MOBILE TELECOMMUNICATIONS COMPANY (ZAIN)

STAKEHOLDERS' RIGHTS PROTECTION POLICY

1. Introduction

Mobile Telecommunications Company (hereinafter referred to as Zain or the Company) is committed to protecting the rights of all stakeholders and to creating wealth, jobs and sustainability of a financially sound enterprise. As part of the Company's corporate governance framework, the purpose of the Stakeholders' Rights Policy (hereinafter the "Policy") is to assure that the rights of stakeholders as established by relevant laws and regulations are respected and protected by the Company.

Therefore, the Company's Board of Directors is responsible for setting the standards for the protection of the rights of all stakeholders and for updating these standards as and when appropriate, to reflect changes in the provisions of the laws, bylaws and instructions issued by regulatory entities. The purpose of this Policy is to reflect the Company's efforts in protecting the rights of all stakeholders.

1.1 Scope

This Policy applies to the Company and its subsidiaries, Board of Directors, executive management and employees as each party has the duty of protecting the rights of stakeholders of the Company. It is essential that all Directors, management and employees understand the requirements of this Policy and applicable laws and regulatory requirements carefully and comply with its contents.

Wherever the provisions of this Policy document differ with any of the local statutory or regulatory requirements, the local statutory and regulatory requirements will take precedence over the provisions of this Policy.

for circulation of soft copies of this manual are to be made only to the BOD.

1.2 Policy Revisions

To ensure that the company operates in a manner consistent with its status, the Corporate Governance Department shall conduct a review as and when needed. The review shall consider the level of compliance with the laws and regulations, the continuing suitability of the policy and the need for modifications in alignment with Corporate Compliance Department, however deemed necessary. The board shall have the authority to approve this policy solely.

2. General Responsibilities

An effective Board oversight and supervisory role is the mainstay of a sound corporate governance framework. The Company's Board of Directors, therefore, has the key responsibility of protecting the rights of its stakeholders.

The major responsibilities of the Company's Board towards its stakeholders are:

- ***To appoint competent executive management***
- ***To effectively and efficiently supervise the Company's affairs***
- ***To adopt sound policies***
- ***To remain abreast of the Company's conditions and performance***
- ***To maintain reasonable capitalization of the Company***
- ***To observe laws, by-laws and instructions***

3. The Company's Stakeholders

3.1 Shareholders

Creation and maximization of shareholder wealth is the Company's primary objective. (for more information, refer to ***Shareholders' Rights Protection Policy***).

3.2 Regulators

Zain Group is committed to adhering to the laws, by-laws and instructions issued by Capital Markets Authority (hereinafter "CMA"), and any other applicable instructions..

3.3 Customers

It is the Company's mission to deliver world-class products and services to its customers, whether clients or investors. The Company's growth, regionally and internationally, is mainly driven by customers' trust in the Company and by the Company's continued effort to deliver excellent customer service.

The Company is also committed to investing in information technology to improve alternative delivery channels and e-services capabilities to boost the Company's customer service experience.

Furthermore, the Company is always keen to address customers' concerns and complains. This is achieved through improved customer communication and enhanced customer complaint processing and response. Moreover, customer communication is enhanced through adding new communication channels enabling customers to reach support at any time.

The Company is committed to maintain equal and fair treatment of its customers. This is reflected through customers' services policy, services/ products quality controls and effective communication channels with all customers.

3.4 Employees

3.4.1 Security , Compensation, and Professional Development

Zain Group is deeply committed to growing national work force in all relevant fields across the Company. The Company is focused on implementing professional development and training programs while targeting recruiting efforts at hiring and training the country's best and brightest minds. The Company's commitment to its employees is demonstrated through the following:

- Promoting a favorable culture and atmosphere in the workplace, together with fair and equal treatment to all employees.
- Providing welfare and security to all employees, with benefits including health insurance.
- Employee social activities and events are scheduled to serve as an employee morale booster. Popular activities include sports events, family events, or community service projects.
- Organizing mentoring workshops to facilitate knowledge transfer from experienced leaders to the Company's employees.
- Developing initiatives and programs targeted at training employees and improving their professional skills.

- Creating middle management development programs focused on providing a vehicle for middle managers to share best practices, discuss challenges, change management techniques, and manage mentoring experiences, performance measurement tools, and effective communication skills.
- Developing programs for fresh graduates to train them in various business functions such as: financial accounting, asset management, business ethics, marketing, and decision making.
- Ensuring that national work force in all relevant fields across the Company is compliant with the Kuwaitization law that sets ratios for national employment in the private sector.
- Developing and regularly reviewing succession plans.
- Spreading Zain Group's culture, professionalism and standards to its branches and affiliates across the region.
- Establishing compensation standards and protocols focused on rewarding superior performance from employees based on key performance indicators and talent management.
- Developing human resources policies that reflect the Company's commitment to its employees.

3.4.2 Whistleblowing Policy

The Company has an approved Whistleblowing Policy which is fundamental to the Company's professional integrity. It provides a method of properly addressing concerns that individuals within the firm might have, while also offering whistleblowers protection from abuse, harassment or penalizing actions (for more information, refer to ***Whistleblowing Policy***).

3.4.3 Work Ethics and Code of Conduct for Employees

The Company's Board has approved Work Ethics and Code of Conduct Policy for Employees. It is intended to provide guidance and assistance in recognizing and dealing with ethical issues and to help foster a culture of honesty and accountability. Each Employee is expected to comply with the letter and spirit of this Code.

The Employee must not only comply with applicable laws, rules and regulations but should also promote honest and ethical conduct of the business. They must abide by the policies and procedures that govern the conduct of the business (for more information, refer to ***Code of Conduct***).

3.5 Community

Zain Group's commitment to corporate social responsibility is evident in the numerous cultural, community and social activities and charities the Company supports. The Company's aims at diversifying its corporate social responsibility initiatives in multiple areas such as Social care*,* Professional development, Healthcare, Education, Environment and more.

The Company shall develop a periodic Corporate Social Responsibility Plan and prepare a periodic Social Responsibility Report representing the Company's key initiatives towards the community.

3.6 Vendors

The Company has internal policies for contracting and tendering process. The Company shall deal with all contractors and vendors in a transparent manner. Please refer to Supplier ***Code of Conduct***.

3.7 Counterparties

The Company conducts business affairs with its partners, competitors, suppliers, and other counterparties in accordance with the contracted trading terms and conditions in a fair and ethical manner. Our policy is to avoid any dishonest actions that may infringe upon the rights of the Company's counterparties as established by law or through mutual agreements.

The Company treats its counterparties equally and fairly through protecting its interests and ensuring they enjoy fair returns. The Company shall avoid a situation that might lead to conflicts of interest and will honor any binding commitment it makes.

4. Stakeholders’ Rights

The Company shall ensure that all stakeholders’ rights are well protected by guaranteeing the following:

- In accordance with the Human Rights Policy and Data Protection and Privacy Policy, the company is committed to protecting and promoting digital rights of the stakeholders. This includes the right to privacy, freedom of expression and access to information. These policies shape the methodology of our work and interaction in the digital sphere, ensuring that we respect and protect these fundamental rights for all stakeholders.
- All stakeholders shall be treated equally. The Company deals will ensure that the BOD, Related Parties and Stakeholders are treated equally without any discrimination.
- Stakeholders shall be granted access to information and data related to their activities in order to be able to obtain and refer to such information on a timely and regular basis.
- Stakeholders shall be guaranteed their rights that allows them to obtain compensation in the event of violation of their rights in accordance with the contractual terms and per laws and regulations. The company has adopted mechanisms to compensate stakeholders in case of violation of their rights in the approved procedures manual (for more information, refer to the ***manual***).

5. Confidentiality

Customers’ confidential information is well protected and can only be revealed if required by law or with proper counsel from the relevant party.

6. Stakeholders’ Obligations

As the Company ensures that Stakeholders’ rights are protected, it is expected that all stakeholders fulfill their obligation governed by their contracts and related laws and bylaws of regulatory authorities (such as CMA, CBK, MOCI, etc.).

7. Handling Complaints and Disputes

- Key stakeholders will report any complaints of services directly to CEO.
- The CEO will respond to the received complaint within 10 working days.
- All complaints received shall be recorded in a complaint register.
- Key stakeholders will report any irregularities or misconduct directly to the Board Secretary.
- The Board Secretary shall maintain a record of such cases which is to be distributed in BOD meetings.
- During the investigation of complaints, the Company shall ensure that key stakeholders rights are well protected.
- The BOD may assign Internal Auditors, Legal Advisors, and External Consultants to conduct such investigations. A report representing the results of the investigation conducted shall be submitted to the BOD directly.