



MOBILE TELECOMMUNICATIONS COMPANY (ZAIN)

ZAIN GROUP TAX PRINCIPLES & STRATEGY

Introduction

Zain Group operates within a clearly defined tax governance framework designed to ensure compliance, transparency, and alignment with business strategy, while supporting long-term shareholder value.

The Group's Tax Strategy is underpinned by its Tax Principles and supported by its Tax Code of Conduct. These principles are mandatory for all subsidiaries and legal entities, and Zain encourages joint ventures and associates to adopt consistent standards.

Tax governance is overseen by the Group Chief Financial Officer and the Audit Committee of the Board of Mobile Telecommunications Company K.S.C.P.

Tax Principles

We employ professionals who are responsible for our tax affairs in the countries where we operate. Our tax teams must follow a clearly defined set of principles and behaviors, which are governed by our Tax Strategy, and Code of Conduct.

These principles state that:

We will:

- Comply with both the spirit and letter of the law in all jurisdictions in which we operate.
- Adhere to international standards, including those developed by the OECD, particularly in relation to transfer pricing and global minimum taxation.
- Ensure full compliance with Pillar Two requirements, including Domestic Minimum Top-Up Tax (DMTT), Income Inclusion Rule (IIR), and Undertaxed Profits Rule (UTPR), where applicable.
- Maintain robust transfer pricing policies aligned with the arm's length principle and supported by appropriate documentation (Local File, Master File, and Country-by-Country Reporting).
- Act with integrity and transparency, maintaining open and cooperative relationships with tax authorities.
- Ensure tax outcomes are aligned with economic substance, with profits taxed where value is created.
- Implement strong tax governance and controls, including appropriate oversight, documentation, and review processes.
- Leverage technology and data systems to enhance accuracy, efficiency, and compliance in tax reporting.
- Manage tax risks proactively, ensuring they are identified, assessed, and aligned with the Group's risk appetite.
- Support responsible tax practices, consistent with the Group's ESG commitments and broader stakeholder expectations.
- Seek clarity and certainty in tax matters through advance rulings, agreements, or dialogue with tax authorities where appropriate.
- Protect shareholder value while ensuring compliance with applicable laws and

regulations.

We will not:

- Enter into artificial or aggressive tax arrangements lacking commercial substance.
- Shift profits artificially between jurisdictions to reduce tax liabilities.
- Use low-tax or secrecy jurisdictions “tax havens” without genuine commercial and economic activity.
- Establish structures that do not align with operational reality or business purpose.
- Engage in tax practices that could damage the Group’s reputation or stakeholder trust.
- Pay more tax than is properly due under a reasonable interpretation of the law and upon a lawful demand.

Tax Risk & Governance

- Zain maintains a low tolerance for tax risk related to compliance, reporting, and reputational exposure.
- Significant tax positions and strategies are reviewed at Group level and, where necessary, escalated to senior management or the Audit Committee.
- External advisors may be engaged where specialized expertise is required.

Transparency & Reporting

- Zain is committed to timely, accurate, and transparent tax reporting in accordance with applicable legal and regulatory requirements in all jurisdictions.
- The Group complies with applicable disclosure requirements, including Country-by-Country Reporting and financial statement disclosures under applicable accounting standards.