country's broader environmental commitments.



Social Impact Amplification

Focus:

Enhancing societal well-being and fostering inclusivity.

Key Initiatives:

Child Protection Enhancement	Bolster the Help Children Be Children campaign for online child safety
Project Guardian	Data privacy protection focus
MTN Foundation Expansion	Continue ACE skilling and Internet Bus programs for digital inclusion, especially in hard-to-reach areas. This will also be achieved through strategic partnerships.
Health and Safety Management	Establish a comprehensive health and safety management system. This includes forming a functional Health and Safety Committee and developing specific Standard Operating Procedures (SOPs) for incident management, first aid, and defining roles like fire marshals.
DEI Initiatives	Deepen our internal initiatives around diversity, equity, and inclusion programs alongside employee well-being, tailored towards practical mental health awareness campaigns



Governance Excellence Enhancement

Focus:
Strengthening ethical leadership and accountability, moving beyond compliance towards creating value across our value chain.

Key Initiatives:

Implementation	Strengthen ESG governance through the adoption of the King IV standards framework for corporate governance, which will help the Board set its own ESG goals and KPIs to deepen its oversight of ESG within MTN.
ESG Board Integration	Board ESG KPIs and performance measurement
IFRS S1/S2 Adoption	International sustainability disclosure standards
Third-party Assurance	External verification of ESG data and claims to enhance credibility
Ethical Business Practices	Responsible artificial intelligence deployment across products, risk management, can further contribute to sustainability and ethical practices across our products.
Transparency and Compliance	With Regulatory bodies and Tax contributions.



Economic Development Acceleration

Focus:
Driving inclusive growth and value creation

Key Initiatives:

Local Content Enhancement	Increase local suppliers from 63% to 75%
Strategic CSI	Enhance Corporate Social Investment approach for greater impact and diligently measure our economic impact through job creation and dedicated support for local enterprises
Innovation and Technology Transfer	Digital skills and entrepreneurship support
Community Investment	Strengthened through expanded MTN Foundation programming

Anticipated Challenges and Risk Mitigation

As MTN Uganda embarks on this transformative ESG journey, we anticipate several key risks and challenges that require proactive management. These include

Key Challenges	Mitigation Strategy
ESG Data Collection and Quality Assurance: Implementing unified reporting protocols	To address this, we are implementing unified reporting protocols, streamlining data collection processes, increasing transparency about how data is used, and consistently engaging with teams to share reports where their data is featured, thereby reinforcing the gravity of the information. To achieve this, we are on a journey to implement an ESMS system for better coordination of environmental and social programs/operations across the business.
Internal Awareness and Ownership: Organization- wide sensitization programs	Our strategy directly confronts this through organization-wide sensitization programs and awareness sessions tailored to show each department how they can incorporate and contribute to the ESG agenda in their specific roles. This includes the deliberate integration of ESG KPIs into departmental objectives.
Stakeholder Engagement: Enhanced customer involvement in sustainability initiatives	Plans to address this include targeted campaigns to involve customers more actively in sustainability efforts (e.g., e-waste recycling, energy solutions) and to communicate our ESG progress more clearly and effectively.
Regulatory Uncertainty: Enhanced customer involvement in sustainability initiatives	We are building robust internal systems to track, align with, and ensure compliance with local legal and regulatory developments related to sustainability. By learning from past experiences, we aim to ensure proactive adherence to national environmental and social compliance requirements, while being responsible to all our stakeholders.
Governance Maturity: Building a values-driven governance model through the King IV assessment	Tools such as the King IV assessment will be instrumental in aligning our governance practices with overarching sustainability objectives, enabling the Board to set its targets and KPIs for ESG. This involves building robust internal structures that can withstand external changes and challenges by having clearly defined targets and transparent accountability frameworks.



Ensuring Delivery on Our Promises

ESG accountability will be rigorously enforced at operational and governance levels, ensuring our ambitions translate into tangible results. Each ESG initiative will have specific metrics, expected outputs, and measurable outcomes. Regular reporting against set targets, based on an established ESG index, will reinforce ownership and shared responsibility across all teams.

Building Tomorrow's Supply Chain Today

Governance Level:
Quarterly ESG performance reviews and board-level KPIs

Stakeholder Feedback:
Annual Reputation Index integration with ESG metrics

Operational Level:
Regular reporting against set targets based on the established ESG index

External Verification:
Third-party assurance for ESG reporting credibility



A Commitment to Shared, Sustainable Progress

MTN Uganda's ESG Future Outlook reflects our commitment to sustainable, inclusive, and responsible business growth, driven by our belief that everyone deserves the benefits of a modern, connected world. From improving governance and addressing past shortcomings with honesty to advancing green energy solutions and empowering communities, we embrace ESG complexity with clarity of purpose and unwavering resolve.

As regulatory environments evolve and stakeholder expectations rise, our journey involves continual learning, transparent

communication, and shared progress. The company demonstrates a willingness to adopt robust frameworks and set clear targets.

We reaffirm a core belief: sustainability is not a separate agenda; it is the agenda. It ensures the company's long-term health by making a positive impact on the environment and the communities in which we operate. **By consistently "Doing for Planet," "Doing for People," "Doing it Right," and "Doing for Growth," MTN Uganda can catalyze lasting positive change in Uganda and serve as a benchmark across the continent.**



05

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Supporting Documentation and Verification Framework

Appendix A: Performance Data Tables

Performance metrics

Pillar	KPI	Measurement	2022	2023	2024
	Carbon footprint	tCO2e (Scope 1&2)	4,814	4,643	4,225
		Energy Consumption (GJ)		130,862	123,740
		Energy sites upgraded with renewable energy	2,649	3,241	3,339
	Waste	Total waste collection (Kgs)	74,284	53,751	87,260
		Waste recycled or repurposed out of the total waste collected (%)	3.2	3.4	2.6
	Water consumption	Water consumption (m3)	54,043	49,909	64,363
Pillar	KPI	Measurement	2022	2023	2024
	Workplace and employee	Women in Total Workforce (%)	49.4	51.0	48.4
		Women in executive Management (%)	35.6	38.0	38.0
		Number of employees	1,262	1,349	1,323
	Connectivity	5G Network coverage (%)		0.3	15.3
		4G Network coverage (%)	80.0	85.1	87.9
		Fibre coverage (km)	9,418	12,072	17,774
		Fibre-home connections	4,000	8,300	10,500

Pillar	KPI	Measurement	2022	2023	2024
	Digital inclusion	Data subscribers	6.7 million	8.2 million	10.1 million
		Uganda Communications Commission's Universal Service and Access Fund contribution (UGX)	-	36 billion	2.5 billion
		Smartphones sold through device financing collaboration	178,400	495,900	463,493
		Smartphone penetration	86,000	86,000	86,000
	Financial inclusion	MTN Momo transactions value (UGX)	92.3 billion	133.2 billion	158.6 billion
		MTN Momo Transactions	2.7	3.4	4.3
		Total value of loans disbursed (UGX)	279.7 billion	569 billion	1.5 trillion
		MTN Momo Agents	166,200	155,000	212,500
		MTN Momo subscribers	11.0 million	12.7 million	13.8 million
	MTN Foundation	Total corporate social investment (UGX)	3.9 billion	4.4 billion	4.6 billion
	MTN Foundation (Yello Care)	Number of direct beneficiaries	2,012	3,231	8,873
	MTN Foundation (ACE Program)	Number of Youth Trained	87	285	-

Pillar	KPI	Measurement	2022	2023	2024
 Doing for people	MTN Foundation (MTN Skills Academy)	Number of courses completed		1,882	1,994
	MTN Foundation (Girls With Tools & Girls in Tech)	Number of Youth Trained	280	527	427
	MTN Foundation (Digital Access)	Number of schools connected with inclusive digital tools	406 Children with Disability (CWD)	381 CWDs	16,000 (PEAS)
		Number of Children with disability reached			
	MTN Foundation (Digital Literacy)	Number of digital literacy outreaches No of women and youth trained	1,325	1,358	1,216
	MTN Foundation (MTN Change Makers)	Number of beneficiaries			70,344
	MTN Foundation (Access to Health Care)	Number of beneficiaries			32,000
	MTN Foundation (Y'ello Hope)	Number of displaced people supported after Kiteezi landfill disaster			1,000
	MTN Foundation (School Infrastructure)	Number of Learners	780	104	120

Pillar	Award Recognition	2022	2023	2024
 Doing it right	Award Recognition	Consumer and Industrial Products Financial Reporting Category at the Institute of Certified Public Accountants of Uganda Financial Reporting Awards	First Runner-Up – Consumer and Industrial Products Financial Reporting Category at the Institute of Certified Public Accountants of Uganda 2023 Financial Reporting Awards	Winner – Best Listed Entity Reporting Award at the Institute of Certified Public Accountants of Uganda 2024 Financial Reporting Awards
			Winner – Chief Financial Officer of the Year, 7th Edition of the Association of Chartered Certified Accountants and Deloitte Uganda Chief Financial Officer Awards	Winner – Presentation and Communication Award at the Institute of Certified Public Accountants of Uganda 2024 Financial Reporting Awards
			Winner – Prudential Uganda Best Human Resources Practices Survey 2023	First Runner-Up [MTN Uganda Limited] – Top 100 Leading Companies in Uganda, CEO East African Magazine
				First Runner-Up – Consumer and Industrial Products Financial Reporting Category at the Institute of Certified Public Accountants of Uganda 2024 Financial Reporting Awards
				Second Runner-Up [MTN Mobile Money Uganda Limited] – Top 100 Leading Companies in Uganda, CEO East African Magazine
				Winner [MTN Uganda Limited] – Most admired CEOs in Uganda, CEO East African Magazine

Pillar	Award Recognition	2022	2023	2024
	Award Recognition			Second Runner-Up [MTN Mobile Money Uganda Limited] – Most admired CEOs in Uganda, CEO East African Magazine
				Million Dollar Award – Best OpCo of the Year, MTN Global Leadership Gathering
				Group President and CEO Award – y'ello Care, MTN Global Leadership Gathering
				CEO of the Year Award, MTN Global Leadership Gathering
				Value Based Capital Allocation Award, MTN Global Leadership Gathering

Pillar	KPI	2022	2023	2024
	Local supplier spend (UGX)		804.7 billion	980.2 billion
	Total Number of suppliers	1590	1,796	1,973
	Number of Local suppliers	990	1,117	-
	Women suppliers spend (UGX)	46 billion	42.4 billion	73.6 billion
	Women owned suppliers	73	186	-
	Tax contribution (UGX)	927 billion	1.1 trillion	1.3 trillion



Appendix B: Acronyms

4IR	Fourth Industrial Revolution
AI	Artificial Intelligence
AML/CFT	Anti-Money Laundering/Combating the Financing of Terrorism
API	Application Programming Interface
BTS	Base Transceiver Station
CHASE	Coverage, Handsets, Affordability, Service bundling, Education, and Ease of access (MTN's framework)
COSO	Committee of Sponsoring Organizations of the Treadway Commission
CSI	Corporate Social Investment
CSAM	Child Sexual Abuse Material
DEI	Diversity, Equity, and Inclusion
DIT	Directorate of Industrial Training –Ministry of Education and Sports
EMF	Electromagnetic Frequencies
e-NPS	Employee Net Promoter Score
ESG	Environmental, Social, and Governance
EXCO	Executive Committee
FY	Financial Year
GDP	Gross Domestic Product
GHG	Green House Gas
GOU	Government of Uganda
GRI	Global Reporting Initiative
GSMA	Global System for Mobile Communications Association

IFRS	International Financial Reporting Standards
IPP	Independent Power Production
IoT	Internet of Things
ISSB	International Sustainability Standards Board
ISO	International Organization for Standardization
IWF	Internet Watch Foundation
KPIs	Key Performance Indicators
KYC	Know Your Customer
MoMo	Mobile Money
MoU	Memorandum of Understanding
MW	Megawatts
NCDC	National Curriculum Development Centre
NDCs	Nationally Determined Contributions
NEMA	National Environmental Management Authority
NGOs	Non-Governmental Organizations
PEAS	Promoting Equality in African Schools
REMCO	Remuneration, Social and Ethics Committee
RFP	Request for Proposals
SBTi	Science-based Targets Initiative
SDGs	Sustainable Development Goals
SMEs	Small and Medium-sized Enterprises
SOPs	Standard Operating Procedures
TCF	Treating Customers Fairly
tCO2e	Tonnes of Carbon Dioxide Equivalent
UCUSAF	Uganda Communications Universal Service and Access Fund
UGX	Ugandan Shilling
UN SDGs	United Nations Sustainable Development Goals
VIP	Latrines: Ventilated Improved Pit latrines
VoIP	Voice over Internet Protocol

Appendix C: Global Reporting Initiative (GRI) Content Index

Statement
of use

MTN Uganda has reported the information cited in this GRI content index for the reporting period from 31st December 2022 and end 31st December 2024 with reference to the GRI Standards.

GRI 1 used

GRI 1: Foundation 2021

GRI STANDARD	DISCLOSURE	PAGE
GRI 2: General Disclosures 2021		
2-1	Organizational details	10-33
2-2	Entities included in the organizations’ sustainability reporting	N/A
2-3	Reporting period, frequency and contact point	10
2-4	Restatements of information	12-33
2-5	External assurance	N/A
2-6	Activities, value chain and other business relationships	12-33
2-7	Employees	106 -115
2-8	Workers who are not employees	N/A
2-9	Governance structure and composition	Refer to Annual Report
2-10	Nomination and selection of the highest governance body	Refer to Annual Report
2-11	Chair of the highest governance body	12-14
2-12	Role of the highest governance body in overseeing the management of impacts	12- 14 112- 115
2-13	Delegation of responsibility for managing impacts	Refer to Annual Report

GRI STANDARD	DISCLOSURE	PAGE
2-14	Role of the highest governance body in sustainability reporting	112- 115. Refer to Annual Report
2-15	Conflicts of interest	112- 115. Refer to Annual Report
2-16	Communication of critical concerns	N/A
2-17	Collective knowledge of the highest governance body	12- 14. Refer to Annual Report
2-18	Evaluation of the performance of the highest governance body	Refer to Annual Report
2-19	Remuneration policies	Refer to Annual Report
2-20	Process to determine remuneration	Refer to Annual Report
2-21	Annual total compensation ratio	Refer to Annual Report
2-22	Statement on sustainable development strategy	26-27, 38- 43. Refer to MTN Group Sustainability Report
2-23	Policy commitment	26 -27. Refer to MTN Group Sustainability Report
2-24	Embedding policy commitment	26-27
2-25	Processes to remediate negative impacts	N/A
2-26	Mechanisms for seeking advice and raising concerns	N/A
2-27	Compliance with laws and regulations	10- 33
2-28	Membership associations	N/A
2-29	Approach to stakeholder engagement	42
2-30	Collective bargaining agreements	N/A
GRI 3: Material Topics 2021		
3-1	Process to determine material topics	38 -39. Refer to MTN Group Sustainability Report
3-2	List of material topics	39. Refer to MTN Group Sustainability Report
3-3	Management of material topics	38-43. Refer to MTN Groups Sustainability Report

GRI STANDARD	DISCLOSURE	PAGE
GRI 101: Biodiversity 2024		
101-1	Policies to halt and reverse biodiversity loss	N/A
101-2	Management of biodiversity impacts	N/A
101-3	Access and benefit-sharing	N/A
101-4	Identification of biodiversity impacts	N/A
101-5	Locations with biodiversity impacts	N/A
101-6	Direct drivers of biodiversity loss	N/A
101-7	Changes to the state of biodiversity	N/A
101-8	Ecosystem services	N/A
GRI 102: Climate Change 2025		
102-1	Transition plan for climate change mitigation	N/A
102-2	Climate change adaptation plan	N/A
102-3	Just transition	N/A
102-4	GHG emissions reduction targets and progress	48- 57
102-5	Scope 1 GHG emissions	54
102-6	Scope 2 GHG emissions	54
102-7	Scope 3 GHG emissions	56-57
102-8	GHG emissions intensity	N/A
102-9	GHG removals in the value chain	N/A
102-10	Carbon credits	N/A
GRI 103: Energy 2025		
103-1	Energy policies and commitments	48-58
103-2	Energy consumption and self-generation within the organization	48-58
103-3	Upstream and downstream energy consumption	N/A

GRI STANDARD	DISCLOSURE	PAGE
103-4	Energy intensity	N/A
103-5	Reduction in energy consumption	48-58
GRI 201: Economic Performance 2016		
201-1	Direct economic value generated and distributed	82-85, 126-127
201-2	Financial implications and other risks and opportunities due to climate change	N/A
201-3	Defined benefit plan obligations and other retirement plans	N/A
201-4	Financial assistance received from government	N/A
GRI 202: Market Presence 2016		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	N/A
202-2	Proportion of senior management hired from the local community	N/A
GRI 203: Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	82-85, 126- 127
203-4	Significant indirect economic impacts	76-79, 126 –127
GRI 204: Procurement Practices 2016		
204-1	Proportion of spending on local suppliers	121
GRI 205: Anti-corruption 2016		
205-1	Operations assessed for risks related to corruption	N/A
205-2	Communication and training about anti-corruption policies and procedures	N/A
205-3	Confirmed incidents of corruption and actions taken	N/A
GRI 206: Anti-competitive Behavior 2016		
206-2	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	N/A

GRI STANDARD	DISCLOSURE	PAGE
GRI 207: Tax 2019		
207-1	Approach to tax	122
207-2	Tax governance, control, and risk management	113,122
207-3	Stakeholder engagement and management of concerns related to tax	42, 122
207-4	Country-by-country reporting	N/A
GRI 301: Materials 2016		
301-1	Materials used by weight or volume	N/A
301-2	Recycled input materials used	62- 63
301-3	Reclaimed products and their packaging materials	N/A
GRI 302: Energy 2016		
302-1	Energy consumption within the organization	48-51
302-2	Energy consumption outside of the organization	56-57
302-3	Energy intensity	N/A
302-4	Reduction of energy consumption	48-57
302-5	Reductions in energyrequirements of products and services	N/A
GRI 303: Water and Effluents 201		
303-1	Interactions with water as a shared resource	66,68- 69
303-2	Management of water discharge-related impacts	68- 69
303-3	Water withdrawal	N/A
303-4	Water discharge	N/A
303-5	Water consumption	68-69
GRI 304: Biodiversity 2016		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	N/A

GRI STANDARD	DISCLOSURE	PAGE
304-2	Significant impacts of activities, products and services on biodiversity	N/A
304-3	Habitats protected or restored	N/A
304-4	UCN Red List species and national conservation list species with habitats in areas affected by operations	N/A
GRI 305: Emissions 2016		
305-1	Direct (Scope 1) GHG emissions	54- 55
305-2	Energy indirect (Scope 2) GHG emissions	54- 55
305-3	Other indirect (Scope 3) GHG emissions	54- 55
305-4	GHG emissions intensity	54- 55
305-5	Reduction of GHG emissions	54- 55
305-6	Emissions of ozone-depleting substances (ODS)	N/A
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	N/A
GRI 306: Effluents and Waste 2016		
306-1	Significant spills	N/A
GRI 306: Waste 2020		
306-1	Waste generation and significant waste- related impacts	62-65
306-2	Management of significant waste-related impacts	62-65
306-3	Waste generated	N/A
306-4	Waste diverted from disposal	62-65
306-5	Waste directed to disposal	N/A
GRI 308: Supplier Environmental Assesment 2016		
308-1	New suppliers that were screened using environmental criteria	N/A
308-2	Negative environmental impacts in the supply chain and actions taken	66- 67

GRI STANDARD	DISCLOSURE	PAGE
GRI 401: Employment 2016		
401-1	New employee hires and employee turnover	N/A
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	N/A
401-3	Parental leave	87
GRI 402: Labor/Management Relations 2016		
402-1	Minimum notice periods regarding operational changes	N/A
GRI 403: Occupational Health and Safety 2018		
403-1	Occupational health and safety management system	87
403-2	Hazard identification, risk assessment, and incident investigation	N/A
403-3	Occupational health services	N/A
403-4	Worker participation, consultation, and communication on occupational health and safety	N/A
403-5	Worker training on occupational health and safety	N/A
403-6	Promotion of worker health	86- 89
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships management system	N/A
403-8	Workers covered by an occupational health and safety management system and incident investigation	N/A
403-9	Work-related injuries	N/A
403-10	Work-related ill health	86- 89
GRI 404: Training and Education 2016		
404-1	Average hours of training per year per employee	N/A
404-2	Programs for upgrading employee skills and transition assistance programs	N/A
404-3	Percentage of employees receiving regular performance and career development reviews	N/A

GRI STANDARD	DISCLOSURE	PAGE
GRI 405: Diversity and Equal Opportunity 2016		
405-1	Diversity of governance bodies and employees	86- 89
405-2	Ratio of basic salary and remuneration of women to men	86- 89
GRI 406: Non-discrimination 2016		
406-1	Incidents of discrimination and corrective actions taken	N/A
GRI 407: Freedom of Association and Collective Bargaining 2016		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	N/A
GRI 408: Child Labor 2016		
408-1	Operations and suppliers at significant risk for incidents of child labor	N/A
GRI 409: Forced or Compulsory Labor 2016		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	N/A
GRI 410: Security Practices 2016		
410-1	Security personnel trained in human rights policies or procedures	N/A
GRI 411: Rights of Indigenous Peoples 2016		
411-1	Incidents of violations involving rights of indigenous peoples	N/A
GRI 413: Local Communities 2016		
413-1	Operations with local community engagement, impact assessments, and development programs	74-79, 82-83, 96- 108, 126- 127
413-2	Operations with significant actual and potential negative impacts on local communities	N/A
GRI 414: Supplier Social Assessment 2016		
414-1	New suppliers that were screened using social criteria	121
414-2	Negative social impacts in the supply chain and actions taken	N/A

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STANDARD

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PAGE

GRI 415: Public Policy 2016

415:-1	Political contributions	N/A
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GRI 416: Customer Health and Safety 2016

416-1	Assessment of the health and safety impacts of product and service categories	116-120
416-1	Incidents of non-compliance concerning the health and safety impacts of products and services	N/A

GRI 417: Marketing and Labeling 2016

417-1	Requirements for product and service information and labeling	116-120
417-1	Incidents of non-compliance concerning product and service information and labeling	N/A
417-1	Incidents of non-compliance concerning marketing communications	N/A

GRI 418: Customer Privacy 2016

418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	N/A
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