MOBILE TELECOMMUNICATIONS COMPANY (ZAIN)

ENVIRONMENTAL, SOCIAL AND GOVERNANCE MONITORING (ESG) POLICY

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Documentation Authorization Control Sheet

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Custodian	Corporate Governance
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Version	Date	Author	Approved By	Comments
1	2024	CG	Board of Directors	Established ESG policy according to CG responsibilities regarding the international indices
1.2	2026	CG	Board of Directors	**Updated based on the separation of roles of the Governance & Compliance departments**

Contents

Environmental, Social, and Governance (ESG) Policy

1. Purpose

The purpose of this policy is to establish a framework for monitoring and evaluating the Environmental, Social, and Governance (ESG) scores assigned to Mobile Telecommunications Company KSCP, "Zain Group"/The Company by international indices, including but not limited to MSCI, FTSE, and S&P. This policy aims to ensure that the Company maintains high standards of corporate governance, labor management and sustainability practices, aligning with its strategic goals and compliance requirements.

2. Scope

This policy applies to business units within Zain Group. It encompasses all actions related to the monitoring, reporting, and management of ESG scores provided by recognized international ESG rating agencies.

3. Policy Owner

The Corporate Governance Department is the owner of this ESG Monitoring Policy, responsible for its implementation, ongoing updates, and adherence.

4. Definitions

ESG Scores: Ratings provided by third-party agencies that measure a company's performance across three categories: Environmental, Social, and Governance.

International Indices: Recognized global rating systems and frameworks that provide ESG scores, such as MSCI, FTSE, and S&P.

5. Responsibilities

5.1 Corporate Governance and Compliance Department

The Corporate Compliance Department is responsible for monitoring adherence to applicable laws, regulations, and internal policies related to ESG. The Corporate Governance Department leads the oversight, coordination, and implementation of ESG requirements across the Group, ensuring alignment with corporate values, best practices, and regulatory expectations, and reports to the Board on ESG-related developments, requirements, and progress.

- **Monitoring**: Regularly track and review ESG scores from indices such as MSCI, FTSE, and S&P.
- **Data Collection**: Collect and verify the accuracy of the data submitted to ESG rating agencies.
- **Analysis**: Analyze ESG reports and ratings to identify areas of improvement and relevant risks.
- **Reporting**: Compile and present detailed reports on ESG performance to the Board of Directors. Additionally, inform the Board of rating updates on an annual basis.
- **Action Plans**: Develop and implement action plans to improve ESG scores based on analysis by working with internal and external stakeholders, such as the Board of Directors, Zain Group functions and departments and other stakeholders as needed.

- **Stakeholder Communication**: Communicate ESG scores and related developments internally and externally as appropriate.
- **Awareness**: Increase employees' awareness of ESG practices and their roles in supporting them.
- **Review**: Revise this policy and recommend amendments to the Board for their approval.

5.2 Board of Directors

- **Approval**: Approve this ESG Monitoring Policy and any significant amendments.
- **Oversight**: Review and assess the effectiveness of the policy and associated practices.
- **Strategic Guidance**: Provide strategic guidance on aligning ESG objectives with corporate goals.

5.3 Internal Stakeholders

- **Report**: All internal stakeholders are required to report accurate information in a timely manner according to deadlines. It is the responsibility of the function/department to guarantee the accuracy of all information submitted for this purpose.
- **Compliance**: Internal stakeholders shall ensure that the external stakeholders are compliant with relevant ESG requirements (including but not limited to: Supplier Code of Conduct, Related Party Transactions, Anti-Corruption, Whistleblowing, Sanctions, Stakeholders Protections, Human Rights, etc)
- **Communicate**: Zain Group departments shall communicate with subsidiaries or suppliers or any other stakeholders when needed to compile all information from respective operations and ensure an accurate reflection of the function's performance in the relevant area.

6. Revisions

This policy will be reviewed when needed if significant changes occur in reporting standards or in the operating environment.

7. Approval

This policy has been approved by the Board of Directors of Zain Group.

8. Accompanying Procedures

Accompanying this policy, detailed procedures have been developed to provide specific guidelines and step-by-step actions necessary for the effective implementation of the ESG Monitoring Policy. These procedures outline the responsibilities at different levels of the organization, specify reporting formats, and describe the processes for data collection, analysis, and remedial actions. The Corporate Governance Department will ensure these procedures are accessible, understood, and followed by all relevant staff. These procedures will be reviewed and updated concurrently with any amendments to this policy to ensure alignment and consistency. These procedures are approved by the Chief Corporate Affairs and Communications Officer.