MOBILE TELECOMMUNICATIONS COMPANY (ZAIN)

ZAIN GROUP TAX PRINCIPLES & STRATEGY

Documentation Authorization Control Sheet

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Introduction

Zain Group operates within a clearly defined governance framework on tax that is designed to provide certainty for all stakeholders with an interest in our tax affairs. We have a Tax Strategy that is underpinned by our Tax Principles and supported by our Tax Code of Conduct. Zain Group Tax Policy & Principles are mandatory for all our operating subsidiaries and associated legal entities, and we encourage our joint ventures and associates to follow similar principles.

Our tax governance framework is overseen by the Group Chief Financial Officer as well as 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 the Group Tax Code of Conduct. These principles state that:

We will:

- Aim to comply with the spirits as well as the letter of the tax laws and regulations in the countries in which we operate.
- Aim to comply with relevant legal and regulatory obligations in line with our broader social responsibilities and our stakeholders' expectations.
- Act with integrity in all tax matters, disclosing relevant facts to tax authorities in the countries in which we operate under a policy of full transparency and based on open and honest relationships with those authorities.
- Undertake transfer pricing using the arm's length principle.
- Pursue clarity and predictability on all tax matters, wherever feasible.
- Seek to protect shareholder value in line with our broader fiduciary duties.
- Align tax payments with revenue generating activities and refrain from the use of offshore secrecy jurisdictions for the purpose of tax planning.

We will not:

- Seek to establish arrangements that are artificial in nature, are not linked to genuine business requirements and would not stand up to scrutiny by the relevant tax authorities.
- Artificially transfer profits from one jurisdiction to another to minimize tax payments.
- Transfer value created to low tax jurisdictions.
- Use tax structure without commercial substance.
- Use secrecy jurisdictions or so-called "tax havens" for tax avoidance.
- Pay more tax than is properly due under a reasonable interpretation of the law and upon a lawful demand.