



**Application for confidentiality in terms of section 4D of the  
Independent Communications Authority of South Africa Act 13  
of 2000 ("ICASA Act")**

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**1. Applicant / Licensee Name**

Mobile Telephone Networks Proprietary Limited ("MTN")

**2. Documents containing confidential information**

MTN's application to apply for radio frequency spectrum licences for International Mobile Telecommunication (IMT) Spectrum bands, IMT700, IMT800, IMT2600 AND IMT3500.

**3. Name and other details of the document containing confidential information**

**Title: APPLICATION FOR INTERNATIONAL MOBILE TELECOMMUNICATIONS IN RESPECT OF THE PROVISION OF MOBILE BROADBAND WIRELESS ACCESS SERVICES FOR URBAN AND RURAL AREAS USING THE COMPLEMENTARY BANDS, IMT700, IMT800, IMT2600 AND IMT3500.**

**Applicant:** Mobile Telephone Networks Proprietary Limited Registration number: 1993/001436/07.

**Date:** 31 January 2021

**Volume:** 1, 2A, 2B, 2C, 3, 4, 5 and 6

4. Reasons why specific information in the document is considered confidential

| Chapter/page paragraph/line | Line    | Specific information                                    | Reason for requesting confidentiality  |
|-----------------------------|---------|---|--|
| Volume 1 Chapter 1          |         |   |  |
| Chapter 1 page 6            | 17 - 22 | Section 1.3 Compliance with the requirements of the ITA | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines for Confidentiality Request in Terms of Section 4D of the ICASA Act, published by ICASA (the "Guidelines"), provides that this category of information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in |

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|                  |        |   | commercial competition. The information set out in line 17 to 22 on page 6 concerns the strategic information of MTN South Africa, which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. Specifically, paragraph 1.3 deals with those lot categories which MTN intends to bid on and sets out those lot categories which MTN believes it will acquire as a result of the auction process. In addition, the public disclosure of this information may result in a contravention of the confidentiality restrictions contemplated in the ITA. For this reason, this information has been marked as confidential by MTN South Africa. |
| Chapter 1 page 8 | 5 – 16 | Section 1.4 bullet points under Exhibit 1 | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category of information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions.   |

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|                   |    |   | <p>Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in <b>[line 6 to 16 of page 8]</b> concerns the strategic information of MTN South Africa, which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. The information set out in the bullet points under Exhibit 1 information includes highlights of MTN's ambition 2025 strategy. For this reason, it has been marked as confidential by MTN South Africa.</p> |
| Chapter 1 page 12 | 18 | 1.5 Highlights of the marketing plan bullet points under "Highlights of the MTN marketing plan include... | <p>Section 4D of the ICASA Act provides that ICASA must treat the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to the ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's</p>  |

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|                   |         |   | marketing plan is highly sensitive and MTN South Africa takes reasonable measures to keep such information confidential. The information set out in the bullet point under section 1.5, includes highlights of MTN South Africa's marketing plan and strategy. For this reason, it has been marked as confidential by MTN South Africa.   |
| Chapter 1 page 18 | Exhibit | Exhibit 2: Applicant's employees at the end of each calendar year | Section 4D of the ICASA Act provides that ICASA must treat the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to the ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's business plan is highly sensitive and MTN South Africa takes reasonable measures to keep such information confidential. The information set out in Exhibit 2, includes details of MTN South Africa's business plan. Specifically, Exhibit 2 sets out a list of the number of employees MTN South Africa intends to |

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|                   |      |   | <p>employ over a 10-year period. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair commercial advantage over MTN South Africa. For this reason, it has been marked as confidential by MTN South Africa.</p>  |
| Chapter 1 page 20 | 2-18 | <p>1.10 Highlights of the business plan and economic efficiency bullet points under <i>"Highlights of the business and financing plan section include:"</i></p> | <p>Section 4D of the ICASA Act provides that ICASA must treat the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to the ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's business plan is highly sensitive and MTN South Africa takes reasonable measures to keep such information confidential. The information set out in line 2 -18 on page 20, includes details of MTN South Africa's business plan and economic efficiency. For this reason, it has been marked as</p> |



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|                           |         |  | confidential by MTN South Africa.  |
| Chapter 1 page 20         | 22 - 32 | 1.10 Highlights of the business plan and economic efficiency last 3 paragraphs | Section 4D of the ICASA Act provides that ICASA must treat the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to the ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's business plan is highly sensitive and MTN South Africa takes reasonable measures to keep such information confidential. The information set out in 1.10, includes details of MTN South Africa's business plan and economic efficiency and financial assumptions. For this reason, it has been marked as confidential by MTN South Africa. |
| <b>Volume 1 Chapter 2</b> |         |  |  |
| Chapter 2-page 36         | 17 - 20 | 2.2 Mandatory information<br>Graham de Vries email                             | The personal information of persons must be protected in accordance with the provisions of the Protection of Personal Information Act 4 of 2013. MTN South Africa respects and   |

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|                   |       | address and mobile number and Moses Mashisane email address and mobile number | protects the personal information of its executives, directors and employees and intends to ensure that such personal information is not disclosed to the public. Disclosure of such personal information into the public domain may have unintended consequences for the persons to whom such personal information relates which may adversely affect how such person's personal information is utilised and/or shared. The information set out in paragraph 2.2 includes the personal information of Graham de Vries and Moses Mashisane, including their names, email addresses and personal contact details, for this reason, MTN South Africa has marked this information as confidential. |
| Chapter 2 page 60 | 7 - 9 | 2.4.9 Partners' experience and expertise                                      | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines for Confidentiality Request in Terms of Section 4D of the ICASA Act, published by ICASA (the "Guidelines"), provides that this category of information may include the names of third   |

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|                   |         |                                       | <p>parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. In addition, in terms of commercial contract terms and conditions between MTN and its partners, MTN is not at liberty to disclose any information relating to its contracts including whether or not MTN has a contractual relationship with a partner without the partners written consent. It is for this reason, MTN South Africa has marked this information in 2.4.9 as confidential.</p> |
| Chapter 2 page 61 | Exhibit | Exhibit 8: MTN's partners' experience | <p>Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines for Confidentiality Request in Terms of Section 4D of the ICASA Act, published by ICASA (the "Guidelines"), provides that this category of information may include the names of third</p>   |

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|                   |         |  | <p>parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. In addition, in terms of commercial contract terms and conditions between MTN and its partners, MTN is not at liberty to disclose any information relating to its contracts including whether or not MTN has a contractual relationship with a partner without the partners written consent. It is for this reason, MTN South Africa has marked this information in exhibit 8 as confidential.</p> |
| Chapter 2 page 62 | Exhibit | Exhibit 9: MTN's suppliers' experience | <p>Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines for Confidentiality Request in Terms of Section 4D of the ICASA Act, published by ICASA (the "Guidelines"), provides that this category of information may include the names of third</p>   |

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|                   |         |  | <p>parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. In addition, in terms of commercial contract terms and conditions between MTN and its suppliers, MTN is not at liberty to disclose any information relating to its contracts including whether or not MTN has a contractual relationship with a supplier without the suppliers written consent. It is for this reason, MTN South Africa has marked this information in exhibit 9 as confidential.</p> |
| Chapter 2 page 63 | 14 - 23 | 2.4.11 Contractors' experience and expertise | <p>Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines for Confidentiality Request in Terms of Section 4D of the ICASA Act, published by ICASA (the "Guidelines"), provides that this category of information may include the names of third</p>  |

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|                   |            |  | <p>parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. In addition, in terms of commercial contract terms and conditions between MTN and its contractors, MTN is not at liberty to disclose any information relating to its contracts including whether or not MTN has a contractual relationship with a contractor without the contractors written consent. It is for this reason, MTN South Africa has marked this information in 2.4.11 as confidential.</p> |
| Chapter 2 page 64 | Exhibit 10 | Exhibit 10: Experience of top majority-owned Black contractors | <p>Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines for Confidentiality Request in Terms of Section 4D of the ICASA Act, published by ICASA (the "Guidelines"), provides that this category of information may include the names of third</p>   |

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|                   |         |  | <p>parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. In addition, in terms of commercial contract terms and conditions between MTN and its contractors, MTN is not at liberty to disclose any information relating to its contracts including whether or not MTN has a contractual relationship with a contractor without the contractors written consent. It is for this reason, MTN South Africa has marked this information in exhibit 10 as confidential.</p> |
| Chapter 2 page 66 | Exhibit | Exhibit 11: Board of directors' Personal addresses and email addresses of board of directors | <p>The personal information of persons must be protected in accordance with the provisions of the Protection of Personal Information Act 4 of 2013. MTN South Africa respects and protects the personal information of its executives, directors and employees and intends to ensure that such personal information is not disclosed to the public. Disclosure of such personal information into the public domain may have</p>  |

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|                   |         |   | <p>unintended consequences for the persons to whom such personal information relates which may adversely affect how such person's personal information is utilised and/or shared. The information set out in Exhibit 11 includes the personal information of certain MTN South Africa directors, including the names, email addresses and personal addresses of such directors and, for this reason, MTN South Africa has marked this information as confidential.</p>   |
| Chapter 2 page 70 | Exhibit | Exhibit 12: Executive committee Personal addresses and email addresses of executive committee members | <p>The personal information of persons must be protected in accordance with the provisions of the Protection of Personal Information Act 4 of 2013. MTN South Africa respects and protects the personal information of its executives, directors and employees and intends to ensure that such personal information is not disclosed to the public. Disclosure of such personal information into the public domain may have unintended consequences for the persons to whom such personal information relates which may adversely affect how such person's personal information is utilised and/or shared. The information set out in Exhibit 12 includes the personal information of certain members of MTN South</p> |



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|                         |         |                                  | Africa's executive committee, including the names, email addresses and personal addresses of such members and, for this reason, MTN South Africa has marked this information as confidential.  |
| Chapter 2 page 96 - 100 | Exhibit | Exhibit 29: Employee projections | Section 4D of the ICASA Act provides that ICASA must treat the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to the ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's business plan is highly sensitive and MTN South Africa takes reasonable measures to keep such information confidential. The information set out in Exhibit 29, includes details of MTN South Africa's business plan. Specifically, Exhibit 29 sets out a list of the number of employees MTN South Africa intends to employ over a 10-year period. For this reason, it has been marked as confidential by MTN South Africa. |

| Volume 1 Chapter 3 |                   |   |  |
|--------------------|-------------------|---|--|
| Chapter 3 page 104 | 10-12 and 15 - 16 | 3.1 Introduction<br><br>Bullets points 6, 7 and 9 | <p>Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in paragraph 3.1 concerns the highlights of MTN's marketing plan which is strategic information of MTN South Africa, which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. Specifically, paragraph 3.1 includes information regarding MTN's customer strategy. For this reason, this information has been marked as confidential by MTN South Africa.</p> |

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| Chapter 3 page 112 | 1 - 7   | 3.2.3 Results of consumer market research (NPS study) second sentence in the last paragraph before figure MTN Customer Experience | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in paragraph 3.2.3 concerns confidential consumer market research obtained by MTN, which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa. |
| Chapter 3 page 112 | Exhibit | Exhibit 35 MTN Customer Experience: NPS November 2021 Monthly   | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or  |

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|                    |         | IPSOS Report<br>(Confidential Internal Report)  | other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in exhibit 35 is derived from confidential NPS reports obtained by MTN, which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa. |
| Chapter 3 page 113 | Exhibit | <i>Exhibit 36 - MTN Customer Experience (Detail) NPS November 2021 Monthly IPSOS Report (Confidential Internal Report</i> | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the   |

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|                    |       |   | <p>names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in exhibit 36 is derived from confidential NPS reports obtained by MTN, which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa.</p> |
| Chapter 3 page 114 | 1 - 5 | The first and second paragraph after exhibit 36 | <p>Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South</p>   |

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|                    |         |   | <p>Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information for which MTN requests confidentiality discusses exhibit 37 which is derived from an internal confidential NPS report obtained by MTN, which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa.</p>   |
| Chapter 3 page 114 | Exhibit | Exhibit 37 - MTN Customer Experience (Value, Network Readiness) November 2021 Monthly IPSOS Report (Confidential Internal Report) | <p>Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over</p> |

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|                    |        |   | <p>MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in exhibit 37 MTN Customer Experience (Value, Network Readiness) is derived from an internal confidential report obtained by MTN, which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa.</p>  |
| Chapter 3 page 115 | 1 – 13 | 3.2.4 Understanding the consumer and segmentation second paragraph first sentence | <p>Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in 3.2.4</p> |

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|                    |         |  | discusses MTN's customer segmentation, which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa.   |
| Chapter 3 page 116 | Exhibit | Exhibit 38: MTN Customer Experience (Value, Network Readiness) | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in exhibit 38 MTN Customer Segmentation, is derived from a confidential internal report which, if disclosed, would result in MTN South Africa's competitors obtaining an economic |



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|                    |         |   | <p>advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa.</p>   |
| Chapter 3 page 117 | Exhibit | Exhibit 39 MTN Customer Segmentation policy framework | <p>Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in exhibit 39 MTN Customer Segmentation, is derived from a confidential internal report which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa.</p> |
| Chapter 3 page 119 | Exhibit | Exhibit 40 - MTN                                      | <p>Section 4D of the ICASA Act provides that ICASA must treat</p>   |

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|                    |         | Business IoT Vertical<br>Focus Area           | <p>the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to this ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's business plan is highly sensitive and MTN takes reasonable measures to keep such information confidential. The information set out in exhibit 40 includes details of MTN South Africa's IoT verities focus areas. For this reason, it has been marked as confidential by MTN South Africa.</p> |
| Chapter 3 page 120 | Exhibit | Exhibit 41 - MTN as a IoT connectivity leader | <p>Section 4D of the ICASA Act provides that ICASA must treat the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to this ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair</p>   |

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|                    |         |                                      | commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's business plan is highly sensitive and MTN takes reasonable measures to keep such information confidential. The information set out in exhibit 41 includes details of MTN South Africa's IoT connectivity strategy. For this reason, it has been marked as confidential by MTN South Africa.   |
| Chapter 3 page 122 | Exhibit | Exhibit 43: MTN Competitor Landscape | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in exhibit 43 MTN competitor landscape, if disclosed, would result in |

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|                    |         |  | MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa.   |
| Chapter 3 page 123 | Exhibit | Exhibit 44: SA Mobile Subscribers Market Share | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in exhibit 44 MTN competitor landscape, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa. |
| Chapter 3 page 127 | Exhibit | Exhibit 46: MTN's                              | Section 4D of the ICASA Act provides that ICASA must treat  |

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|                    |         | strategic position within the business segment | information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in exhibit 46 details MTN's competitor landscape, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa. |
| Chapter 3 page 128 | Exhibit | Exhibit 47: The “What” and “How” of the IoT    | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in  |

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|                           |                |   | commercial competition, as confidential. The Guidelines provides that this category information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out in exhibit 47 sets out what IOT is and how MTN intends to leverage IOT to develop new industry products, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa. |
| Chapter 3 page 129 to 142 | Entire section | Section 3.4 Market and MTN customer and revenue forecast – entire section including exhibits 48 to 61 | Section 4D of the ICASA Act provides that ICASA must treat the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to this ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair  |

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|                             |         |                                       | commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's business plan is highly sensitive and MTN takes reasonable measures to keep such information confidential. The information set out section 3.4 includes a detailed analysis of MTN's customer and revenue forecast. For this reason, it has been marked as confidential by MTN South Africa.   |
| Chapter 3 page 145<br>- 146 | Exhibit | Exhibit 63 and 64 – MTN Marketing Mix | Section 4D of the ICASA Act provides that ICASA must treat the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to this ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's business plan is highly sensitive and MTN takes reasonable measures to keep such information confidential. The information set out exhibit 63 sets out MTN's marketing mix. For this reason, it has been marked as confidential by MTN |

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|                             |                |  | South Africa.   |
| Chapter 3 page 149<br>- 160 | Entire section | Section 3.6 5G-enabled<br>new services and<br>opportunities entire<br>section and exhibits 65 to<br>73 | Section 4D of the ICASA Act provides that ICASA must treat the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to this ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's business plan is highly sensitive and MTN takes reasonable measures to keep such information confidential. The information set out section 3.6 discusses those 5G services and opportunities available to MTN and which MTN intends to leverage in the market. For this reason, it has been marked as confidential by MTN South Africa. |
| Chapter 3 page 164          | Exhibit        | Exhibit 77 MTN South<br>Africa's Distribution<br>Approach  | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines as including formula, practice, process, design, instrument, pattern, commercial method, or   |



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|                    |        |  | <p>compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in exhibit 77 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. MTN takes reasonable measures to keep such information confidential. The information set out exhibit 77 sets out MTN's distribution strategy. For this reason, it has been marked as confidential by MTN South Africa.</p>     |
| Chapter 3 page 165 | 6 - 18 | 3.9.1 Plans for remote areas all bullet points | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out 3.9.1 sets out MTN's plans for distribution in remote areas. For this reason, it has been marked as confidential by MTN South Africa.</p> |

| Volume 1 Chapter 4           |                |   |  |
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| Chapter 4 page 173<br>to 274 | Entire chapter | Chapter 4 Technical Plan<br>- whole chapter | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in Chapter 4 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, Chapter 4 contains information regarding, amongst other things, MTN's network architecture design and approach to spectral efficiency. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.</p> |

| Volume 1 Chapter 5        |                |   |  |
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| Chapter 5 page 277 to 342 | Entire Chapter | Chapter 5 Coverage and Rollout plan – whole chapter | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in Chapter 5 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, Chapter 5 contains information regarding, amongst other things, MTN's spectrum deployment strategy and coverage planning methodology. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.</p> |

| Volume 1 Chapter 6 |        |   |   |
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| Chapter 6 page 347 | 9 – 18 | 6.2.2 A transformational business strategy and work programme<br>Second paragraph | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out on section 6.2.2 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, these pages deal with MTN South Africa's strategies concerning customer growth and retention, as well as the strengthened processes and technology optimisations implemented by MTN South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure. |

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| Chapter 6 page 349 to 352 | Exhibit | Exhibit 143 The transformational Siyakhula programme | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out on Exhibit 143 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, these pages deal with MTN South Africa's strategies concerning customer growth and retention, as well as the strengthened processes and technology optimisations implemented by MTN South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure. |
| Chapter 6 page 353        | 1 -11   | 6.2.3 Delivering EPIC                                | Section 4D of the ICASA Act provides that ICASA must treat  |

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|                    |          | customer experience                         | trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out on 6.2.3 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, these pages deal with MTN South Africa's strategies concerning customer growth and retention, as well as the strengthened processes and technology optimisations implemented by MTN South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure. |
| Chapter 6 page 354 | Exhibits | Exhibit 144: Customer 360      Exhibit 145: | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in   |

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|                    |         | <p>Contract 360</p> <p>Exhibit 146: Billing 360</p> | <p>the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in Exhibit 144, 145 and 146 - Customer 360 (in Chapter 6) includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, this Exhibit depicts MTN South Africa's strategies concerning customer growth and retention, as well as the strengthened processes and technology optimisations implemented by MTN South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.</p> |
| Chapter 6 page 355 | Exhibit | <p>Exhibit 147: Sample agent screen</p>             | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process,</p>  |

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|                    |         |   | <p>design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in Exhibit 147- Sample agent screen (in Chapter 6) includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, this Exhibit depicts MTN South Africa's strategies concerning customer growth and retention, as well as the strengthened processes and technology optimisations implemented by MTN South Africa in respect of its agents in South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests.</p> |
| Chapter 6 page 356 | Exhibit | Exhibit 148: Sample real-time dashboard | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or</p>   |



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|                    |         |   | <p>compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in Exhibit 148- Sample real-time dashboard (in Chapter 6) includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, this Exhibit depicts MTN South Africa's strategies concerning customer growth and retention, as well as the strengthened processes and technology optimisations implemented by MTN South Africa in respect of its agents in South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests.</p> |
| Chapter 6 page 358 | Exhibit | Exhibit 150: End-to-end customer journey and life cycle | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or</p>   |

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|                    |       |   | <p>reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in Exhibit 150 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, these pages deal with MTN South Africa's strategies concerning customer growth and retention, as well as the strengthened processes and technology optimisations implemented by MTN South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.</p> |
| Chapter 6 page 358 | 4 - 6 | 6.2.4 The customer journey plan Paragraph below exhibit 150 | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business</p>   |

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|                    |         |  | <p>can obtain an economic advantage over competitors or customers. The information set out in the paragraph below exhibit 150 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, these pages deal with MTN South Africa's strategies concerning customer growth and retention, as well as the strengthened processes and technology optimisations implemented by MTN South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.</p> |
| Chapter 6 page 359 | Exhibit | Exhibit 151: MTN iLula front- and back-office capabilities | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or</p>  |

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|                    |       |  | customers. The information set out in exhibit 151 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, exhibit 151 deals with MTN South Africa's iLula system capabilities and represents one of MTN's customer journey strategies. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure. |
| Chapter 6 page 368 | 1 -10 | 6.2.7.5 Contact centre systems whole section | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.2.7.5 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa.       |

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|                    |         |                          | Specifically, 6.2.7.5 sets out the systems used in MTN South Africa's contact centre. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.  |
| Chapter 6 page 372 | Exhibit | Exhibit 153: MTN Insight | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in Exhibit 153 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, Exhibit 153 depicts the dashboard of MTN South Africa's business monitoring tool, MTN Insight. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an |

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|                    |         |                                   | economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.  |
| Chapter 6 page 378 | Exhibit | Exhibit 155: Key business drivers | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines for Confidentiality Request in Terms of Section 4D of the ICASA Act, published by ICASA (the "Guidelines"), provides that this category of information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. Exhibit 155 sets out the key business drivers within MTN customer operations. It is for this reason, MTN South Africa has marked this information as confidential. |

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| Chapter 6 page 379 | Exhibit | Exhibit 156: Customer care, billing, and provisioning architecture | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in exhibit 156 sets out MTN's customer care, billing and provisioning architecture and includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure. |
| Chapter 6 page 380 | Exhibit | Exhibit 157: Generic BSS system components and text below          | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or  |

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|                    |       |  | <p>compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in exhibit 157 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, exhibit 157 sets out the systems used in MTN South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.</p> |
| Chapter 6 page 381 | 4- 12 | 6.4.3.1 Product catalogue<br>First paragraph | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.1 includes trade</p>  |



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|                    |         |   | secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.1 sets out the elements on MTN South Africa's product catalogue. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.   |
| Chapter 6 page 383 | 27 - 37 | 6.4.3.6 Order management<br><br>Last paragraph above convergent billing | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.6 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.6 speaks to MTN South Africa's order management process. Disclosure of such trade secrets into |

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|                    |          |                            | the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.  |
| Chapter 6 page 383 | 38 to 50 | 6.4.3.7 Convergent billing | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.7 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.7 speaks to MTN South Africa's billing process. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure. |

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| Chapter 6 page 384 | 1 - 6  | 6.4.3.8 Mediation | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.8 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.8 speaks to MTN South Africa's mediation process. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure. |
| Chapter 6 page 384 | 7 - 11 | 6.4.3.9 Rating    | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or  |

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|                    |        |                  | <p>compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.9 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.9 speaks to MTN South Africa's rating process. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.</p> |
| Chapter 6 page 385 | 1 - 10 | 6.4.3.11 Billing | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.11 includes trade</p>   |

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|                    |         |                          | secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.11 speaks to MTN South Africa's billing process. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.  |
| Chapter 6 page 385 | 11 - 25 | 6.4.3.12 Bill formatting | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.12 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.12 speaks to MTN South Africa's billing format. Disclosure of such trade secrets into the public |

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|                    |                       |                                | domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.   |
| Chapter 6 page 385 | 26 to 37 and 40 to 47 | 6.4.3.13 Collection management | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.13 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.13 speaks to MTN South Africa's collection management process. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure. |

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| Chapter 6 page 386 | 11 - 16 | 6.4.3.15 Receivables         | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.15 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.15 speaks to MTN South Africa's receivables process. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure. |
| Chapter 6 page 387 | 7 - 22  | 6.4.3.19 Workflow management | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or  |

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|                    |         |   | <p>compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.19 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.19 speaks to MTN South Africa's workflow management process. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.</p> |
| Chapter 6 page 387 | 31 - 55 | <p>6.4.3.20 Omni-channel CRM</p> <p>All bullet points</p> | <p>Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in 6.4.3.20 includes trade</p>  |



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|                    |         |  | secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, 6.4.3.20 speaks to MTN South Africa's OMNI channel customer relationship management process. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.   |
| Chapter 6 page 390 | Exhibit | Exhibit 158: Credit management process | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in exhibit 158 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, exhibit 158 speaks to MTN South Africa's |

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|                           |                |   | credit management process. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.   |
| <b>Volume 1 Chapter 7</b> |                |   |   |
| Chapter 7-page 393 to 429 | Entire chapter | Chapter 7 Business and Financing Plan – whole chapter | Section 4D of the ICASA Act provides that ICASA must treat the business plans of a licensee as confidential information. Any information relating to or forming part of MTN South Africa's business plan in relation to this ITA must be treated as confidential. The disclosure of such information may prejudice MTN South Africa's commercial interests and may result in MTN South Africa's competitors obtaining an unfair commercial advantage over MTN South Africa. The Information contained in or related to MTN South Africa's business plan is highly sensitive and MTN takes reasonable measures to keep such information confidential. The information set out Chapter 7 includes details of MTN South Africa's business plan. Specifically, Chapter 7 includes information pertaining to MTN South Africa's costs, |

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|                                 |                   |                            | profitability, margins, capital expenditure, working capital, free cash flow, enterprise value, funding requirements, financing strategy, business plan execution risk and economic efficiency. For this reason, it has been marked as confidential by MTN South Africa.  |
| <b>Volume 2 A</b>               |                   |                            |   |
| Volume 2 A page 450 to page 567 | Entire Appendix A | Appendix A – site database | Section 4D of the ICASA Act provides that ICASA must treat trade secrets as confidential. Trade Secrets are defined in the Guidelines, as including formula, practice, process, design, instrument, pattern, commercial method, or compilation of information not generally known or reasonably ascertainable by others or by which a business can obtain an economic advantage over competitors or customers. The information set out in Volume 2 Appendix A includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa. Specifically, volume 2 A contains a database of all MTN sites across South Africa. Disclosure of such trade secrets into the public domain may result in MTN South Africa's competitors obtaining an economic advantage over |

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|                                 |               |   | MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.  |
| <b>Volume 3</b>                 |               |   |   |
| Volume 3 page 1334 to page 1661 | Entire volume | <p>MTN SA audited financial statements 2018</p> <p>MTN SA audited financial statements 2019</p> <p>MTN SA audited financial statements 2020</p> | <p>Section 4D of the ICASA Act provides that ICASA must treat the financial information, other than trade secrets, of a person where the disclosure of such financial information is likely to cause harm to the commercial or financial interest of such person, as confidential. MTN South Africa takes reasonable measures to protect against the disclosure of its financial information into the public domain as such disclosure would likely negatively impact on the financial and/or commercial interests of MTN South Africa. The information set out in Volume 3 includes financial information pertaining to MTN South Africa which, if disclosed, would likely result in a negative impact on the financial and/or commercial interests of MTN South Africa. Specifically, Volume 3 with MTN South Africa's audited financial statements for financial years 2018, 2019 and 2020. For this reason, this information has been marked as confidential by MTN South Africa.</p> |

| Volume 5   |                             |  |  |
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| Volume 5 Appendix A (Application form) Pages 2286 and 2288 | Table of Board of Directors | Board of Directors email and personal addresses. | The personal information of persons must be protected in accordance with the provisions of the Protection of Personal Information Act 4 of 2013. MTN South Africa respects and protects the personal information of its executives, directors and employees and intends to ensure that such personal information is not disclosed to the public. Disclosure of such personal information into the public domain may have unintended consequences for the persons to whom such personal information relates which may adversely affect how such person's personal information is utilised and/or shared. The information set out in Volume 5 Appendix A (application form) includes the personal information of certain MTN South Africa directors and/or executives, including the names, email addresses and personal addresses of such directors and/or executives and, for this reason, MTN South Africa has marked this information as confidential. |
| Volume 5 Appendix A 2292                                   | Table of lot categories     | Selection of auction categories                  | Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be  |

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|  |  |  | <p>expected to put a person at a disadvantage in contractual or other negotiations, or which may prejudice the person in commercial competition, as confidential. The Guidelines for Confidentiality Request in Terms of Section 4D of the ICASA Act, published by ICASA (the "Guidelines"), provides that this category of information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions. Disclosure of such information may result in MTN South Africa's competitors obtaining an economic advantage over MTN South Africa and may prejudice MTN South Africa in commercial competition. The information set out Appendix A of volume 5 on page 2351 concerns the strategic information of MTN South Africa, which, if disclosed, would result in MTN South Africa's competitors obtaining an economic advantage over MTN. Specifically, Appendix A deals with those bid categories which MTN intends to bid on and sets out those lot categories which MTN believes it will acquire as a result of the auction process. In addition, the public disclosure of this information may result in a contravention of the</p> |
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|  |  |  | confidentiality restrictions contemplated in the ITA. For this reason, this information has been marked as confidential by MTN South Africa. |
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