



**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

			<p>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.</p>
Chapter 1 page 8	5 – 16	Section 1.4 bullet points under Exhibit 1	<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 of information may include the names of third parties with which a person has contracted, the value of contractual agreements or pricing provisions.</p>

			<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 [line 6 to 16 of page 8] 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>

			<p>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.</p>
Chapter 1 page 18	Exhibit	Exhibit 2: Applicant's employees at the end of each calendar year	<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 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</p>

			<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>

			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.
Volume 1 Chapter 2			
Chapter 2-page 36	17 - 20	2.2 Mandatory information 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

		<p>address and mobile number and Moses Mashisane email address and mobile number</p>	<p>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.</p>
Chapter 2 page 60	7 - 9	<p>2.4.9 Partners' experience and expertise</p>	<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>

			<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>

			<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>

			<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>

			<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>

			<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>

			<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>

			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 Bullets points 6, 7 and 9	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.
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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

		IPSOS Report (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

			<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>

			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.
Chapter 3 page 114	Exhibit	Exhibit 37 - MTN Customer Experience (Value, Network Readiness) November 2021 Monthly IPSOS Report (Confidential Internal Report)	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>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>

			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

			advantage over MTN. For this reason, this information has been marked as confidential by MTN South Africa.
Chapter 3 page 117	Exhibit	Exhibit 39 MTN Customer Segmentation policy framework	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.
Chapter 3 page 119	Exhibit	Exhibit 40 - MTN	Section 4D of the ICASA Act provides that ICASA must treat

		Business IoT Vertical Focus Area	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 verticals focus areas. For this reason, it has been marked as confidential by MTN South Africa.
Chapter 3 page 120	Exhibit	Exhibit 41 - MTN as a IoT connectivity leader	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 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

			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

		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

			<p>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.</p>
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	<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>

			<p>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.</p>
<p>Chapter 3 page 145 - 146</p>	<p>Exhibit</p>	<p>Exhibit 63 and 64 – MTN Marketing Mix</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 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</p>

			South Africa.
Chapter 3 page 149 - 160	Entire section	Section 3.6 5G-enabled new services and opportunities entire section and exhibits 65 to 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 Africa's Distribution 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

			<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

<p>Chapter 4 page 173 to 274</p>	<p>Entire chapter</p>	<p>Chapter 4 Technical Plan - whole chapter</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 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>
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Volume 1 Chapter 5

Chapter 5 page 277 to 342	Entire Chapter	Chapter 5 Coverage and Rollout plan – whole chapter	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.
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Volume 1 Chapter 6

Chapter 6 page 347	9 – 18	6.2.2 A transformational business strategy and work programme 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

		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

		<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>

			<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>

			<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>

			<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>

			<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>

			<p>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.</p>
Chapter 6 page 368	1 -10	6.2.7.5 Contact centre systems whole section	<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 6.2.7.5 includes trade secrets as defined in the Guidelines and, for this reason, has been marked as confidential by MTN South Africa.</p>

			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

			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.

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

			<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 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>

			<p>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.</p>
Chapter 6 page 383	27 - 37	<p>6.4.3.6 Order management</p> <p>Last paragraph above convergent billing</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 6.4.3.6 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</p>

			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.

Chapter 6 page 384	1 - 6	6.4.3.8 Mediation	<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 6.4.3.8 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.</p>
Chapter 6 page 384	7 - 11	6.4.3.9 Rating	<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>

			<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>

			<p>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.</p>
Chapter 6 page 385	11 - 25	6.4.3.12 Bill formatting	<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 6.4.3.12 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</p>

			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.

Chapter 6 page 386	11 - 16	6.4.3.15 Receivables	<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 6.4.3.15 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.</p>
Chapter 6 page 387	7 - 22	6.4.3.19 Workflow management	<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>

			<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>

			<p>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.</p>
Chapter 6 page 390	Exhibit	Exhibit 158: Credit management process	<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 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</p>

			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.
Volume 1 Chapter 7			
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,

			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.
Volume 2 A			
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

			MTN South Africa and accordingly MTN South Africa's commercial interests would be prejudiced by such disclosure.
Volume 3			
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

<p>Volume 5 Appendix A (Application form) Pages 2286 and 2288</p>	<p>Table of Board of Directors</p>	<p>Board of Directors email and personal addresses.</p>	<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 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.</p>
<p>Volume 5 Appendix A 2292</p>	<p>Table of lot categories</p>	<p>Selection of auction categories</p>	<p>Section 4D of the ICASA Act provides that ICASA must treat information, which when disclosed, could reasonably be</p>

			<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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