

February 29, 2012

Sifiso Dabengwa
MTN Group President and CEO
Private Bag 9955
Cresta
2118
South Africa

Re: MTN and Iran

Dear Mr. Dabengwa,

United Against Nuclear Iran (“UANI”) is in receipt of MTN Group Ltd.’s (“MTN”) letter dated February 24, 2012. Unfortunately, MTN’s response is unsatisfactory in its substance and indicates that MTN is seemingly oblivious to the massive human rights crisis currently ongoing in Iran. The letter also fails to address a number of serious issues raised in UANI’s letter of January 25, 2012.

MTN’s letter fails to respond to evidence of Iran’s routine use of telecommunications equipment to illegally track, monitor, and in some cases arrest, detain, and torture Iranian citizens opposed to the current extremist regime. More specifically, MTN’s letter also fails to refute the fact that the Iranian regime, the majority 51% holder of Irancell and partner of MTN, “has exploited the network and telecommunications technology of MTN Irancell to monitor and track the activities and communications of peaceful dissidents in Iran.” Finally, MTN’s letter fails to respond to UANI’s inquiries regarding multiple reports of collaboration by MTN Irancell and the Iranian regime, including reports that MTN Irancell ordered the Chinese telecommunications firm Huawei to suspend text messaging and block the phone service Skype during protests against the fraudulent presidential elections in 2009.

As you may know, on February 28, 2012 Amnesty International published its most recent report on the human rights crisis in Iran. The report describes in vivid detail how the Iranian regime has engaged in a ruthless campaign against the citizens of Iran in order to suppress peaceful opposition:

For those ending up in Iran’s prisons and detention centres, torture and other ill-treatment remain routine and widespread. Former detainees ... recount being beaten, including on the soles of their feet, sometimes while suspended upside down... They have told of being raped - sometimes with implements – including

by other prisoners, or threatened with rape. (*Amnesty International*, “We are Ordered to Crush You: Expanding Repression of Dissent in Iran,” February 2012)

MTN’s February 24th letter states that “MTN seeks to ensure that our corporate values of respect for human rights are reflected in the way we do business and *we expect all our partners to adhere to these fundamental principles* [emphasis added].” Yet MTN is a 49% shareholder of MTN Irancell, and the majority 51% is in turn owned by the Iranian regime. This means that MTN’s “partner” in MTN Irancell is the Iranian regime. MTN cannot credibly contend that the Iranian regime shows a sufficient “respect for human rights” in light of the heinous human rights violations described above.

In addition, given MTN’s relationship with the regime, MTN’s assertion that it is a “liberating force,” “enriching the lives” of Iranians is completely untenable. MTN cannot reasonably assert that the substantial profits it earns from its growing role in the Iranian telecommunications market are merely a byproduct of a larger altruistic goal to empower the citizens of Iran and the developing world. If MTN was truly interested in empowering the Iranian people, it would not partner with the regime that oppresses them, and it would surely not carry out orders from the regime to shut off communications during times of popular protest.

Recent reports in the news media regarding MTN’s Iran business further belie MTN’s assertion that its business in Iran is altruistic or ethical in nature. For example, reports state that MTN Irancell is partially owned by Iran Electronics Industries (IEI), an entity that has been sanctioned by the United States and European Union as ‘engaged in proliferation activities and their support networks.’ MTN Irancell’s other Iranian partial owner is the Mostazafan Foundation of Islamic Revolution, a “Bonyad” organization directly supervised by Iran’s Supreme Leader. Both IEI and Mostazafan are closely linked to the regime’s radical Islamic Revolutionary Guard Corps (“IRGC”), which serves as caretaker of Iran’s ballistic missile and nuclear weapons programs and is the key instrument used to suppress Iran’s internal pro-democracy movement. Moreover, the report states that MTN initially gained access to the Iranian market and subsequently secured its current 49% stake in MTN Irancell by assuring the regime it would pressure the South African government into supporting Iran’s nuclear program. (*Mail and Guardian*, “MTN in Bed with Iran’s Military,” February 10, 2012)

In light of reports regarding the nature of MTN’s partners in MTN Irancell and MTN’s corrupt entry into the Iranian market, UANI insists MTN take this opportunity to reconsider its collaboration with the regime and immediately take steps to end its Iran business. Please be advised that UANI will take any and all action to ensure MTN takes such action, including by contacting MTN customers, shareholders and affiliated partners. MTN’s direct partnership with sanctions-designated Iranian entities and complicity in the regime’s heinous human rights violations are exposing MTN, its investors and other stakeholders to serious and irrevocable reputational harm.

Please let us hear from you by March 10, 2012 regarding MTN's existing and future business plans in Iran.

Very truly yours,



Ambassador Mark D. Wallace

- cc: The Honorable Joseph I. Lieberman
Chairman, United States Senate Committee on Homeland Security &
Governmental Affairs
- The Honorable Susan M. Collins
Ranking Member, United States Senate Committee on Homeland Security &
Governmental Affairs
- The Honorable John Kerry
Chairman, United States Senate Committee on Foreign Relations
- The Honorable Richard Lugar
Ranking Member, United States Senate Committee on Foreign Relations
- The Honorable Jon Tester
United States Senate
- The Honorable Peter T. King
Chairman, United States House Committee on Homeland Security
- The Honorable Bennie Thompson
Ranking Member, United States House Committee on Homeland Security
- The Honorable Ileana Ros-Lehtinen
Chairman, United States House Committee on Foreign Affairs
- The Honorable Howard Berman
Ranking Member, United States House Committee on Foreign Affairs
- The Honorable Howard P. McKeon
Chairman, United States House Armed Services Committee
- The Honorable Adam Smith
Ranking Member, United States House Armed Services Committee

The Honorable Henry Waxman
Ranking Member, United States House Committee on Energy and Commerce

The Honorable Steve Israel
United States House of Representatives

The Honorable Ted Deutch
United States House of Representatives

The Honorable Nita Lowey
United States House of Representatives

The Honorable Carolyn Maloney
United States House of Representatives

The Honorable Gary Ackerman
United States House of Representatives

The Honorable Rob Andrews
United States House of Representatives

The Honorable Steve Chabot
United States House of Representatives

The Honorable Gerry Connolly
United States House of Representatives

The Honorable Henry Cueller
United States House of Representatives

The Honorable Susan Davis
United States House of Representatives

The Honorable Tim Griffin
United States House of Representatives

The Honorable Jim Himes
United States House of Representatives

The Honorable Kathy Hochul
United States House of Representatives

The Honorable Rush Holt
United States House of Representatives

The Honorable Jerry Nadler
United States House of Representatives

The Honorable Bill Owens
United States House of Representatives

The Honorable Ed Perlmutter
United States House of Representatives

The Honorable Adam Schiff
United States House of Representatives

The Honorable Betty Sutton
United States House of Representatives

The Honorable Bob Turner
United States House of Representatives

The Honorable Leon E. Panetta
Secretary of Defense, United States Department of Defense

The Honorable David S. Cohen
Under Secretary for Terrorism and Financial Intelligence, United States
Department of the Treasury

The Honorable Adam Szubin
Director, Office of Foreign Assets Control

H.E. Ebrahim Rasool
Ambassador of South Africa to the United States

H.E. Baso Sangqu,
Permanent Representative of South Africa to the United Nations

Jyoti Desai
Senior Vice President, Technology & Information Systems, MTN Group

Jamal Ramadan
Regional Vice President, Middle East & North Africa Region, MTN Group

Shauket Fakie
Group Executive, Business Risk Management, MTN Group

M. Cyril Ramaphosa
Independent Non-Executive Chairman of the Board, MTN Group