



THE NEW PARADIGM SHIFT

SUSTAINABILITY REPORT 2024

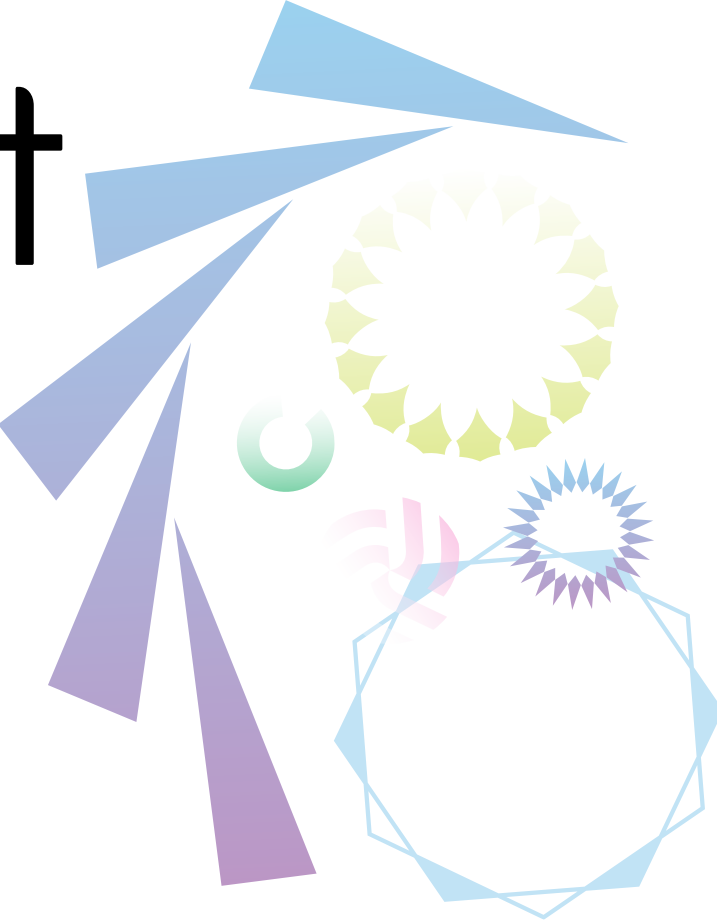


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About the Report





The Mobile Telecommunications Company K.S.C.P. (Zain)'s 14th Sustainability Report highlights the value that the company's activities, products, and services have on various aspects of business, society and the environment with the mission of providing meaningful connectivity and driving equitable systematic change to the communities it serves and beyond. This report provides a comprehensive overview of Zain's operations in creating, preserving or eroding value on a short-, medium- and long-term perspective through the implementation of its 2025 Corporate Sustainability strategy. The report is published annually and covers the period from 01/01/2024 to 31/12/2024.

Zain is headquartered in Kuwait and its countries of operation, which are referenced in the report, includes Kuwait, Bahrain, Iraq, Jordan, Saudi Arabia, Sudan, and South Sudan, as well as key subsidiaries of Zain: ZainTECH and Zain Omantel International (ZOI) which are headquartered in the UAE. In Morocco, Zain holds a 15.5% stake in INWI through a joint venture, with the operator not being referred to in this report.

This report corresponds with Zain's financial statements as outlined in the company's annual report. In addition, the report is reviewed, assessed, and authorized by the company's Vice-Chairman and Group CEO, Chief Sustainability Officer, Chief Financial Officer, and other members of the company's executive management prior to its publication.

Zain's 2024 Sustainability Report is independently verified by Ernst & Young (Al Aiban, Al Osaimi and Partners) under both Reasonable Assurance and Limited Assurance. Information on the Reasonable Assurance indicators can be found on [page 127](#) and the Limited Assurance report is showcased on [page 129](#).

The Sustainability Report is developed in alignment to various voluntary disclosures, such as the AA1000 Accountability Principles (AA1000AP) 2018; the Global Reporting Initiatives (GRI) standards; and the Sustainability Accounting Standards Board (SASB) with the application of the "Telecommunications Sustainability Accounting Standard", Task Force on Climate-Related Financial Disclosure (TCFD), United Nations Guiding Principles (UNGP) on Business and Human Rights Reporting Framework; ESG Reporting Guide published by Bursa Kuwait, GSMA ESG Metrics for Mobile; and the United Nations Global Compact (UNGC) principles. Zain's net-zero targets were officially verified and approved by Science-Based Targets Initiative (SBTi) in 2024. The methodology used to calculate Zain's emissions is based on the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard. This tool provides companies with the guidance and requirements to prepare their GHG emissions inventories. In addition, the company also aligns its emission factors to the International Energy Agency (IEA) Standards to ensure consistency across all country operations.

This edition of the report includes certain significant information from previous sustainability reports, reiterated for context. Redundant or readily available information has been excluded to enhance the fluidity of the current report. Additionally, the report addresses instances where organizational changes have occurred during the reporting period.

This report is published on March 27, 2025.

Zain welcomes any comments, feedback, or suggestions regarding the content included in relation to Zain's sustainability performance.

Please reach out to us on:

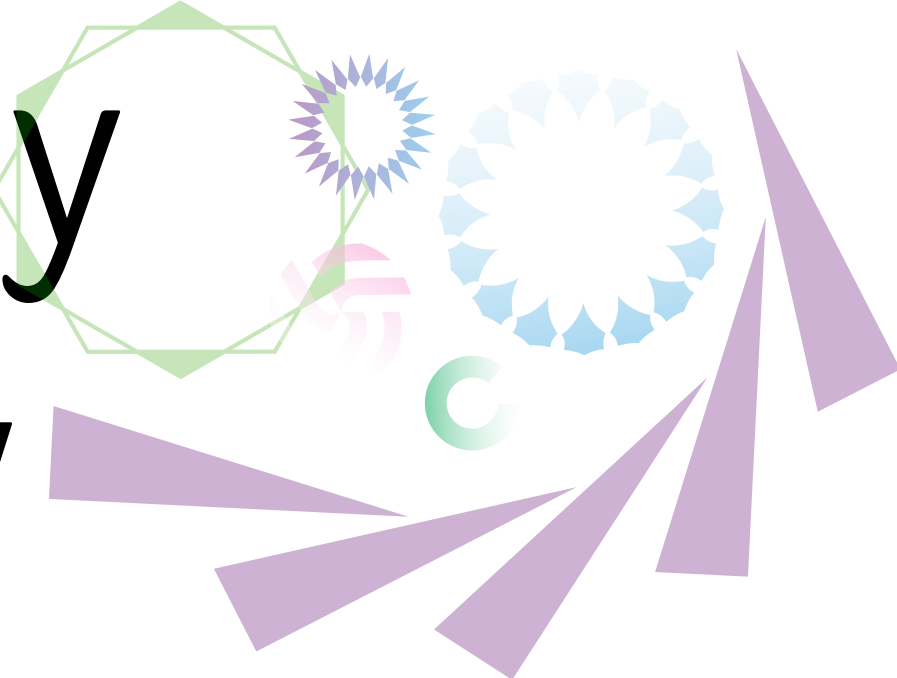


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Company Overview





Established by an Amiri decree in 1983, Zain, originally known as Mobile Telecommunications Company K.S.C.P., is headquartered in Kuwait. A leading provider of ICT innovative technologies and digital lifestyle communications operating in eight markets across the Middle East and Africa.

Zain's major shareholders:



The table below shows a detailed breakdown of the equity share of Zain across its operating markets in the MENA region:

100%	Zain International B.V. ("ZIBV")
96.516%	Pella Investment Company ("Pella")
65.11%	Zain Bahrain B.S.C ("MTCB")
100%	Sudanese Mobile Telephone (Zain) Company Limited ("Zain Sudan")
100%	South Sudanese Mobile Telephone Company Limited ("Zain South Sudan")
76%	Al Khatem Telecoms Company ("Al Khatem")
76%	Atheer Telecom Iraq Limited ("Atheer")
37.045%	Mobile Telecommunications Company Saudi Arabia ("SMTC")
100%	ZainTech Solutions FZ-LLC ("Zain Tech")
100%	Zain Fintech Holding W.L.L ("Zain Fintech")
100%	Zain Ventures Holding Company W.L.L ("Zain Venture")
100%	IHS Netherlands GCC B.V. ("IHS")

Zain served 49M customers with voice and data related products and services in 2024. Details on the number of prepaid and postpaid customers can be found in the 'Customer Base' section of this report on [page 69](#). Additionally, ZainTECH, the company's UAE-headquartered integrated digital solutions arm, offers an inclusive range of ICT enterprise (B2B) services to business and governments throughout the region.

Zain Omantel International (ZOI), the Middle East's premier international wholesale powerhouse, is transforming the international telecommunications wholesale sector and emerging as the leading wholesale provider for regional operators, international carriers, and global hyperscalers.

As an active member of the GSM Association (GSMA), Zain continues to commit to various industry trends and material topics related to regulatory affairs, sustainability, climate change, circularity, biodiversity, and children's rights.

Pella owns 100% of Jordan Mobile Telecommunications Services Co. JSC – "JMTS" and 99.1% of Al Mouakhaa Lil Kadamat AL-Logistya Wal AL-Itisalat ("Mada Jordan"). Al Khatem owns 100% of Atheer. Zain Tech owns 100% of BIOS and 65% of Adfolks.

JMTS, MTCB, Zain Sudan, Zain South Sudan, Atheer and SMTC operate the cellular mobile telecommunications network in Jordan, Bahrain, Sudan, South Sudan, Iraq and the Kingdom of Saudi Arabia (KSA) respectively. Mada Jordan provides WiMAX services in Jordan. Zain Tech provides network consultancy and cloud solutions in MENA region. Zain Venture is engaged in activities of holding companies. Zain Fintech is engaged in activities of holding companies. IHS provides tower infrastructure services.

49M



Active customers

USD 6.4B

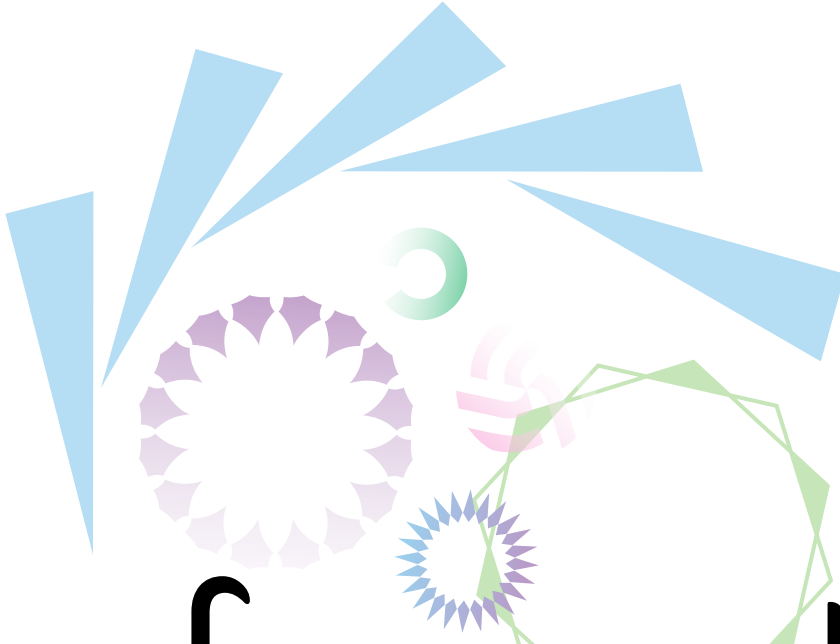


In consolidated revenues

USD 677M



In net income



Message from the Board of Directors

In a complex and challenging world, Zain’s Board of Directors continues to provide its unwavering support to employees, shareholders, business partners, various communities, and all related stakeholders. This outlook seeks to ensure Zain continues to evolve and flourish as it looks to provide quantifiable value for the organization, society, and the environment.

The Board of Directors recognizes the enabling factor resulting from the company’s business activities, impacting a multitude of areas with significant effects on socio-economic development.

Climate change and its negative consequences continue to be of material importance to the Board who pays close attention to monitoring climate change risks and opportunities, climate action governance, and charting Zain’s strategic pathway to accelerate the decarbonization of the business.

The Board continues to have a strong oversight into the Zain Sustainability strategy to ensure the organization creates positive sustainable value for all, including vulnerable groups, the elderly, and children.

It is recognized that the Board’s commitment is essential towards the fulfillment of the company’s aspirations and a promise of a wonderful world for all its stakeholders.

We extend our gratitude and appreciation to the Amir of the State of Kuwait, Sheikh Meshal Al Ahmed Al Jaber Al Sabah, and to the members of Government in the markets in which we operate, for their instrumental support necessary for the continuous development.

Sincerely,
Zain Group Board of Directors



**Mr. Osamah Othman
AlFuraih**
Chairman of the Board
of Directors



**Mr. Bader Nasser
Al Kharafi**
Vice Chairman and Group
CEO



**Mr. Talal Said
Al Mamari**
Member of the Board
of Directors



**Mr. Abdulrahman
Mohammed
Ibrahim Al Asfour**
Independent
Board Member



**Mr. Yousef Khaled
Al Abdulrazzaq**
Member of the Board
of Directors



**Mr. Zaki Hilal Saud
Al-Busaidi**
Member of the Board
of Directors



**Mr. Atif Said Rashid
Al Siyabi**
Member of the Board
of Directors



**Mr. Aladdin
Baitfadhil**
Member of the Board
of Directors



**Mr. Nasser Suleiman
Al Harthy**
Member of the Board of
Directors



**Dr. Saad Ahmed
Alnahedh**
Independent
Board Member



Message from the Vice Chairman and Group CEO



In a year in which geo-political conflict impacted Zain's operating context, the company continued to demonstrate its inherent ability to provide value throughout its markets of operation.

Zain's adaptive approach to the business, focused on the opportunities and the evolving operational landscape, provided the organization with strategic prospects to support the achievement of sustained financial growth.

Central to the company's progress and success is our exemplary human capital whose belief, dedication, and heart generate the energy to forge ahead in the face of challenges. The obstacles that were overcome included mass displacements, extreme weather events, market competition, a rise in cybersecurity risks, currency devaluation, and inflation, to name only a few.

Our commitment to helping create "A Wonderful World" resulted in outstanding financial performances across key markets. We faced headwinds in Sudan due to the ongoing civil conflict, but we experienced growth there due to the company's strategic positioning. We continued to achieve positive results from the implementation of our 4WARD profitable expansion strategy, resulting in solid growth across multiple new business streams, notably in fintech, digital and enterprise revenues.

Zain's fintech arm provided sustained value, characterized by the extraordinary growth of Tamam in Saudi Arabia and Zain Cash in Iraq and Jordan, demonstrating the socio-economic impact these services have on our communities.

Flexible solutions offered through our innovative digital operators Yaqoot in KSA and oodi in Iraq, and through our marketing partnership with Red Bull in Kuwait, powered through a sustainable and dynamic mobile app, offer customers the convenience of signing up for appealing voice and data connectivity services from the comfort of their home, fulfilling our promise to provide the best and most unique digital lifestyle experiences.

Similarly, our groupwide API platform, Dizlee represents a powerful Digital Monetization Ecosystem offering a unique sustainable proposition to developers, entrepreneurs, global and local brands, internet players and businesses to connect in a "one stop shop" model. Strategic international partners planning to enter the Middle East to offer their digital services, can connect to Zain's and Omantel's 50 million customers in just one simple and efficient connection with no need for multiple integrations.

ZainTECH, our regional integrated digital solutions provider, continues to offer a unique value proposition through the delivery of comprehensive digital solutions for businesses and governments across the region. ZainTECH is committed to driving sustainability through its innovative digital solutions that empower businesses to meet their sustainability ESG objectives by reducing carbon footprint, resource optimization, and sustainable supply chain as well as enabling them to monitor and improve their sustainability metrics.

Zain Omantel International (ZOI), our premier wholesale provider in MENA, continues to achieve the highest network ranking in the region and is included in the world's top 100 ranking. ZOI enables our operating entities to manage their businesses in full independence, while providing a critical foundation for sound connectivity in advancing digital transformation initiatives. ZOI's strategic objective is to manage and invest in regional and international subsea and terrestrial networks connecting our operating and international markets.

Our commitment to systemic change continues to evolve, especially at challenging times. We are committed to providing support to all our employees across our markets through our BE Well program and many other employee development initiatives under our Inclusion, Diversity and Equity program across the organization.

2024 also saw Zain's net-zero targets formally verified and validated by SBTi (Science Based Targets Initiative). Zain is committed to reducing its emissions by 2030 by 42%, and achieving net-zero by 2050 in line with the Paris Agreement and the IPCC Assessment Report No.6. The target validation alongside our disclosures to CDP, are a firm commitment to addressing climate change in a responsible and equitable manner, recognizing the impact we have across our value chain.

Through our business activities and our various initiatives, we hope to inspire future generations and create pathways for transformation and growth.

We would like to offer our appreciation to His highness the Amir of the State of Kuwait, Sheikh Meshal Al Ahmed Al Jaber Al Sabah, and the members of the Governments in which we operate for their invaluable support, which is instrumental in our growth and development.

Sincerely,
Bader N. Al Kharafi



Message from the Chief Sustainability Officer



Zain’s strong adherence to its social contract has paved the way for the company to push boundaries with the conviction that through our strategic direction, business decisions and holistic approach to providing meaningful connectivity grounded in transgenerational impact, is the only way by which the organization is able to leap forward and stay true to the promise of a wonderful world.

Zain’s operational base in the MENA region shapes its operating context, with a myriad of socio-economic and environmental challenges, which are being tackled through the company’s agility, resilience, and focus on innovation, creating value for all.

The company’s determination in 2024 gave rise to a year of growth through the uptake of strategic initiatives across its markets. Focused investments in the company’s human capital resulted in programs such as “Unity,” which brought together the organization and emphasized a human-centric approach. The delivery of both the 4WARD and Sustainability strategies continued to evolve, resulting in a solid positioning for Zain.

During 2024, greater emphasis was placed on how Zain creates and maintains or erodes value across its business units to ensure that organizational purpose is ingrained into the company’s decision-making processes. Our various operations had a greater focus on their sustainability initiatives, to achieve the related sustainability KPIs and demonstrate the value being created for communities.

The exemplary determination of Zain in a year riddled with regional conflict leading to mass displacement, and extreme weather challenges, allowed Zain to fulfill its strategic objectives and focus on the sustainability risks and opportunities. All our operations carried out initiatives added to our mission to provide meaningful connectivity to address the digital and gender divides, safeguard children’s rights, and conserve and preserve nature and biodiversity.

In 2025, we will evaluate the impact of our endeavors on systemic change and net positive outcomes to refine strategic objectives and continue reaffirming our alignment to the United Nations’ Sustainable Development Goals.

Sincerely,
Jennifer Suleiman





2024 Highlights



Products and Services



Zain Group signed a landmark agreement with TASC and Ooredoo Group for the merging of 30,000 towers, a pivotal step towards creating the largest TowerCo in the region.



Launched in Q1 2024, Zain Group’s Responsible Marketing and Communications Standard reflects its commitment to ethical and transparent practices, ensuring inclusivity, diversity, and the protection of vulnerable populations. The Standard was developed using UNICEF’s MO-CRIA assessment tool, it evaluates commercial practices across operating companies concerning children’s rights.



Zain Jordan launched the 114 emergency application, featuring a video platform that enables the deaf community to report emergencies across any mobile network. This initiative enhances the existing 114 emergency line project, focusing on improving accessibility to communication and information technology for persons with disabilities.

People & Purpose



In 2024, Zain became the first long-term volunteering partner in the Middle East for Be My Eyes, a global app connecting blind or low-vision individuals with sighted volunteers for real-time visual support. This partnership empowers users with greater independence in daily tasks like reading labels and navigating environments.



Zain trained 1,750 employees in 2024 as part of its upskilling initiatives, aligned with the digital transformation strategy to foster innovation and sustainability across the organization.



Zain expanded its BE WELL program to include unlimited counseling and therapy sessions sessions to all Zain employees offered by Kuwait Counseling at no charge.

Sustainability Agenda



Zain launched the #EveryChildHasRights campaign to raise awareness about the critical threats faced by children in conflict-affected regions, achieving over 16.5 million impressions across Zain’s social media footprint.



As part of Zain’s supplier screening program, 604 suppliers completed the self-assessment questionnaire, 59 suppliers were physically audited, and 2,213 of active suppliers aligned to Zain’s policies and 185 suppliers underwent Zain’s supplier training.



ZOI ensures its partners to conduct comprehensive environmental impact assessments in accordance with both regulatory and international standards, identifying sensitive marine and nearshore habitats, mitigating risks to biodiversity, and minimizing ecological impacts.



Kuwait		Bahrain		Iraq		Jordan		Saudi Arabia	
Annual Revenue (USD m)	1,217	Annual Revenue (USD m)	205	Annual Revenue (USD m)	1,080	Annual Revenue (USD m)	556	Annual Revenue (USD m)	2,763
Customers (m)	2.6	Full-Time Employees	230	Customers (m)	19.7	Customers (m)	4.2	Customers (m)	9.2
Full-Time Employees	1,602	Total Capex (USD m)	33	Full-Time Employees	1,293	Full-Time Employees	1,329	Full-Time Employees	1,744
Total Capex (USD m)	126			Total Capex (USD m)	243	Total Capex (USD m)	90	Total Capex (USD m)	396

- In September 2024, Zain launched the Green Rewards trade-in service, enabling customers to exchange old devices for rewards. To date, 17 devices have been traded in.
 - Zain Kuwait conducted its first-ever data privacy awareness session tailored for cleaning and maintenance staff, reflecting the company’s commitment to inclusivity. The training engaged over 70 participants, including humble expatriates, equipping them with essential knowledge to safeguard personal and professional data.
 - Last year, Zain Kuwait launched Kaspersky Safe Kids, a comprehensive parental control app designed to protect children online. Since its launch, the app has achieved an average of 16 activations per day and maintains a total of 501 active subscriptions.
- Zain Bahrain launched a two-week recycling competition to reduce single-use plastic usage, collecting 308 kilograms of plastic in partnership with The Global Community Shapers – Budaiya Hub.
 - A session on cyber security was conducted for 15 elderly members of the Al Hekma Retired Society in Bahrain, focusing on protecting banking information, verifying online contacts, avoiding scams, and identifying potential fraud.
 - Zain Bahrain signed a Memorandum of Understanding with the Bahrain Helpline Office, under the Ministry of Social Affairs, to outline the company's strategic initiatives to create shared value for both organizations.
 - In line with Bahrain’s 2060 carbon neutrality goal, Zain partnered with the Ministry of Municipalities Affairs and Agriculture and NIAD to plant 2,000 mangrove saplings in Western Aker.
- In 2024, Zain Iraq’s MaharaTech competition helped 30 students from five universities build technical skills and develop tech solutions for education challenges. Over three months, participants gained expertise in data automation, digital communication, and marketing research while fostering entrepreneurship and career growth.
 - In 2024, 160 women joined Zain Iraq’s Women in Tech program, undergoing three months of mentoring on 40 technical topics and soft skills, leading to the hiring of over 40 women since the program's inception. The program also included a career fair with Zain subsidiaries and leading tech companies, resulting in 10 women securing jobs.
 - Zain Iraq hosted a five-day stationery bazaar at its HQ, where Zainers purchased bags and stationery packages for orphaned children, who received their items at the HQ. In collaboration with Al Tawaen Charity, this initiative, along with a similar campaign in Basra, supported 250 children in continuing their education.
- Zain Jordan, in collaboration with UNICEF, has been advancing the B12 learning platform since Feb 2021, benefiting 24,000 students by enhancing access to quality education.
 - Zain Jordan donated 90 Negative Pressure Wound Therapy (NPWT) devices, an advanced wound care technology that uses controlled suction to promote healing, in collaboration with the Royal Medical Services, supporting Jordanian field hospitals operating in Gaza.
 - Zain Jordan, in collaboration with the United Nations Population Fund, conducted the 8-week Me and My Mobile Program for refugee women. The training included sessions on setting up email accounts, exploring educational and employment opportunities, social media skills, and Instagram marketing, reaching 27 women and enhancing their confidence in benefiting from being online.
- Since 2022, Zain KSA has partnered with Aanaab and Code School Finland, training 700 teachers and benefiting over 28,000 youth through a program that enhances digital education and coding skills.
 - During Purple Saturday, Zain KSA collaborated with the Authority of People with Disability (APD) on a social media campaign to promote a lifetime 50% discount on selected postpaid voice bundles. This initiative resulted in an impressive 600% increase in subscriptions.
 - Zain KSA signed an MoU with Ertiqra to support e-waste recycling, resulting in over 3,000 devices being recycled.



Sudan

South Sudan

ZainTECH

Zain Omantel International

Annual Revenue (USD m)	260	Full-Time Employees	160	Full-Time Employees	646
Customers (m)	10.1				
Full-Time Employees	766				
Total Capex (USD m)	137				

- Zain Sudan’s vocational training program addresses youth unemployment by equipping 1,256 participants in Egypt and Sudan with technical skills aligned with market needs. Delivered in-person with external partners, it enhances employability through practical, hands-on training.
- Zain Sudan launched the Women in Technology program in December, adapting to the current situation with an online format. Running until January 2025, the program aims to empower women with advanced skills in programming, AI, and innovation through a hybrid model of 12 live sessions which were also recorded and shared.
- Zain Sudan launched an environmental sanitation campaign in shelters for internally displaced persons (IDPs) in Al-Dueim, White Nile State, under the slogan “Prevention - Health - Safety.” The initiative aimed to improve environmental conditions and sanitation in 20 IDP centers and raise awareness among 3,000 beneficiaries.

- Zain South Sudan supported 20 young women in ICT training, empowering them with skills and knowledge to advance in the field of information and communication technology.

- With the latest partnership with UL Solutions, ZainTECH is now one of only three GCC-certified providers for their SPIRE building assessments. This certification strengthens ZainTECH’s ability to deliver advanced solutions, ensuring enhanced security, privacy, and operational resilience for regional businesses.
- The sustainability theme for GITEX highlighted our approach to enabling organizations throughout the region to adopt technology to drive better sustainability outcomes.
- With the latest upgrades, ZainTECH’s sustainability platform combines 3D visualization, Internet-of-Things integration, and AI-driven insights to optimize energy efficiency, monitor air quality, and predict consumption trends, empowering organizations to achieve sustainability goals, enhance operations, and promote occupant well-being with actionable, real-time data.

- ZOI joined One Consortium, a not-for-profit organization working to tackle illegal and unwanted international voice calls and messages. ‘One Consortium’ brings together major telecom companies like, Lumen, Orange Wholesale, Verizon and Vodafone as well as global industry organizations such as i3Forum, the GSMA, Global Leaders Forum (GLF) and Global Solutions Council (GSC) to address fraud in international telecommunications and its impact on consumers and businesses worldwide.
- ZOI ensures its partners to conduct comprehensive environmental impact assessments in accordance with both regulatory and international standards, identifying sensitive marine and nearshore habitats, mitigating risks to biodiversity, and minimizing ecological impacts.



Awards



Zain Group



Zain named “Best Workplaces for Women” in Fast Company Middle East’s inaugural list



Zain presented with two distinguished awards in Sustainability and Gender Diversity



Zain awarded ‘Best Corporate Governance in Kuwait’ accolade from World Finance for milestone fourth consecutive year



Zain’s innovative efforts in data architecture recognized at Cloudera’s annual Data Impact Awards



Zain named ‘Best Telecom’ and ‘Best Corporate Governance’ company in Kuwait by International Finance Magazine



Zain claims the biggest share at 11th Kuwait Creativity Award by winning five trophies in recognition of its captivating TVCs and engaging community programs



Awarded in 2024, Zain maintains lead in Service Hero’s Customer Satisfaction Index Awards ranking first in ‘Best Mobile Operator’ and ‘Best ISP’ categories for 2023



UAE Embassy Recognizes Zain for role in enhancing local business landscape



AUM recognizes Zain’s strategic role in supporting education



Zain Alshuhoor recognized as Distinguished Social Project in Kuwait’s private sector



Zain’s Inclusion, Diversity & Equity University recognized as ‘Best People Development’ program at MERIT Summit Awards



Zain Group and ZainTECH scoop three awards at Fast Company Middle East Innovation Awards 2024



Zain wins ‘Best 5G Business Development Strategy’ award Presented by GSMA during 5G Core Summit held in Dubai



Zain named Digital Transformation Enabler of The Year By The Energy Year recognizing the company’s role in empowering the local energy sector



Zain wins ‘Outstanding Mobile Broadband Network Quality’ award in SAMENA Council’s LEAD Awards recognizing its leadership in delivering exceptional 5G experiences



Zain Kuwait, along with its subsidiary Mada Communications, have been recognized with the ‘Best Industry Digitalization’ award for the Energy Sector



Zain dominates 12th edition of Kuwait Creativity Award with five accolades



Zain Bahrain



Zain Bahrain Honored with “Employer of the Year Award in the Private Sector” at 12th Annual GCC GOV HR and Youth Summit and Awards



Zain Bahrain Honored with Sustainability in HR Award at the HRM Summit Awards 2024

Zain Jordan



Zain Jordan has obtained the ISO22301 for Business Continuity Management



Zain Jordan awarded for Best FTTH Service Innovation in Emerging Markets in SEMNA’s Lead Awards.



His Majesty King Abdullah II bestows the Silver Jubilee Medal on Zain Jordan

Zain Saudi Arabia



Zain KSA and Huawei’s FWA2 project won the 2024 GTI Market Development Award at MWC Barcelona 2024.



Zain KSA Wins Ghazi Al Gosaibi Award for the Best Work Environment for Women



Zain KSA has attained the CSR Award by Saudi Arabia’s Ministry of Human Resources and Social Development



Zain KSA Earns New International Recognition for "Excellence in Diversity and Inclusion" and "Excellence in Social Responsibility



A Benchmark for 5G Advanced and Digitalization Leadership, Zain KSA Secures Two Awards at Telecom Review Leaders’ Summit 2024

ZainTECH



ZainTECH Awarded Microsoft Azure Expert Managed Service Provider (MSP) Status



ZainTECH scores two wins at Fast Company Middle East Innovation Awards 2024

ZOI



Zain Omantel International (ZOI) Shines at Carrier Community Awards 2024, Winning “Best Subsea Cable Operator” and “Best Young Professional”



Corporate Strategy



From 4SIGHT to 4WARD: Accelerating the company's evolution to TechCo

Zain is firmly committed to driving profitable, sustainable growth while creating value for all stakeholders. To achieve this, the Board and executive management implement forward-looking strategies to accelerate the evolution of digital ecosystems across its operations.

2019:

Zain launched its 4SIGHT corporate strategy in 2019, successfully achieving its goal over the past five years of transforming the company into a diverse digital services provider for consumers, governments, and businesses. The 4SIGHT strategy was built on two key strategic directions—Evolution of Telco and Growth Verticals—each supported by four fundamental pillars.

2025:

In December 2024, the company's leadership introduced the new '4WARD' corporate strategy, aimed at fast-tracking its transformation into a purpose-driven TechCo conglomerate.

Evolution of Telco

1. Digital Transformation

Zain has devised a comprehensive digital transformation framework that places customers at the center of everything we do. This framework focuses on developing relevant products that meet customer needs, investing in technology to support these innovations, and ensuring we have the right people in place to deliver on this vision.

Data plays a crucial role, allowing us to gain deeper insights into our customers and make informed decisions that enhance their experience. Additionally, we have implemented a communication strategy to effectively convey our promise to customers, ensuring alignment and engagement across all touchpoints.

Through this framework, we aim to exceed customer expectations, creating a dynamic digital ecosystem that supports our vision of growth and leadership in the digital space.

In 2024, Zain Group continued to drive digital transformation across its operations, further strengthening its commitment to innovation and technology leadership. The Group is committed to continuously enhance its digital capabilities, embracing modern technologies, and optimized processes to deliver enhanced value, supporting its vision for a fully integrated digital ecosystem that meets the evolving needs of all stakeholders. Zain believes that data is the ultimate enabler for AI, and is therefore focused on embracing a data-driven approach. This involves recognizing data as a key asset, adopting data management best practices to maximize its value, and fostering a culture of data literacy and analytical capability throughout our operations.

2. Enterprise and Government

Zain is dedicated to collaborating with organizations and governments to deliver essential connectivity and cutting-edge solutions that fuel business growth. Through close collaboration with ZainTECH, Zain's digital solutions provider, our B2B teams design and implement tailored, state-of-the-art solutions for both public and private sectors. This collaboration drives market development and enables cross-selling of advanced ICT services, setting Zain apart in the regional enterprise market. Additionally, Zain empowers smaller businesses by providing access to resources and services they need to thrive.

3. Fixed Connectivity

Zain is dedicated to driving digital transformation across societies by providing high-quality, secure broadband connectivity, serving as a catalyst for enhanced information access, education, healthcare, smart cities, and overall economic growth. Through its extensive fiber and 4G/5G networks, Zain ensures reliable fixed connectivity for both residential and business customers, including those in underserved areas, thereby bridging the digital divide. This approach fosters significant socio-economic benefits, such as improved educational, healthcare and smart city outcomes, greater digital inclusion, and expanded economic opportunities. By leveraging advanced technologies like 5G, 4G, and (FTTH), Zain continues to empower communities and drive sustainable development across its markets.

4. Portfolio Optimization

Zain Group continued its disciplined mergers and acquisition (M&A) approach and successfully concluded the acquisition of STS Arabia in 2024. This strategic move enables ZainTECH to expand its service offerings to enterprises and governmental bodies, access top talent, foster innovation, and enhance its competitive position across the region.

Additionally, the Group entered a landmark agreement with TASC and Ooredoo Group for the merging of up to 30,000 towers in Qatar, Kuwait, Jordan, Iraq, Algeria, and Tunisia, a pivotal step towards creating the largest towerco in the region. The operating model will provide passive infrastructure as a service, supporting the reduction of MENA's carbon footprint. This new joint venture advances Zain's vision of a MENA-wide towerco, focused on evolving into a smart telco and creating a value-focused portfolio by generating significant value and capital efficiencies that will empower the MENA's digital future.





Growth Verticals

1. ICT

ZainTECH, the digital solutions provider of Zain Group, offers comprehensive AI-powered services to accelerate growth for enterprises through monetization of data and digital assets in a sustainable manner. A competitive advantage for ZainTECH is the depth and breadth of its operations and solutions, which now span eight markets in the Middle East and Africa, and cover the entire ICT stack including cloud, cybersecurity, big data, IoT, AI, smart cities, modern infrastructure, drones and robotics, enterprise licensing, and emerging technologies, all under one roof.

In March 2024, ZainTECH announced during its participation at LEAP, the opening of its offices in Riyadh, strengthening its presence in Saudi Arabia. This expansion supports the Kingdom's Vision 2030 and highlights Zain Group's commitment to investing in technology and local talent.

In October 2024, ZainTECH showcased its AI-driven enterprise and sustainability solutions at GITEX Global, emphasizing how enterprises can achieve efficient and impactful returns from technology investment. During the event, ZainTECH entered into a series of significant technology agreements with leading regional and global entities, reflecting the company's commitment to enhancing its sustainability-focused service offerings and driving innovation. The booth, designed with recycled materials, underscored the company's focus on sustainable practices and attracted significant interest.

2. Digital Infrastructure

Zain's partnership with TASC has newfound success with the inking of the latest TASC deal with Ooredoo Group, for up to 30,000 towers, which is set to close once regulatory approvals are received. The new towerco JV will be the largest in the region.

The JV will act as a platform where additional operators will be able to join, allowing the partners to unlock significant savings through realizing region-wide economies of scale, and consolidation of overlapping portfolios as well as investment in modern passive network infrastructure.

TASC activities have already had an impact on operations, both from an efficiency standpoint, as well as from a sustainability perspective. Building on its proof of concept activities from 2023, which yielded significant positive results, TASC has invested in a Power Train system upgrade, deploying more efficient and climate-friendly power generation solutions, including sustainable energy solutions such as solar. TASC also invested in upgrading the existing lead acid batteries into more efficient Lithium-Ion (LI) batteries as well as adopting an LI hybrid solution that is projected to drive significant diesel consumption reduction and reduce CO₂ emissions throughout the TASC network.

TASC has also marked success in acquiring new customers and providing collocation services to other operators, which leads to network densification and reduced carbon emissions.

In the coming few years, TASC will continue to invest a significant amount on network modernization initiatives, like the ones mentioned above.

3. Zain Fintech

In 2024, Zain scaled its fintech activities by expanding its suite of digital financial services, contributing to the evolution of the region's digital ecosystem. Leveraging the innovative products and services developed by FOO, a fintech solutions subsidiary of Zain Group, the telco continues to foster innovations within the fintech space. This is achieved through Tamam in Saudi Arabia, Zain Cash in Iraq and Jordan, Bede in Bahrain, and with the expected rollout of Bede in Kuwait and Sudan in 2025. Financial inclusion is at the core of Zain's fintech activities, where we intend to offer financial services to everyone, particularly the large unbanked and underbanked population in our region.

In Saudi Arabia, as a fast growing micro-lending platform, Tamam offers an end-to-end digital platform disbursing Murabaha financing within minutes. It expanded its offering to services such as digital installments with large and independent retailers, embedded finance through retail partnerships (Samsung), and targeted large employers with secured and easy HR-free approval loans.

In Iraq, Zain Cash continues to be the market leader, providing a variety of financial services to the population where it is estimated that 81% of the population are unbanked. The launch of international remittances in collaboration with Western Union was a major success, and security onboarding and transactional measures were increased using 3D Liveness Check technology for facial verification. We have also launched a pilot for virtual credit cards, allowing people to shop online without the need for a bank account.

In Jordan, Zain Cash is the market leader, controlling over 40% of digital payments in the market. The new app elevated customer experience, introducing new features such as cashbacks and other digital services. The credit card business has also expanded, filling a large gap present in the market. We are currently focused on unlocking new possibilities for corporate and small, medium enterprises (SMEs).

In Bahrain, Bede successfully launched with a focus on micro lending. Only a few months old, the team is focused on enhancing the customer experience, gradually building the loan book, and introducing new services in line with the Central Bank of Bahrain regulations.

In Kuwait, Bookeey offers basic payment services. The platform is going through a major digital transformation and we expect to relaunch the business under the new brand name Bede in Q1'25.

In Sudan, following the restoration of the network, the fintech offering is being revised along with a new technical partner and platform architecture. New go-to-market plans and strategy have been prepared for the launch of Bede Sudan in H1'25, subject to the ongoing conflict in the country.





Growth Verticals

4. Digital Services

The company’s focus on building innovative digital services to create opportunities that bridge the digital divide, ensure business continuity, and advance socioeconomic development saw substantial progress during 2024.

Zain Ventures

Zain Ventures spearheads Zain’s investment portfolio, with the aim of diversifying the company’s activities and leveraging future investment opportunities. Zain expanded its relationship with regional and international venture capital funds and continued to diversify its portfolio through direct investments, offering the investors access to Zain’s wide geographical reach and expansive customer base.

In 2024, Zain Ventures invested in:

- **Kadmos Capital:** A London-based investment firm dedicated to discovering deeptech companies and impactful technologies in Europe
- **Articul8:** Offers enterprise customers a full-stack, vertically optimized and secure generative artificial intelligence software platform. The platform delivers AI capabilities that keep customer data, training, and inference within the enterprise security perimeter
- **Intelmatix:** A Saudi-based AI software startup focusing on Decision Intelligence, building the region’s first accessible decision-focused platform available as SaaS for SMEs and enterprises
- **xAI:** An AI company founded by Elon Musk in March 2023 with a mission to “understand the true nature of the universe”. The company collaborates closely with Musk’s other ventures, in what is referred to as the Muskonomy. In November 2023, xAI introduced Grok, a conversational chatbot integrated with the X platform



Dizlee: A Single Digital Hub

Dizlee, the digital services hub of Zain, is at the forefront of innovation and centralization in the telecommunications industry. With its wide-reaching impact across Zain's operating companies and groundbreaking initiatives, Dizlee has transformed how digital services are delivered, creating a streamlined, unified core for all Zain operations across the region, including Omantel, paving the way for a future centered around digital efficiency, accessibility, and tailored solutions for businesses of all sizes. As a dynamic API Platform and digital monetization ecosystem, DIZLEE offers innovative entertainment and gaming solutions, direct operator billing, messaging, digital authentication.

By exposing its APIs through the Dizlee platform, Zain removes a significant barrier to the development of profitable digital partnerships from across the globe, enhancing the time-to-market rollout of appealing entertainment and gaming services to our customers. The API platform allows Zain customers to connect with various services such as entertainment, education, social networking, and health.

The centralization allows for the seamless management of over 213 live services from 44 partners, ranging from digital advertising to an expanding API marketplace. Since launch in mid-2018, over 240 million transactions have been processed over the platform, generating US\$372 million in gross revenue, highlighting its role as a crucial pillar in Zain's digital strategy.

In Q2 2024, Dizlee launched the region's first API marketplace, establishing a pioneering hub for digital transformation across various industries. Focused initially on Communication Platform as a Service (CPaaS) solutions, the marketplace provides tailored services for sectors like delivery, fintech, and insurance, including features such as number masking, call recording, and location sharing. Distinct in its

adaptability and customer-centric approach, Dizlee’s API marketplace allows enterprises to seamlessly integrate digital services that align with evolving business needs. Beyond industry-focused solutions, Dizlee is committed to inclusivity, offering accessibility features like indoor navigation for visually impaired users. This marketplace is a growing ecosystem of partnerships that drive innovation and value across the region, positioning Dizlee as a leading force for collaboration and digital progress.

In 2024, the following services were added to Dizlee:

- **Pikaboo:** Our all-in-one new exciting children’s entertainment experience for families
- **AI Avatar:** Allows the user to change their visual identity thanks to the apps’ AI avatar generator
- **Diva:** A digital interactive virtual assistant on chat supported by a healthcare specialist, which offers guides on fitness and wellness.

More details of Dizlee’s services can be found in ‘Products and Services’ section on [page 68](#).

zain ESPORTS

Zain esports

Throughout the year, Zain esports maintained its focus on the youth segment, actively exploring new opportunities for various broadband services. Hosting numerous tournaments and engagement activities, Zain esports showcased its commitment to the gaming community and provided a platform to nurture e-gaming talent regionally. This included the selection of Arabic-speaking commentators and promotion of local esports teams, aiming to propel their profile globally.

- Zain esports partnered with Riot Games to conduct a MENA League of Legends Server launch event, conducted at 15 venues across eight countries in the ME region over two days. Zain esports participated in five of them in Kuwait, Saudi Arabia, Bahrain, Jordan, and Iraq. The event reached over 2 million gaming and esports enthusiasts through Zain esports social media channels of League of Legends Arabia, and over 20 influencers who participated in the events
- Zain esports activations restarted for 2024 with an inaugural FC24 (previously known as FIFA) activation in Kuwait
- Zain esports acquired Kuwait based Duwaween Games to launch a series of tournaments across its operating companies, with a focus on popular regional card games

41

Tournaments concluded

67.9K

Number of participants

70.3M

Social media impressions

207.1K

Follower count across social media platforms

818.3K

Viewership across the channels



4WARD - Progress with Purpose



4WARD is Zain’s new five-year sustainable corporate strategy that focuses on continuity, acceleration, collaboration and digital innovation, and is designed to foster value creation by fast-tracking the company’s evolution from a predominantly mobile centric operator into a purpose driven technology entity. Zain looks to maximize its full potential as a customer-centric, future-proof, and impactful leading regional TechCo conglomerate.

The new ‘4WARD’- *Progress with Purpose* strategy comprises of four primary forces, each with three accelerators (thus 12 key accelerators) that will further progress Zain from being a Telco to a TechCo, to meet the ever-growing demand for superior and dynamic consumer and enterprise services:

1. Customer Delight:

Exceeding customer expectations by placing them at the heart of everything Zain does, achieved through delivering superior fixed and mobile connectivity experiences for consumers, businesses, communities, and governments, thus enhancing Zain’s position as a provider of choice for all

3. Purpose and Action:

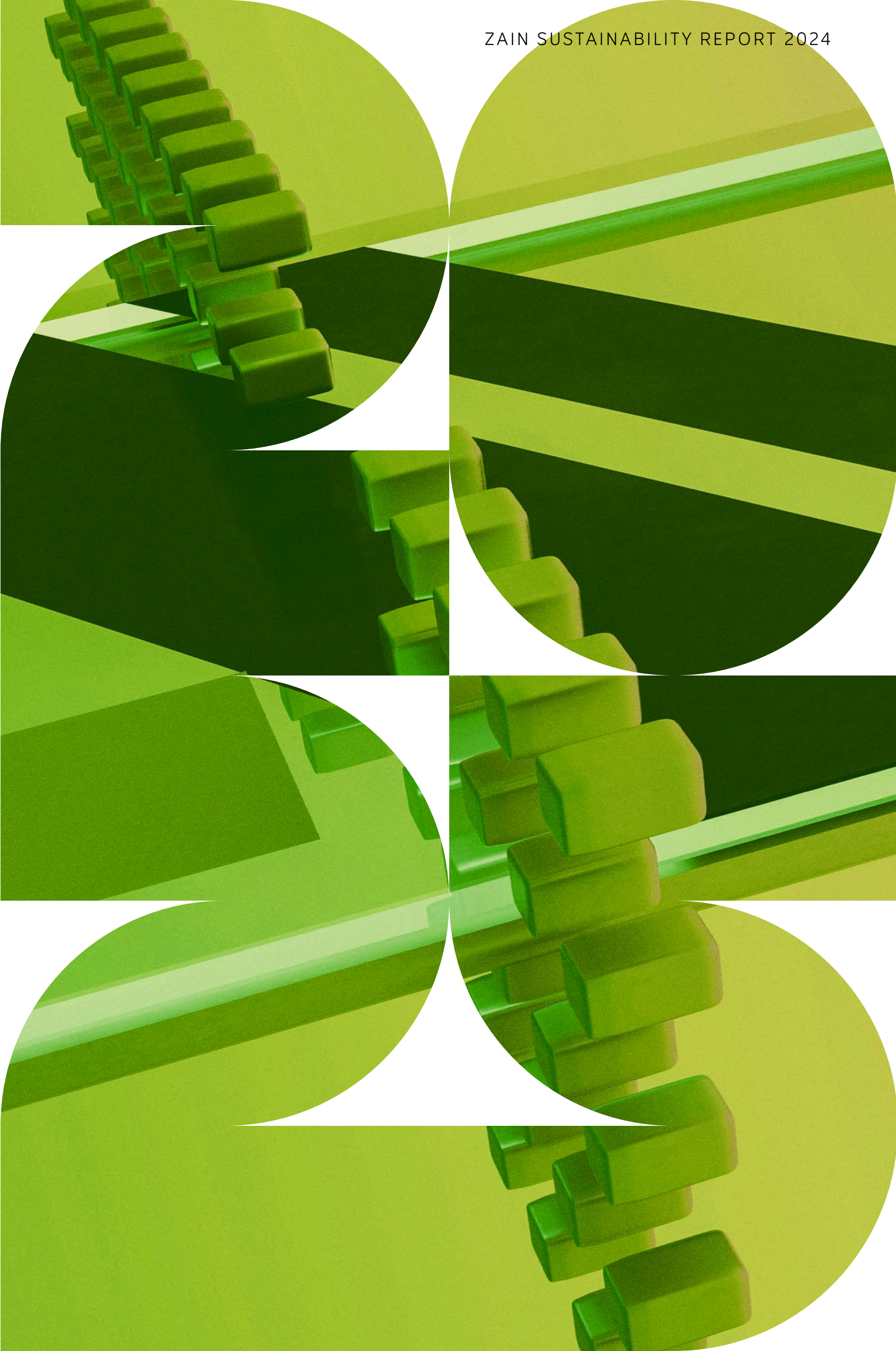
Ensuring that Zain’s actions align with meaningful impact and responsibility, through Sustainability, Inclusion, Diversity, Equity and other ESG initiatives that lead to systemic change

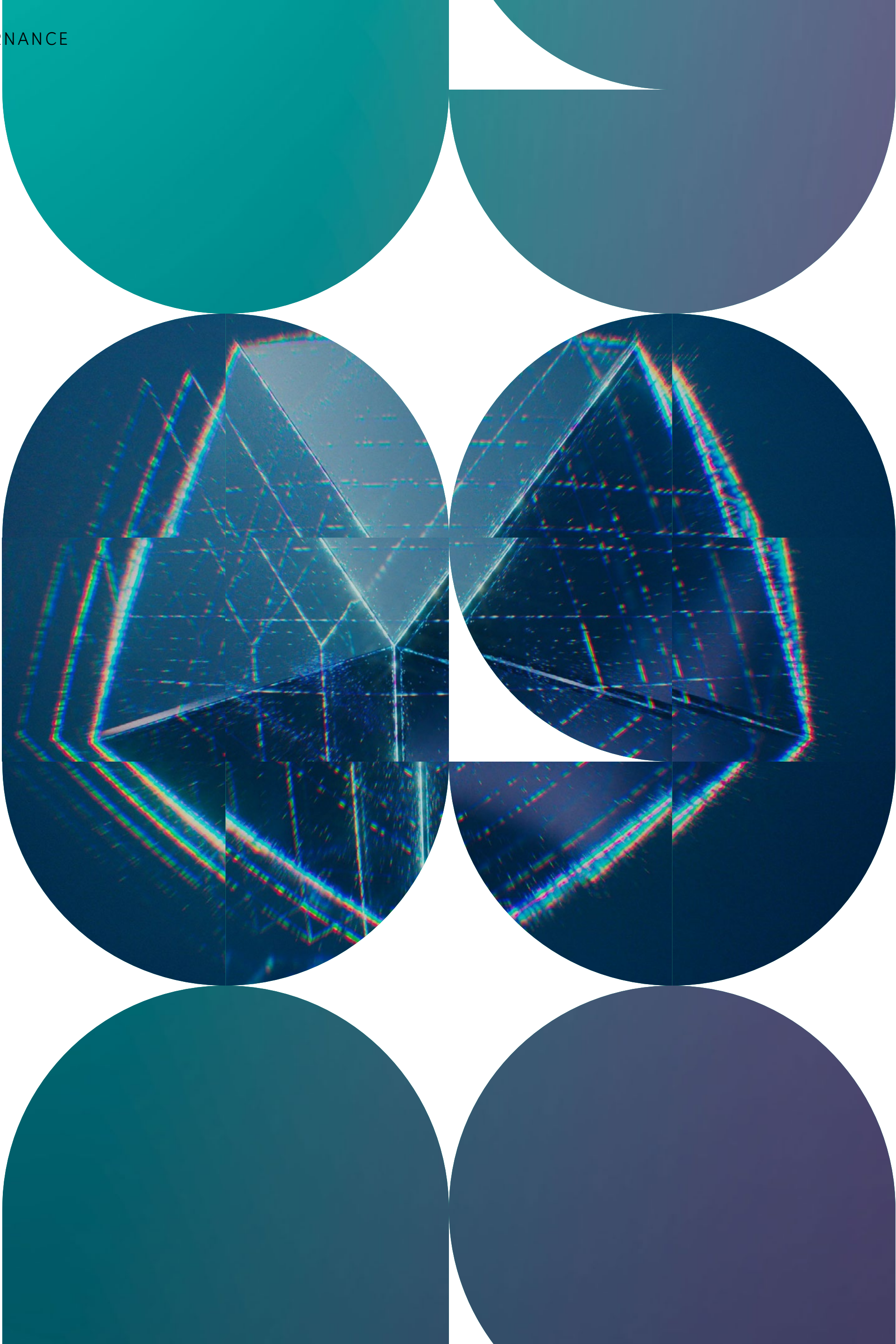
2. Digital Zain:

Elevating digital capabilities and innovation to drive expansion and growth through the further development of Fintech activities; artificial intelligence (AI) and emerging technologies; and building out digital infrastructure further

4. Collaborative Growth:

Empowerment of the company’s talented workforce, and fostering a culture of collaboration and partnerships to unlock opportunities and synergies across Zain’s ecosystem





Corporate Governance



Zain Group’s governance structure is designed to align with both local laws and international best practices, ensuring that the company remains responsive, accountable, and sustainable across all its operations.

Composition of the Board:

The Board consists of ten members, nine of whom are non-executive, including the Chairman. Two members are independent.

Board members serve a three-year term, with the possibility of extension in line with legal requirements.

Each member holds various commitments and positions of importance in line with their expertise. Details on individual members’ other commitments are outlined in the company’s annual report.

Though Zain is committed to diversity and inclusion, at present, the Board is comprised only of male members. The company’s Board diversity policy aims to foster a culture of inclusivity, actively encouraging representation from various backgrounds.

The Board members bring a wide range of competencies related to the company’s impacts. They showcase a rich diversity of skills and competencies that align with contemporary principles of Environmental, Social, and Governance (ESG) practices, driving sustainable value creation. With extensive backgrounds in investment and financial management, Board members are adept at portfolio allocation and financial strategy, particularly within sovereign wealth funds and private equity. Their telecommunications expertise, drawn from significant roles in major companies, enhances their understanding of network operations and business transformation, allowing them to align strategic initiatives with ESG goals. Additionally, strong representation in corporate governance and compliance equips the Board to navigate complex regulatory landscapes while fostering transparency and accountability, key aspects of value creation in today’s market.

Members also possess substantial project management experience, ensuring that sustainability impacts are integral to project execution. Their deep knowledge of local and international markets, especially in the MENA region, provides insights into economic diversification and investment opportunities that adhere to ESG principles. The Board’s strong academic credentials, including advanced degrees in business administration and finance, further support informed decision-making that prioritizes responsible growth. Finally, with experience across diverse industries such as banking, tourism, and technology, Board members bring a multifaceted perspective to discussions on how to balance profitability with social responsibility, ensuring that the company’s strategic direction not only meets financial objectives but also contributes positively to society and the environment.

This combination of expertise positions the Board to effectively govern and guide the company toward sustainable growth and responsible business practices, reflecting a commitment to creating long-term value for all stakeholders.

Zain emphasizes transparency and encourages shareholder participation in its Annual General Meetings (AGM), where significant decisions, including the appointment of Board members, are made. All shareholders are invited to participate without fees, ensuring comprehensive representation of stakeholder interests.

Zain Group’s governance structure is designed to ensure effective decision-making and oversight of the company’s impacts on the economy, environment, and people. Below is a description of its key committees:

Committees of the Board of Directors:

1. Board Audit Committee

The Audit Committee consists of five members, with at least one being independent. The Chairman of the Board or any executive members are not permitted to sit on this committee, following Kuwait’s laws and regulations.

2. Board Risk Committee

This Committee has five members, and as per local laws, the Board Chairman does not sit on this Committee.

3. Board Nominations and Remunerations Committee



Nomination and Selection Processes for the Board and Its Committees

The nomination and selection processes for Zain Group’s Board of Directors and its committees, follow a structured approach:

1. Nominations and Remunerations Committee

This Committee is responsible for overseeing the nomination process. Candidates for the Board of Directors are nominated based on legal and regulatory criteria as well as Zain’s corporate governance framework.

2. Selection Process

The Committee evaluates candidates based on their qualifications, experience, and alignment with Zain’s strategic objectives. After screening, the final list of candidates is presented to shareholders during the Annual General Meeting for voting.

3. Shareholder Voting

Shareholders vote on the final selection of Board members. Zain employs a secret ballot voting system to ensure transparency and fairness.

Forming Board Committees:

The formation of committees in the Board structure not only aligns with governance guidelines but also enhances the overall effectiveness of the Board in delivering value creation. By establishing specialized committees, boards can focus on key strategic areas, ensuring that decisions are made efficiently and with a clear emphasis on long-term sustainability. This approach fosters thorough oversight and accountability, allowing the company to safeguard stakeholder interests while promoting initiatives that drive value and enhance corporate performance. Committees enable

a more structured examination of specific issues, thus facilitating a governance framework that supports innovation, risk management, and sustainable growth. This alignment with value creation principles ensures that the company can navigate complexities in today’s dynamic business environment while fostering trust and engagement with stakeholders.

Criteria Used for Nominating and Selecting Board Members

Stakeholders' perspectives are considered through feedback during the AGM and ensuring that nominees align with stakeholder interests and expectations. Zain’s Articles of Association (AOA) determine the requirements and the basis on which the members of the Board are elected. The General Assembly elects Board members by secret ballot. The membership term of Board members is three years, subject to renewal, provided the independent members make up 20% or more of the Board’s composition. Independent members provide unbiased oversight and protect shareholder interests.

The AOA include more details, such as the conditions for the independence of members and the loss of membership, the Board’s responsibilities, additional requirements for the selection of the Chairman, and instructions regarding Board meetings and attendance. All items in the AOA are based on relevant laws, regulations and guidelines, and the document is available on Zain’s official website. The Board elects a Chairman and a Vice-Chairman by secret ballot, and also appoints the CEO from among the members of the Board or others.

Zain’s diversity policy emphasizes the importance of having a broad range of perspectives. This includes gender diversity, social group representation, and varied professional backgrounds to ensure balanced decision-making.

Candidates are selected based on their knowledge and expertise in areas that align with Zain’s

business impacts, such as financial management, telecommunications, regulatory compliance, and sustainability.

The Chairman of the Board at Zain

The Chairman of Zain’s Board of Directors is not an executive in the organization. This separation of roles aligns with regulatory requirements and best governance practices and ensures that the Chairman can provide independent oversight of the company’s management.

The Board’s Role and Responsibilities

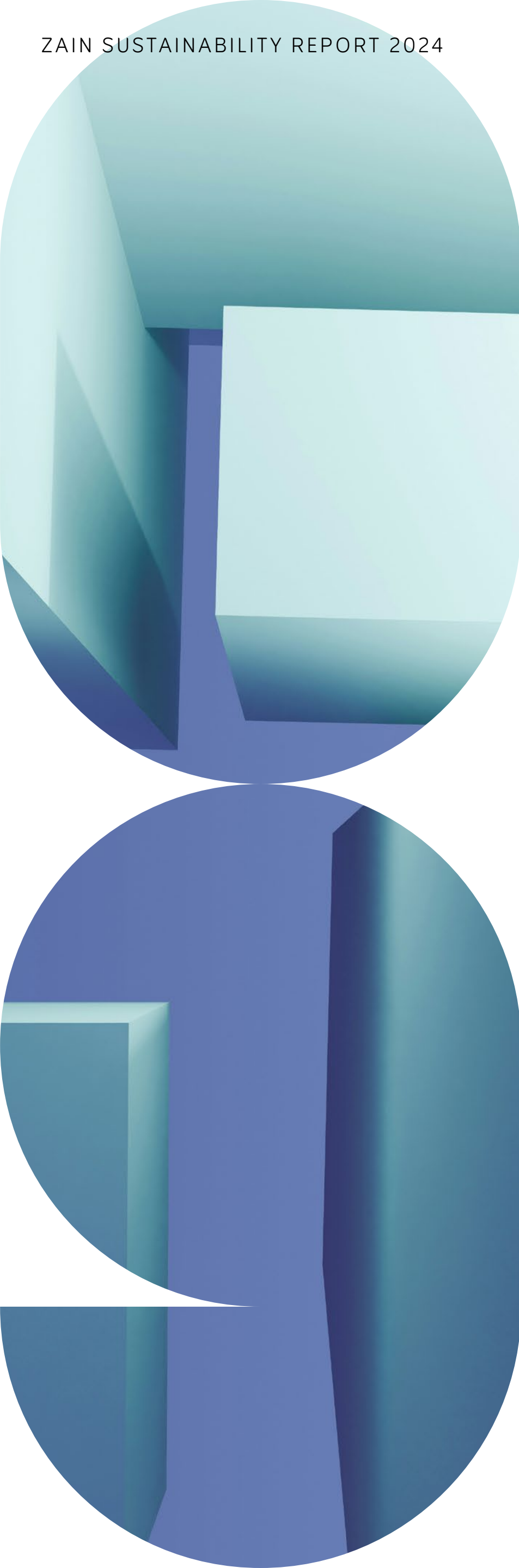
Zain Group’s Board of Directors plays a key role in shaping and approving the company’s mission, vision, and values. These are embedded within its strategic plans, which include sustainable development as a critical element. The executive management is responsible for translating the Board’s strategies into operational goals and implementing policies related to the company’s impacts on the economy, environment, and society. Zain’s Board of Directors actively oversee initiatives on climate action, human rights, and broader environmental goals. Their focus includes adopting globally recognized ESG standards. Through regular evaluations, the board ensures alignment with Zain’s long-term goals and supports sustainable innovation. This process includes assessing their impact on ESG oversight and strategic goals, helping Zain manage climate risks, innovate in sustainable tech, and add long-term value for stakeholders. Zain’s Board of Directors leads initiatives that promote children’s rights and digital safety, emphasizing secure online environments and responsible access for young users. Their approach integrates child protection with Zain’s broader commitment to ethical practices and sustainable digital innovation.

The Board ensures that sustainability principles are woven into business strategies, driving long-term value

creation. These principles encompass environmental impact reduction, ethical governance, and community development. Executive management works closely with the Board to update these frameworks as needed, ensuring alignment with both local regulations and global ESG standards (e.g., MSCI, FTSE, S&P).

The Board regularly reviews the effectiveness of the company’s processes for identifying and managing impacts. This review typically happens quarterly, where the Board’s purpose is to assess how well the company’s policies align with regulatory requirements and strategic goals.

This governance framework ensures that Zain remains accountable to its stakeholders, drives sustainable growth, and continuously improves its operational and governance standards.





Delegating Responsibility for Managing the Company’s Impacts on the Economy, Environment, and People

Appointment of Executives

Zain’s Board appoints specific executives to manage the company’s impacts. These roles include:

- Chief Sustainability Officer (CSO): Responsible for the development of the company’s sustainability strategy, oversees strategies for reducing environmental impacts, achieving net-zero emissions, and ensuring the company’s alignment with global sustainability standards. The CSO collaborates with the Board, stakeholders, and other executives to shape and implement Zain’s sustainability agenda.
- Chief Inclusion, Diversity and Equity Officer: Focuses on promoting diversity, equity, and inclusion in the workforce.
- Chief Purpose and HR Officer: Manages the company’s human capital focusing on topics such as well-being and organizational culture, aligning with the company’s overall mission and values.
- Chief Corporate Affairs & Communications Officer: Ensures compliance with corporate governance and transparency regulations, including communication on the company’s social, economic, and environmental performance.

Delegation to Other Employees

Executives further delegate responsibilities to various employees across operational levels. Specific employees within the departments of sustainability, corporate governance, and operations are given the responsibility to ensure the execution of initiatives and compliance with the company’s policies regarding its economic, environmental, and social impacts. These employees work closely with executive management to implement sustainability initiatives and monitor progress.

Reporting Process and Frequency for Managing Organizational Impacts

Executive management report back to the Board on the progress toward its strategic objectives and how the company manages its impacts. This process includes preparing quarterly performance reviews and publishing the consolidated annual Sustainability Report, Annual Governance Report, and the comprehensive Company Annual Report. These annual reports encompass all social, economic, environmental, and human rights-related impacts and are provided by the management to the Board for review and final approval.

These reporting efforts reflect the Board’s commitment and oversight on Zain’s sustainability strategies and outcomes. It also empowers executives and employees to manage and address sustainability challenges efficiently.

Governance and Reporting Process

A. Responsibility of the Board

The Board of Directors, is responsible for reviewing and approving the reported information, including the company’s material topics. The process for reviewing and approving the information generally includes the following steps:

1. Reporting Intervals: Executive management provides comprehensive reports to the Board at regular intervals, such as quarterly, semi-annually, or annually. This ensures that the Board receives timely updates and can effectively monitor the company’s performance.
2. Detailed Reporting: The reports submitted to the Board cover key performance indicators, progress updates on sustainability KPIs , initiatives undertaken, challenges faced, and future action plans. These reports are detailed and include both qualitative and quantitative data, relevant metrics, and benchmarks as needed.
3. Holistic Understanding: The reports provide a comprehensive view of the company’s sustainability performance and its impacts on the economy, environment, and people. This includes insights into regulatory environment, emerging trends, risks, and opportunities.
4. Review Process: The Board conducts assessments of the reported data. This involves evaluating the alignment of the information with the company’s strategic objectives, stakeholder commitments, and industry standards.
5. Specialized Committees and Auditors: The review process often involves specialized committees, independent auditors, and internal stakeholders to ensure a robust governance framework. These entities facilitate detailed discussions, analyses, and recommendations.

6. Final Approval: The Board’s final approval of the reported information signifies the company’s commitment to transparency and accountability. It reinforces trust and confidence among shareholders, stakeholders, and the broader business community.

Conflicts of Interest

Zain implemented a robust governance framework designed to uphold transparency and accountability. Central to this framework is a conflict-of-interest policy that ensures potential conflicts between personal and company interests are managed effectively. The Board of Directors and executive management are required to disclose any actual or potential conflicts of interest in line with this policy, which aligns with local legal requirements and global best practices.

Key processes for preventing and mitigating conflicts include:

- Disclosure Requirements: Board members must declare any personal interests related to company business or contracts to ensure transparency.
- Voting Restrictions: If a Board member has a personal interest in a decision, they are prohibited from participating in the relevant vote. This practice mitigates the risk of biased decision-making.
- Independent Expert Review: For transactions valued at 10% or more of the company’s total assets, an independent expert is appointed to submit a report to the General Assembly. This measure ensures objective evaluation before approving such transactions.
- Comprehensive Investigations: The Board investigates all reported conflicts of interest, assessing the extent and intentions behind the conflict. Where a Board member is involved, they are excused from the discussions to prevent undue influence.
- Disciplinary Measures: In cases where conflicts are confirmed, the Board retains the authority to impose disciplinary actions, including potential suspension or termination of employment.

The conflict-of-interest policy is a vital component in Zain’s value creation strategy, ensuring that the governance structure promotes long-term sustainability by aligning business practices with stakeholder interests. Transparency, accountability, and stakeholder engagement are key ESG tenets that Zain upholds through its Governance Framework. To ensure alignment with these standards, awareness training material on conflict of interest was distributed to all employees across our operations. This training serves to reinforce the importance of upholding these ethical guidelines and ensures all employees are equipped to recognize and address potential conflicts of interest. This proactive stance not only mitigates risk but also fosters trust with shareholders, employees, and the broader community, supporting the company’s value creation efforts in a competitive and responsible manner.

B. Disclosure of Conflicts of Interest to Stakeholders

Zain is committed to full transparency regarding conflicts of interest, disclosing such matters to all relevant stakeholders, including shareholders, directors, employees, and regulatory bodies. The company’s governance framework outlines the following key areas for disclosure:

- i. Cross-Board Membership: Zain requires Board members to disclose any memberships on boards of other organizations, particularly where such memberships might present a conflict of interest. These disclosures are recorded and discussed at Board meetings to prevent any influence.
- ii. Cross-Shareholding with Suppliers and Stakeholders: If a Board member or executive management holds shares in a supplier or other stakeholders, these interests must be disclosed in line with the conflict-of-interest policy. The Board evaluates such disclosures to ensure impartiality in business decisions.



- iii. Existence of Controlling Shareholders: Any transactions or arrangements involving controlling shareholders are carefully monitored. Independent reports are generated for transactions exceeding 10% of the company's total assets, with the findings presented to the Board and eventually to the AGM. This ensures that controlling shareholders do not exercise influence over company operations.
- iv. Related Parties Transactions Policy: The policy ensures that all related-party transactions, including relationships, transactions, and outstanding balances, are disclosed to the Board and stakeholders. These disclosures are also subject to auditor review, adding another layer of scrutiny to safeguard stakeholder interests.

Communication of Critical Concerns to the Board

Zain developed a comprehensive Whistleblowing policy that serves as a key mechanism for communicating critical concerns to the Board. This policy empowers employees and stakeholders to report any instances of misconduct, unethical behavior, or violations of environmental or social responsibilities. Reports submitted through this confidential and secure platform are treated with utmost seriousness and are swiftly escalated to the Board of Directors or executive management when deemed critical.

Critical concerns are communicated through a structured process that involves:

- Confidential Reporting Channels: Zain provides secure, anonymous channels for employees and stakeholders to report concerns, which include issues relating to governance, ethics, and violations of ESG principles.
- Direct Escalation: Once a report is received, internal mechanisms ensure that serious matters are escalated promptly to the Board for immediate review and action.

- Regular Updates: The executive management also provides the Board with periodic updates on the status of reported concerns, ensuring that the Board is informed of the nature, extent, and corrective actions related to these issues.

This process strengthens Zain's governance structure by embedding transparency and accountability into decision-making processes. By addressing critical concerns efficiently, Zain not only mitigates potential risks but also enhances its value creation, as a company committed to ethical practices, long-term sustainability, and stakeholder trust.

During the reporting period, no critical concerns were communicated to the Board.

The Board and Sustainable Development

Zain places a strong emphasis on advancing the knowledge, skills, and experience of its Board in sustainable development. To achieve this, the company continuously updates training programs for Board members to include relevant ESG principles, industry-specific guidelines, and emerging regulatory requirements. These training modules equip the Board with the knowledge necessary to proactively address sustainability challenges and align the company's operations with its broader objectives of responsible growth and value creation.

Board Evaluation

The Board conducts a self-assessment process annually to evaluate its performance in overseeing the company's impacts on the economy, environment, and people. This comprehensive evaluation assesses the Board's effectiveness in several key areas:

- Governance and Compliance: Ensuring adherence to corporate governance principles and ethical standards.
- Strategic Direction and Decision-making: Evaluating the Board's role in setting strategic goals and integrating sustainability into business strategies.
- Risk Management: Reviewing the Board's effectiveness in identifying and mitigating ESG-related risks.
- Stakeholder Engagement: Measuring the Board's communication and engagement with shareholders, employees, and other key stakeholders.
- Financial Oversight: Ensuring the sustainability of the company's financial health through responsible financial oversight.

Through this evaluation, the Board assesses its alignment with Zain's mission and vision, particularly in terms of creating long-term sustainable value.

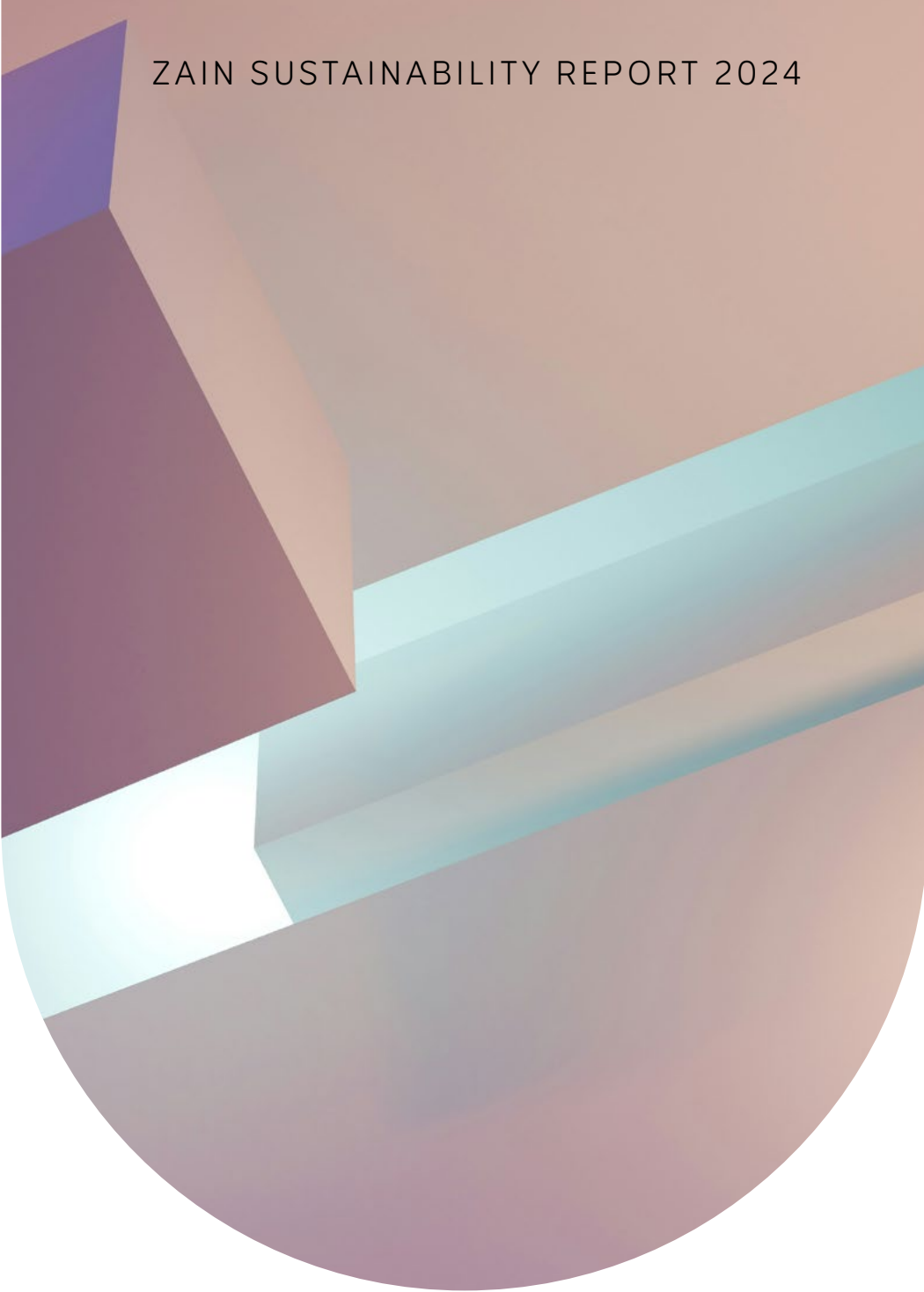
A. Independence and Frequency of Evaluations

The evaluations of the Board are conducted annually to ensure a regular and systematic review of the Board's performance in overseeing the company's ESG impacts. While the evaluations are not independent, they are comprehensive and incorporate best practices, including criteria used by PwC in previous years. The Board also includes amendments to reflect recent regulatory trends and sustainability requirements, making the process robust and aligned with evolving governance standards.

B. Actions Taken in Response to Evaluations

Based on the findings from the self-assessments, the Board takes several key actions to enhance its governance practices:

1. Updating Training Plans: In response to identified gaps, the Board refines its training programs to ensure that members are current with the latest ESG trends, regulations, and best practices.
2. Enhancing Board Composition: Changes to the Board's composition, where necessary, including adding an independent member who brings a strong background in corporate governance, risk management, and finance, with extensive experience consulting for regulatory bodies and overseeing banking institutions. His expertise includes chairing risk and investment committees, contributing to the development of governance policies, and participating in key government initiatives aimed at improving performance and sustainability.
3. Organizational Improvements: Adjustments are made to organizational practices, particularly around risk management, governance, and stakeholder engagement, to align with sustainable business practices and the company's long-term objectives.





Anti-Corruption

The Board plays a pivotal role in establishing a robust control framework that integrates a comprehensive set of standards, processes, and structures, ensuring effective internal controls throughout the organization. It oversees the implementation of a thorough anti-corruption system, closely monitoring the executive management’s performance in executing the policy. A key priority of the Board is to embed awareness of the anti-corruption policy within the corporate culture, highlighting its critical importance. Notably, in 2024, Zain incurred zero costs related to corruption fines or penalties, reflecting the strength of its governance practices.

In addition, the Board maintains open and transparent communication with shareholders and stakeholders, ensuring the timely and accurate disclosure of essential information. This approach is in line with the highest industry standards, promoting accuracy, coherence, and credibility. Both the Board and executive management are committed to addressing the company’s social impacts and creating sustained value for its communities in an inclusive and progressive manner.

Zain’s anti-corruption policies and procedures were communicated to all relevant stakeholders, including Board members, employees, business partners, and suppliers, across all the company’s operational markets. The policy is also publicly available on the company’s website, ensuring easy access for all stakeholders to familiarize themselves with the company’s ethical standards.

Board members, employees, and other stakeholders were provided with training on the anti-corruption policy through email communications and video materials, available on the company’s website. To ensure accountability, tracking mechanisms have been implemented to verify that all stakeholders have received and reviewed the information, and this will continue to be monitored throughout 2025.

In 2024, the Board met for a total of 11 meetings. Meetings between the Board and Zain’s executive management occur periodically or as necessary. The Board delegates authority over economic, social, environmental, and human rights matters to the executive management team, in alignment with the specific responsibilities of each senior executive. Zain is committed to aligning its business strategy with its Corporate Sustainability strategy, which focuses on delivering "Meaningful Connectivity" that drives systemic change.

Incidents of Corruption: Zain reported zero confirmed incidents of corruption during the course of 2024. No employees were dismissed or disciplined for corruption-related activities. No contracts with business partners were terminated or not renewed due to corruption violations. There were no public legal cases brought against the company or its employees regarding corruption during the reporting period.

The Board meets with Internal Audit, Risk Management, and Finance teams at least quarterly, as mandated by laws and regulations, receiving regular updates on performance and strategy. Additionally, the Board retains the discretion to invite any member of the executive management to participate in these meetings as needed.

Remuneration Policies for Members of the Board and Executive Management

A. Remuneration Policy Overview:

Zain’s remuneration policy ensures a balance between fixed, and variable pay for members of the Board and executive management. Fixed remuneration is based on the responsibilities and the specific career paths of individuals, reflecting their value to the company. Variable remuneration, on the other hand, is tied to the achievement of predefined goals, both financial and non-financial, to motivate and reward executive management based on individual and company performance.

- i. Sign-on Bonuses or Recruitment Incentive Payments:

Sign-on bonuses or recruitment incentives are provided as needed, particularly when attracting top-tier talent. These incentives are aligned with the company’s strategic objectives and competitive market conditions.

- ii. Termination Payments:

Termination payments are included as part of the approved contractual agreements, compliant with applicable laws. These may consist of end-of-service indemnity as stipulated by Zain’s human resources policies and contractual agreements.

- iii. Retirement Benefits:

Retirement benefits include end-of-service indemnities and other benefits as per the applicable laws and regulations, ensuring that these packages remain competitive and aligned with Zain’s human resources policies.

Board Remuneration

The total remuneration for the Board shall not exceed 10% of the company’s net profits, calculated after accounting for depreciation, reserves, and the distribution of dividends to shareholders, which will not be less than 5% of the company’s capital, or a higher percentage as outlined in the Articles of Association.

Board remuneration is subject to approval during the Annual General Meeting of shareholders, based on recommendations from the Board Nomination and Remuneration Committee (BNRC) and the Board itself.

The Executive Management Remuneration System considers the operational environment, performance results, and the company’s risk tolerance. The key components of this system include:

Fixed Remuneration

Fixed remuneration is determined by the level of responsibilities assigned and the specific career path of each executive member. A remuneration index is established for each position, reflecting its value to the company. This index is reviewed annually by the BNRC, in collaboration with relevant departments such as Human Resources, to reassess the total remuneration package, market conditions, and the performance of various divisions. Fixed remuneration encompasses salaries, allowances, benefits, and end-of-service indemnities, all awarded in accordance with the approved salary and grading structure, applicable laws and regulations, and the manual of contractual agreements issued by Human Resources.

Variable Remuneration

Variable remuneration is contingent upon the achievement of predefined goals and is designed to motivate and reward members of executive management. Variable bonuses are allocated based on both individual performance and the overall

performance of the company. At Zain, variable remuneration consists of two elements: annual variable remuneration, granted to employees on a yearly basis, and multi-annual variable remuneration, awarded over multiple years to emphasize the Board’s focus on short-, medium-, and long-term objectives. The annual objectives include both financial indicators, representing financial targets for the company and its departments, and non-financial indicators, reflecting operational objectives achieved through specific activities and initiatives, such as product launches or strategic investments.

Independent Oversight:

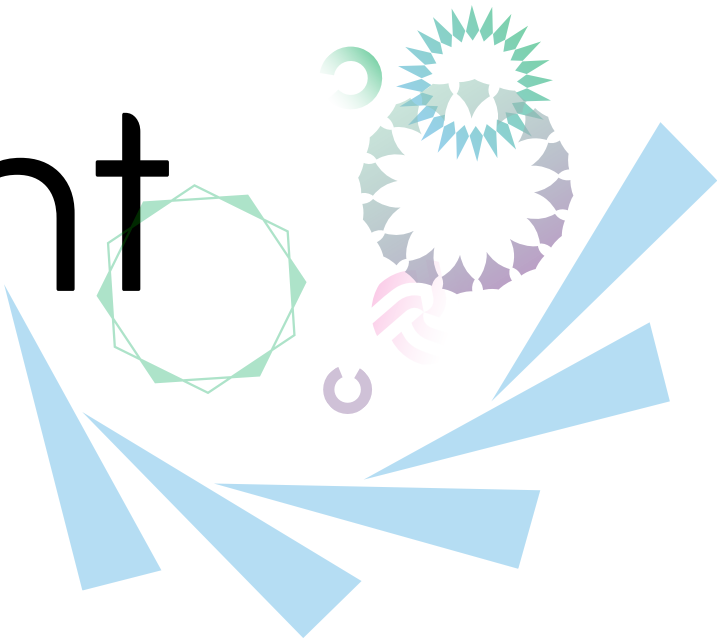
The BNRC oversees the design and implementation of Zain’s remuneration policies. It operates independently, ensuring that remuneration aligns with best practices in good governance, shareholder interests, and regulatory requirements. Annually, the BNRC reviews and updates the remuneration policy to reflect changes in the market and internal performance.

Reporting of Stakeholder Votes:

Votes on remuneration policies and proposals are conducted during the AGM, where shareholders are invited to vote on the recommendations made by the BNRC. Results of these votes are disclosed transparently as part of Zain’s commitment to good governance and accountability.



Enterprise Risk Management



As the security threat landscape grows increasingly complex, it is characterized by rapid technological advancements. Zain recognizes the need to remain adaptable and vigilant as emerging threats such as ransomware, phishing, and zero-day exploits demand a dynamic approach to risk management. To navigate these challenges, Zain employs a proactive, relevant, and agile Risk Management Framework capable of addressing current and future risks.

The Enterprise Risk Management (ERM) department plays a critical role in this Framework by identifying, assessing, prioritizing, and managing risks proactively. This approach enables the organization to make informed strategic decisions while staying ahead of evolving threats. A key example is the annual evaluation of information security controls to ensure they remain effective in countering the fast-evolving security landscape. This continuous adaptation strengthens Zain’s ability to safeguard its operations and maintain resilience in an increasingly volatile environment.

The ERM function reports directly to the Board Risk Committee (BRC), which supervises the adherence to risk management policies and procedures and the effectiveness of the Risk Management Framework. The BRC reviews and approves the Framework on an annual basis, and risk trends are reviewed on a quarterly basis. Other functions such as Internal Audit and Corporate Governance departments, and their respective Board committees, along with Group Risk Management, assist the BRC in its oversight.

Zain’s ERM function, in close alignment with the company’s Corporate Sustainability strategy, evaluates the company’s social, economic, and environmental impacts from a risk standpoint through proactive research and extensive engagement with stakeholders. Since 2019, the key considerations have been the risks and opportunities associated with climate change and its material impact, allowing for early-stage planning of mitigation strategies across Zain’s operating markets.

Climate-Related Risks and Opportunities are explained in depth in the Task Force on Climate-Related Financial Disclosures (TCFD) report on this [page](#).

Membership Associations from a Risk Perspective

As a member of both the GSMA and the International Telecommunication Union (ITU), Zain actively engages with global initiatives to foster innovation and enhance connectivity. Through its GSMA membership, Zain participates in key events like the Mobile World Congress, collaborating with industry peers and exchanging insights on topics such as roaming, interconnectivity, and security.

In its role within the ITU, Zain contributes to global efforts to facilitate seamless international communication by supporting the development of technical standards, global radio spectrum management, and initiatives aimed at improving access to ICTs for underserved communities worldwide.

Risk Management Framework

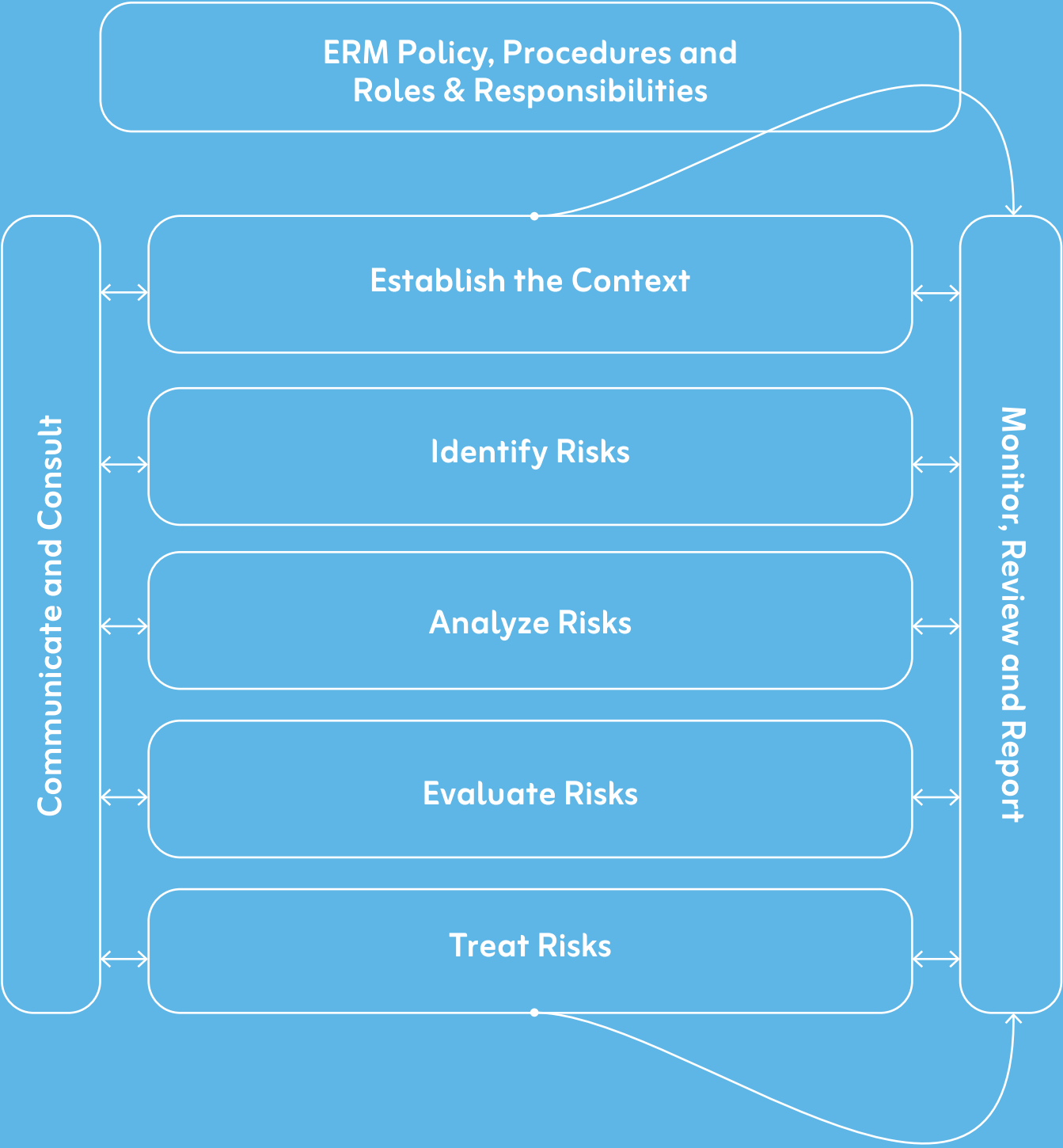


Figure 1: Zain Risk Management Framework (alignment to ISO 31000)



All security events that affect Zain are analyzed based on the risk rating. The risk rating is determined by an impact-likelihood matrix across Zain’s operations. The various factors that are assessed to determine the impact include financial, reputational, climate change, markets, customers, employees, and others. The rating also takes into consideration the pre- and post-mitigated status of the risks, providing information on both the inherent and residual risk status of the organization.

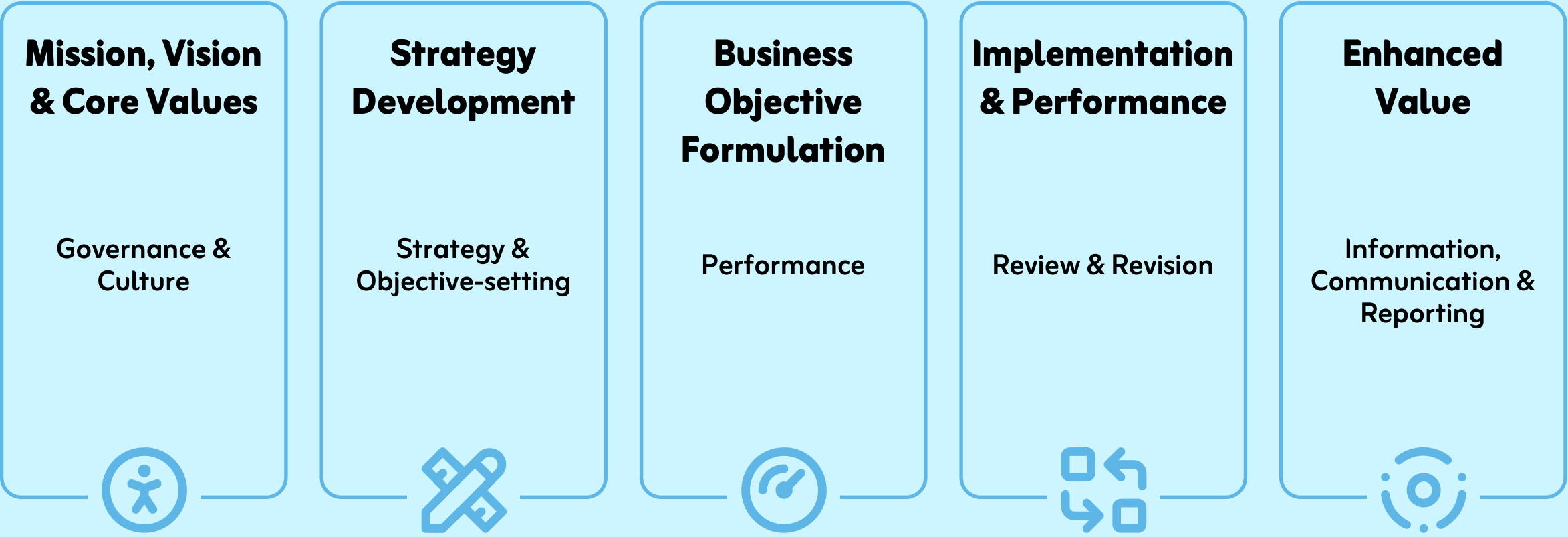


Figure 2: Zain Risk Management Framework (alignment to Committee of Sponsoring Organizations Framework)

Precautionary Principle

When Zain designs its products, delivers services, or even implements internal security technologies, it follows a precautionary principle by considering all relevant environmental requirements. Key risks, such as rapid technological advancements, are closely monitored by the BRC, the Climate Action Committee, and the Board. Zain's business prioritizes the development and delivery of low-carbon products and services to meet customer needs. Zain also ensures that when a specific security solution is selected for implementation internally, climate-related factors, including energy consumption, heat dissipation and end-of-life disassembly for repair or reuse are taken into consideration and are integral to the product and service design checklist.

The company’s product design and procurement teams engage with suppliers to develop products with lower eco footprints. The checklist used as part of the design process includes climate-related considerations such as energy use and end-of-life disassembly for repair or reuse. For security solutions implemented internally, vendor selection takes into consideration the heat dissipation and power consumption values in the final scoring.

Data Protection and Privacy

Zain considers data privacy as a vital control to prevent data leakage. To comply with applicable laws and regulations, the company is committed to safeguarding the ‘personally identifiable information’ (PII) entrusted by its customers, employees, suppliers, and other stakeholders, including the processes involved in collecting, using, retaining, and securing this information.

In 2023, Zain introduced a new Data Protection and Privacy Policy to uphold the highest standards of data protection and privacy for all stakeholders. Approved by the Board, this policy ensures Zain's compliance with relevant data protection and privacy laws and regulations. The updated policy outlines the principles and guidelines for collecting, using, and storing personal data, as well as the rights of individuals to access and control their data. Zain is dedicated to protecting and respecting the privacy of all data subjects who engage with the company, maintaining security and transparency. Data protection and privacy principles are embedded across our operations Group-wide to prevent misuse that could harm stakeholder interests or the company’s reputation.

The policy can be found on this [link](#).

Policies and practices related to collection, usage, and retention of customer information and PII for each Zain operating company:

Zain Bahrain

Please refer to the link below for more details:

<https://www.bh.zain.com/en/copyright/privacy-policy>

Zain Iraq

Zain Iraq does not use any customer data gained from website for Behavioral Advertising.

Zain Jordan

A new law for data protection was introduced in Jordan, where Zain is still in the process of assessing the risk for PII data and is to set policies and corrective actions accordingly.

Zain Kuwait

CITRA's data privacy protection regulation is applicable to both public and private sectors that collect, process and store PII. Zain appointed a Data Privacy Officer responsible for overseeing appropriate technical and regulatory controls to comply with the regulations.

CITRA's data privacy protection regulation is applicable to both public and private sectors that collect, process and store personally identifiable information (PII).

Zain Saudi Arabia

Zain has a data privacy policy that is established and approved by the Saudi Data and AI Authority (regulating authority).

Zain Sudan

Zain ensures customer information and PII is protected through policies such as its Code of Conduct and customer care process guidelines.

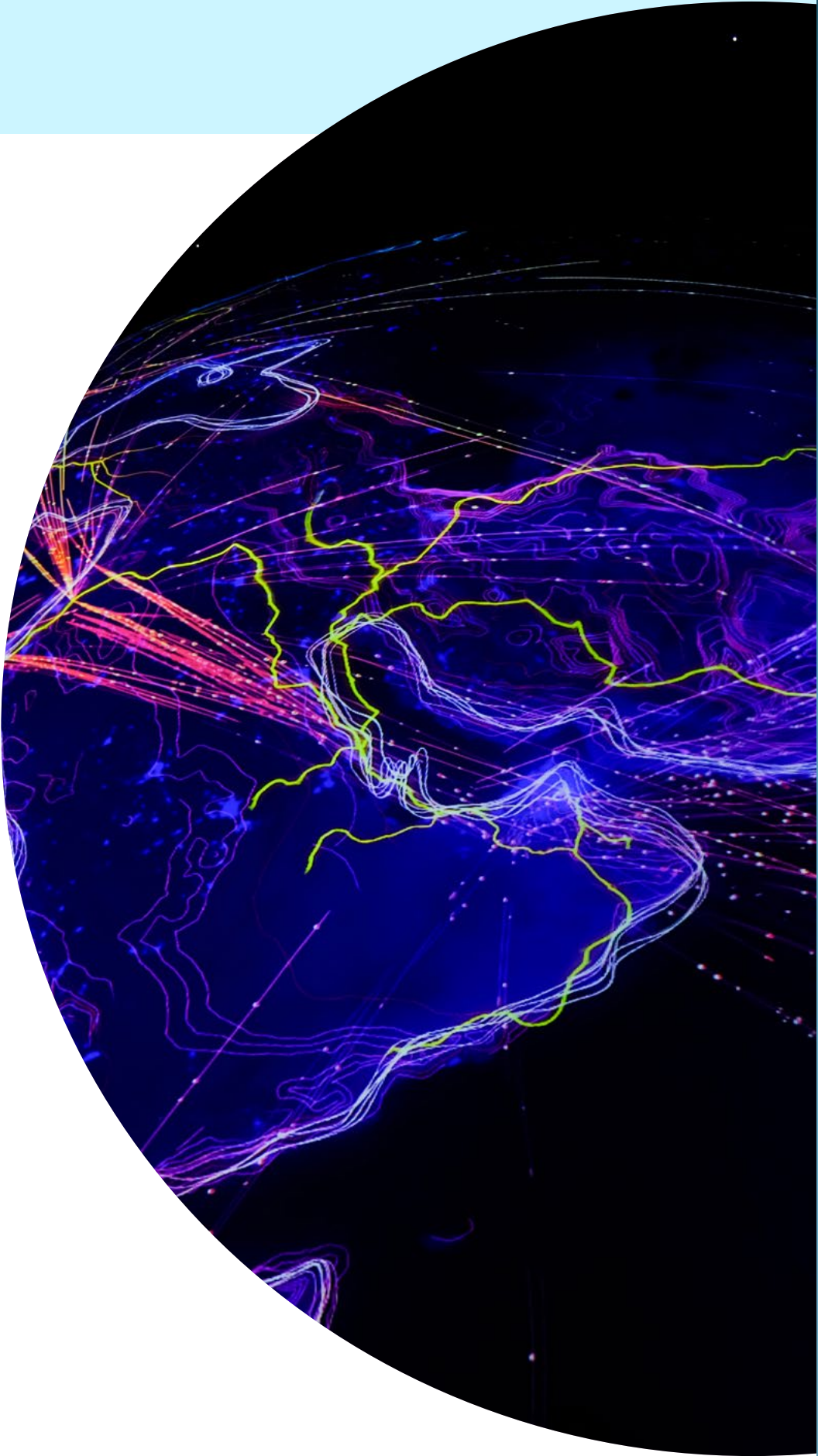
Zain South Sudan

South Sudan is following best practices and security controls are enhanced year-on-year to improve its maturity and protect data.

Customer Information for Secondary Purposes

As per the Sustainability Accounting Standards Board's (SASB) definition of secondary purpose, Zain's operations process data for designing products to enhance the quality of services offered to customers. However, customer information and the usage of data is not transferred or shared to third-parties unless requested by law enforcement, in which case it takes place via a judicial order.

As of 2024, there have been no reports or complaints from third-parties or regulatory bodies, or the identification of leaks or losses of customer data.





Data Security

Zain remains committed to enhancing the security of its operations by continuously implementing new security technologies, improving its overall security posture. As part of this effort, the company conducts multiple assessments to identify vulnerabilities and ensure defenses remain robust.

Management approach to identifying and addressing data security risks

To address evolving security threats, Zain adopts a proactive approach through risk assessments and the implementation of robust data security controls in addition to the existing security policies and procedures. Moreover, as Zain stores and processes confidential information, regular assessments are conducted to identify vulnerabilities, emerging risks, and evolving attack vectors, ensuring that our defenses remain current.

By deploying layered security controls such as firewalls, encryption, intrusion detection systems, and access management, we create multiple barriers against unauthorized access. Monitoring tools and incident response plans further enhance our security by enabling early detection and prepare for potential breaches.

The following is an illustration of a framework referenced in Zain’s cyber resilience strategy.

Below are some initiatives undertaken by Zain across the operations.

- Vulnerability assessments
- Penetration testing
- Telecom signaling security assessment
- Regular security awareness on relevant topics
- Incident and breach handling and notification to related authorities
- ISO 27001 Information Security Management System certification
- New security solutions implemented

Managing Systemic Risks from Technology Disruptions

Mission-critical services demand uninterrupted availability, as any downtime is unacceptable and can lead to immediate and severe consequences. Zain actively monitors its key systems to detect and address any disruptions.

Description of systems to provide unimpeded service during service disruptions

Core: Includes PS Core and CS Core (previously mentioned in prior Zain’s Sustainability Reports).

CS Core: Circuit Switch, handling voice calls and containing functionalities such as mobile switching Center (MSC) and gateway MSC (GMSC).

PS Core: Packet Switch, handling data sessions and containing functionalities such as Serving GPRS support node (SGSN), gateway GPRS support node (GGSN), domain name server (DNS), dynamic host configuration protocol (DHCP) server, packet charging gateway, etc.

Charging: System for customers to recharge their accounts with credit and maintain balance information. Used by prepaid and postpaid customers.

Zain Group	
System	Availability
ERP	99.99%
Oracle Hyperion	100%
Zain Group Website	100%

Zain Bahrain	
System	Availability
Core	99.85%
Charging	100%
Website	98.74%

Zain Iraq	
System	Availability
Core	100%
Charging	100%
Website	100%

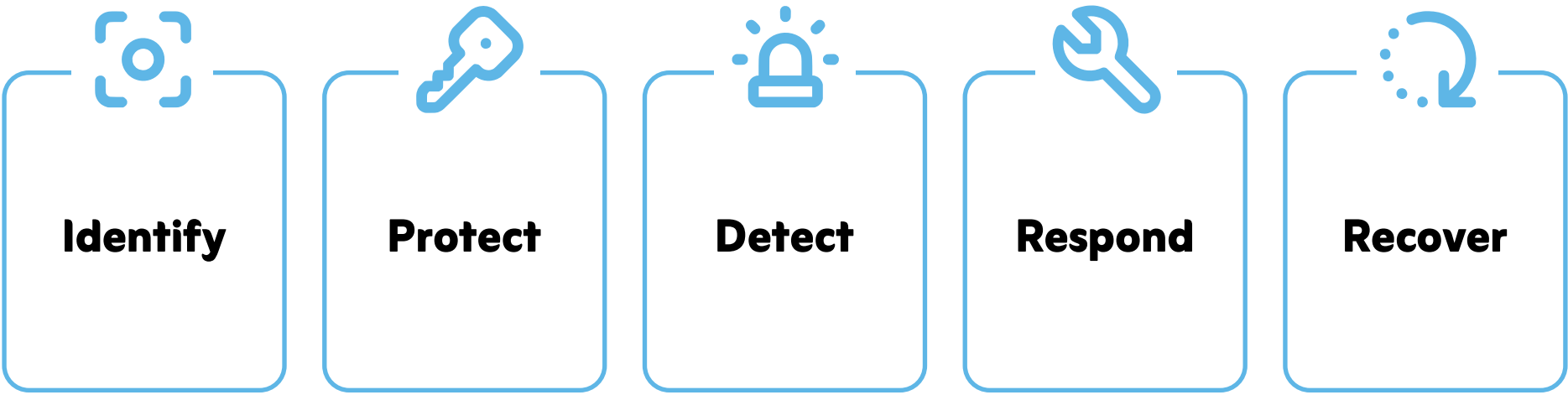
Zain Jordan	
System	Availability
Core	99.99%
Charging	100%
Website	99.72%

Zain Kuwait	
System	Availability
Core	100%
Charging	100%
Website	100%

Zain Saudi Arabia	
System	Availability
Core	100%
Charging	99.82%
Website	99.72%

Zain South Sudan	
System	Availability
Core	100%
Charging	99.99%
Website	100%

Zain Sudan	
System	Availability
Core	86.53%
Charging	99.80%
Website	63.52%





Security Risk Training

Since 2020, Zain’s PAUSE.THINK.ACT Cyber security Awareness Program has equipped Zainers with the knowledge and skills needed to recognize and respond to potential threats. Through this program, employees learn to identify phishing attempts, follow secure practices, and understand their role in protecting the company. Various channels are used by operations such as email newsletters, SMS, in-person and online training, and induction meetings and workshops. By fostering a culture of vigilance and accountability, information security becomes a shared responsibility, reducing risks and enhancing Zain’s overall security posture.

Information security topics covered in 2024

- Business Continuity
- Incident Handling
- Signs of Phishing
- Safe Internet Browsing
- Smishing & Vishing
- Malvertisements
- Malicious Downloads
- Social Engineering Red Flags
- Mobile Device Security

2024 Awareness Updates

	Kuwait	Bahrain	Iraq	Jordan	Saudi Arabia	Sudan	South Sudan
Total Staff	1,752	223	916	1,236	1,792	766	155
Total Number of Staff that received awareness content	1,752	223	916	1,236	1,792	766	155
Total number of channels utilized	4	4	2	4	3	2	5
Channels utilized	Corporate email Newsletter SMS Induction Assessment program	Learning Platform Instructor Lead Sessions LinkedIn Learning Digital Learning	In-Person Training Online Training	Corporate Email Instagram Internal Learning System, Infographics Phishing Simulation	Workshops Awareness Campaign Awareness Email	Corporate Email Newsletter Teams Sessions	Corporate Email Newsletter WhatsApp SMS In-Person Sessions Teams Meeting

The following list consists of the cyber security training courses undertaken by Enterprise Risk Management employees across Zain’s operations.

- Fortinet Certified Professional Public Cloud Security
- Fortinet Certified Solution Specialist Security Operations
- Cybersecurity Foundations: Governance, Risk, and Compliance (GRC)
- IT Security Foundations: Network Security
- Security Incident Response and Digital Forensics
- Security Operations and Management

Initiatives with External Stakeholders

Initiative	Date of Adoption	Opcos in Scope	Nature of Initiative (Binding/Voluntary)	Range of Stakeholders involved
Information Security Management System ISO 27001	10-Jan-24	Zain Bahrain	Binding	Telecommunication Regulatory Authority
	22-Nov-23	Zain Iraq	Voluntary	AQC
	29-Jan-23	Zain Kuwait	Voluntary	DNV-GL
	21-Jun-23	Zain Jordan	Voluntary	SGS
	30-Aug-23	Zain KSA	Voluntary	Intertek
Business Continuity Management System ISO 22301	29-Jan-23	Zain Kuwait	Voluntary	DNV-GL
	01-Apr-24	Zain Jordan	Voluntary	SGS
	30-Aug-23	Zain Saudi Arabia	Voluntary	Intertek
Quality Management System ISO 9001:2015	15-Jan-24	Zain Bahrain	Voluntary	DNV-GL
IT Service Management System ISO 20000-1	31-Jan-23	Zain Kuwait	Voluntary	DNV



Sustainability Risks Impacting Risk Management

Physical risks: As we progress as an organization, we are continuously evolving and changing the way we address climate-related risks and opportunities to ensure the sustainability of our operations. Below highlights the physical and transition risks associated with rising energy costs and global warming, along with our strategies to mitigate these challenges.

Each Zain operation monitors the pattern of fuel and electricity consumption and reports to the Group on a quarterly basis. Fuel and electricity consumption patterns are analyzed to assess variations.

In case energy consumption increases more than 10% quarter-on-quarter, the concerned operations are required to provide details and justifications for such changes. We took the reference of Coupled Model Intercomparison Project, Phase 6 (CMIP6) models included in the IPCC's Sixth Assessment Report (AR6).

Global warming of 1.5C relative to 1850–1900 would be exceeded during the 21st Century under the intermediate, high, and very high greenhouse gas (GHG) emissions scenarios considered in this report (SSP2-4.5, SSP3-7.0 and SSP5-8.5, respectively).

For our analysis, we selected the following SSP scenarios: SSP1 – 1.9: Sustainability Road, SSP2 – 4.5: Middle of the Road, SSP5 – 8.5: Fossil fuel development. We have taken the following estimations per opco: SSP1 1.9 2039 and 2050: Kuwait (0.38, 0.43), KSA (0.27, 0.40), Bahrain (0.38, 0.38), Iraq (0.25, 0.26), Jordan (0.16, 0.17), Sudan (0.14, 0.18) and South Sudan (0.22, 0.33).

SSP5 8.5 2039 and 2050: Kuwait (1.06,2.33), Saudi Arabia (1.1, 2.41), Bahrain (0.99, 2.15), Iraq (1.18, 2.52), Jordan (1.06, 2.3), Sudan (0.9, 2.03), South Sudan

(0.68, 1.59). SSP2 4.5 2039 and 2050: Kuwait (0.98, 1.76), Saudi Arabia (1.02, 1.79), Bahrain (0.86, 1.55), Iraq (1.1, 1.86), Jordan (1.02, 1.71), Sudan (0.86, 1.54), South Sudan (0.65, 1.26).

The timeframes mentioned are the ones covering our net-zero timeline, but our analysis went beyond 2050 to provide an understanding of the extent to which our business could be impacted in the long-run.

Transition Risk: Increases in energy tariffs will lead to an increase of energy costs for the operation of our telecom/IT sites

During the assessment of climate-related risks for our core site, offices, and base station facilities, we identified that there could be an increase in operational expenditure due to fuel tariff hikes and grid power units in our areas of operation.

Our biggest operating costs are energy-related to cater to cooling requirements for our telecom and IT systems that require temperatures of approximately 23°C for optimum performance, which is much lower than ambient temperatures in our operations. Our total energy consumption in 2024 was 129.77 MWh and 1066.42 million liters of diesel across seven operations. The 2024 overall energy cost based on actual nine-month operations ending September 2024 and estimated for the calendar year is estimated at USD 155.26 million.

Opportunities

The availability of a reliable universal grid supply is essential for economic growth and the alleviation of poverty. While the South Sudanese government's desire to modernize and extend on-grid coverage and introduce additional generation capacity is commendable, until such time when a stable political and conflict-free environment exists in the country, the current challenging state of the nation's main utility supply is likely to persist for the foreseeable future.

To address the power challenge, Zain South Sudan deployed green power solutions including battery-hybrid innovations, solar systems, outdoor equipment, and connection of base station sites to the grid, and performed site-sharing deployments with other MNOs. The strategy followed by Zain is to transform the identified physical and transition risks into opportunities by responding in a way that helps reduce our operating costs with payback periods that do not exceed six years. The implementation of energy efficient solutions led to a reduction in our opex by USD 1.8m in 2023. The benefits of such initiatives will continue for at least five more years (during the life-time of the equipment that was deployed). The initiatives also helped Zain reduce its CO₂ emission by 11,106.85 metric tons in 2023.

The opportunity also refers to Zain's broader operations. We highlighted Iraq, Sudan, and South Sudan as these operations are the major beneficiaries of this opportunity due to grid availability and cost of diesel in the face of devaluation of the local currencies.

The potential financial impact comes from the implementation of energy efficient solutions on our telecom sites. This financial impact figure has two components: A saving in opex of USD 1.8m in 2023, and an estimated saving in capex of USD 3.6m, totaling USD 5.4m in savings in a single year. It is estimated that opex savings could reach USD 2.25m per year from 2025 due to some initiatives that were implemented late during the reporting year. This provides a maximum annual saving on capex and opex of USD 5.8m.

Risk Management from Climate Change Perspective

Zain's Risk Management practices have a positive impact and creates value in the below mentioned areas:

Business: Long-Term (5+ years)

Information security assessments, strict risk management policies, and robust security solutions

enhance Zain's business operations by safeguarding critical data, ensuring compliance, and minimizing disruptions. These proactive measures build trust with stakeholders, protect intellectual property, and support seamless operations, driving business continuity and growth. Additionally, by preventing breaches and mitigating risks from threat actors, Zain avoids costly incidents, legal penalties, and downtime, achieving cost optimization through reduced financial losses and efficient resource allocation. This is a long-term impact as security threats will continue to exist and evolve, meaning Zain's security posture will continue to mature.

Society: Long-Term (5+ years)

Zain's Risk Management practices create societal value by promoting a safer digital environment through comprehensive information security assessments, well-defined policies, and robust procedures. These efforts not only protect the company's data but also contribute to safeguarding customers' information, fostering trust and reliability. Through security awareness programs and sessions, Zain empowers employees and stakeholders with the knowledge to mitigate risks, reducing the impact of cyber threats beyond the organization. This proactive approach helps build a more secure community, encouraging responsible digital behavior and supporting overall societal resilience against cybercrime.

Environment: Zain's Risk Management practices takes a short-term, medium-term and long-term approach.

Short-Term – (1-3 years)

We analyze the operational risks arising due to climate change events that need to be addressed to enhance our services to remain competitive in our markets. The normal life-time of some of our assets such as diesel generators used on off-grid sites is approximately three years. Hence, we consider three years to be a

reasonable period for assessing the impact of physical risks on such assets. From a financial and strategic perspective, our short-term horizon is focused on development and achievement of revenue forecasts, cost targets and profitability targets based on existing consumer and enterprise business portfolios.

Medium-Term – (3-5 years)

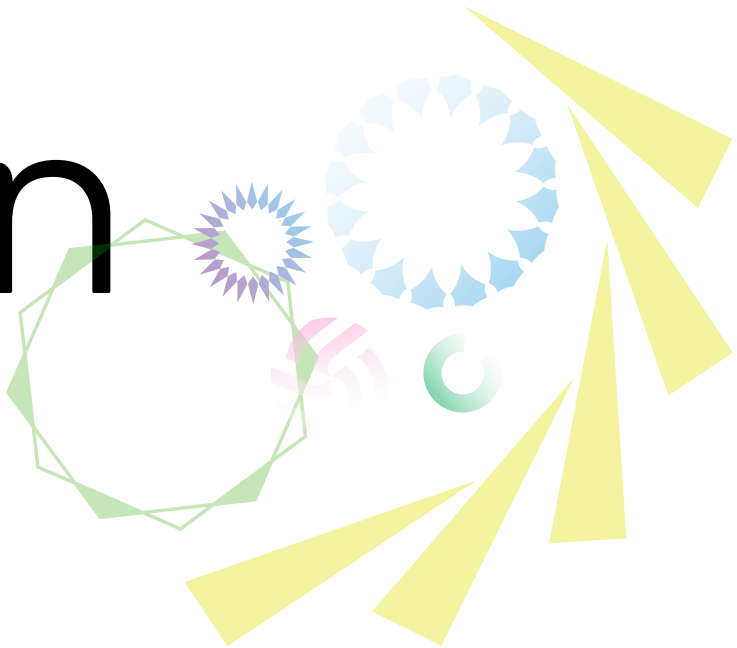
Our medium-term time horizon is aligned to our business planning process that uses a five-year horizon for the operational risks arising due to climate change events. This period is also in line with the lifetime of other assets such as deep cycling batteries, which are used to mitigate the factors associated with some of the physical and transition risks. Our five-year business plan is updated annually, while monitoring the progress of the plan from the previous year. The business plan is updated with actuals of the first year and the revised forecast for four years, and subsequently an incremental year is added.

Long-Term – (5+ years)

Our long-term business financial planning process is planned over 5 and 15 years to align with our goals for climate change initiatives. This is the timeframe that gathers a large portion of the company's assets such as the cooling systems, DC power systems, the radio systems, and other active equipment in transmission and core sections. The impact of physical risks on such assets is evaluated and mitigated to ensure that the company remains competitive in its markets of operation. From a strategic perspective, our strategic business plan entails the long-term horizon and is focused on a forecast of cashflows and revenue potential from the initiatives that we identify as part of our organization's strategy.



Human Rights





Zain recognizes the important role it plays in advocating for human rights through its core services and access to connectivity. Access provides the communities we operate in with expansive opportunities that lead to the betterment of livelihoods. The company acknowledges the role its products and services play in advancing human rights in its markets. This is considered an opportunity to generate value by continuing to position Zain’s products and services as critical to national infrastructure and identifying connectivity as a basic human right. It is important to recognize that access to connectivity continues to be a fundamental gateway to other essential rights such as access to information, freedom of expression, education, and healthcare.

Throughout the year, the region experienced extensive human rights violations due to the rise in armed conflict, the climate crisis, discrimination, and continued economic strain on the least resourced and populated communities. Issues such as unemployment and lack of quality jobs persist, affecting both the online and offline environments. Ongoing conflict coupled with increased misinformation has created hostility increasing the amount of human right abuses impacting the most vulnerable segments such as women and children. On the climate front, governments have struggled to support impacts on food and water security given rising temperatures globally.

In 2024, Zain continued to uphold the framework it established to manage and assess its human rights aspects across its operating communities:

- Governance and Policy
- Processes and Procedures
- Identification of Salient Human Rights Topics through Engagement
- Reporting and Impact

For its second consecutive year, Zain has been a member of the United Nations Global Compact (UNGC) initiative. This membership affirms the company’s adherence to the UNGC’s principles on human rights, labor standards, environmental sustainability, and anti-corruption measures in business practices.

Since 2014, Zain continues to align with the United Nations Guiding Principles on Business and Human Rights. Through this commitment, the company demonstrates how it respects human rights throughout its operations and across its value chain.

Governance and Policy

The company continued to demonstrate a solid governance model to ensure that it involves and engages with all relevant stakeholders when managing human rights. Due to the nature of the salient human rights issues identified for Zain, different stakeholders across the company are responsible for specific aspects.

Board of Directors

Provides approval on policies and procedures on the integration of human rights into business practices

Executive Management

Responsible for the implementation of the policies and procedures that prioritize human rights

Corporate Sustainability

Develops the oversight and direction on how human rights are being managed and addressed cross functionally

Human Resources

Ensures the implementation of fair and transparent labor practices for employees and fosters a safe and respectful work environment

Procurement

Responsible for implementation of Zain’s human rights policies across its supply chain through ensuring the adherence of suppliers to Zain’s human rights policy, self-assessment questionnaire and physical audits

Insurance

Provides coverage on any health and safety related incidents impacting employees

Technology

Implements technologies that respects users’ privacy, data protection and security in addition to implementing child sexual abuse blocking mechanisms

Regulatory

Ensures compliance with any local or international human rights related legislations mandated on the company

Risk

Highlights any potential risk that will impact the company in relation to human rights issues

Commercial

Embeds Zain’s Responsible Marketing Standards and Communications in all sales and marketing activities

Corporate Communications

Responsible for communicating all human rights commitments internally and externally across the company’s multiple communication channels, including the website, internal announcements, and social media. In addition, Zain embeds it’s Responsible Marketing and Communications Standards within it’s communications.

The following list includes all policies related and in line with universal and local human rights regulations that are applicable to all stakeholders across the company’s value chain:

- [Human Rights Policy Statement](#)
- [Corporate Sustainability \(CS\) Policy](#)
- [Code of Conduct](#)
- [Supplier Code of Conduct](#)
- [Climate Change Policy](#)
- [Data Protection and Privacy Policy](#)
- [Responsible Marketing and Communications Standard Policy Statement](#)

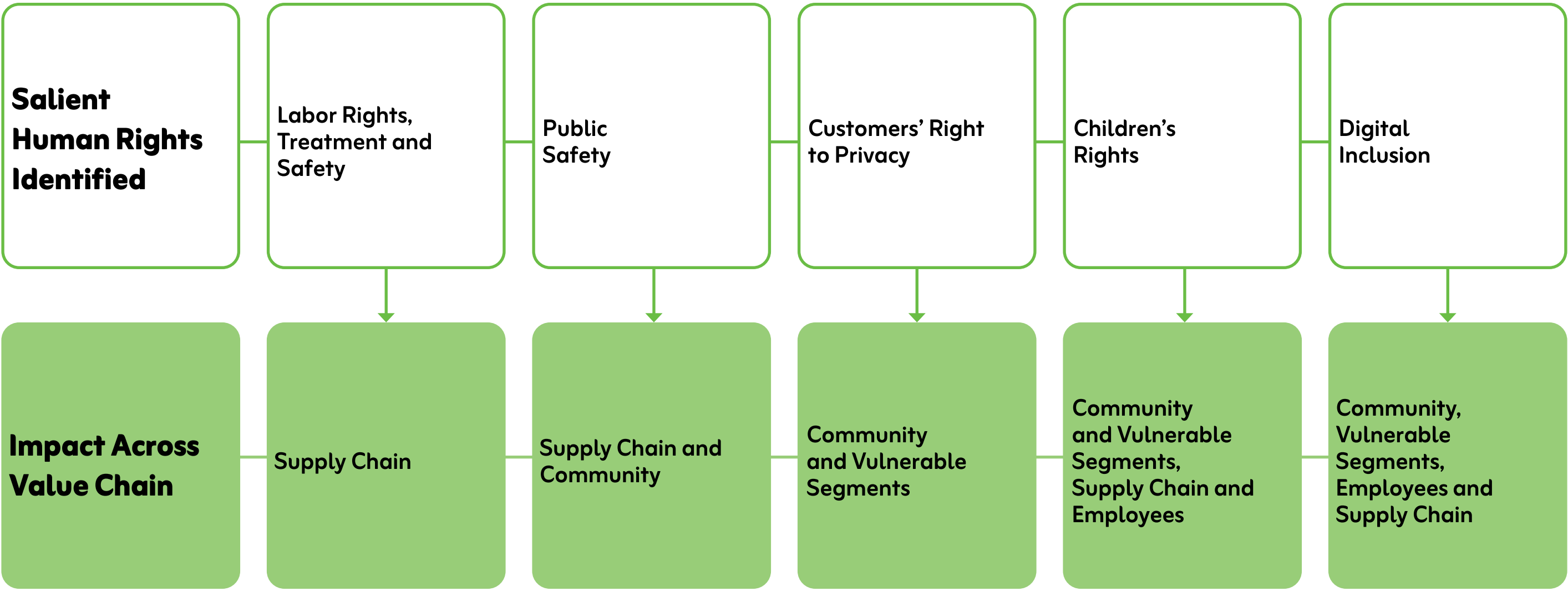
All of the company’s policies are publicly available on its website in [English](#) and [Arabic](#).



Processes and Procedures

Human rights oversight spans across Zain’s operations in Kuwait, Bahrain, Iraq, Jordan, Saudi Arabia, Sudan, and South Sudan, as well as to subsidiaries such as ZainTECH, Zain Omantel International (ZOI), and other companies under Zain’s management control.

Based on its continuous engagement with stakeholders; assessment of Zain’s operating context; community challenges and deficits; industry landscape; benchmarking exercise; and the UN Sustainable Development Goals (SDGs), the following human rights topics have been identified as the most salient for Zain:



Identification of salient human rights topics through engagement

This section provides the different components that were considered when identifying the salient human rights topics for Zain in addition to any developments that occurred in 2024:

Zain ensured that its human rights impact assessment conducted in 2023 was updated during the year and included in this year’s assessment. The company’s due diligence identified the most relevant human rights issues, primarily through comprehensive stakeholder engagement. In addition, insights were gathered from leading industry associations, data analytics platforms, benchmarking exercises, industry analysts, and ESG indices.

Zain also conducts high-level interactions within the company, namely between the Vice-Chairman and Group CEO, Chief Sustainability Officer, and other senior executives including the Board of Directors, Chief Risk Officer, Chief Human Resources Officer, Head of Legal/ Legal Counsel, and Chief Corporate Affairs and Communications Officer.

Through the company’s social media channels, Zain engages with the public on topics related to promoting the importance of child hotlines, protecting data privacy, and raising awareness on vulnerable segments that include people with disabilities. In 2024, the company expanded its children’s rights advocacy with a social media campaign, emphasizing the basic rights that should be upheld for every child. This campaign garnered 16.5 million impressions. Additionally, Zain underscores the significance of Human Rights Day by meaningfully engaging with its audience, and raising awareness on this crucial issue. Zain also engaged with regional peers to promote the adoption and implementation of child online safety initiatives by sharing best practices and how Zain navigates its context.

The company not only maintains its policies and ensures they are upheld, but also prioritizes educating the stakeholders that may be impacted, including its employees, suppliers, the public, and other relevant stakeholders.

Channels to communicate grievances are crucial for Zain. Effective mechanisms and remedies are available across its Human Rights Policy Statement, Code of Conduct, Suppliers Code of Conduct, and Environmental and Social Management Plan (ESMP). Each document includes details for impacted people to communicate their grievances to the company. This year, Zain revised its Code of Conduct and ensured it took a multifunctional approach by including Human Resources, Enterprise Risk Management, Regulatory, Technology, Legal, and Corporate Affairs and Communications. The revised version was approved by the Board of Directors in Q3 and is available on the Zain Group website.

In 2024, Zain launched its [Responsible Marketing and Communications Standard and Responsible Marketing and Communications Standard Policy Statement](#), as a result of conducting UNICEF’s MO-CRIA, Child Rights Impact Self-Assessment Toolkit for Mobile Operators, given this was identified as a gap in Zain’s commercial practices. This underscores the company’s commitment to conducting business with integrity and transparency and prioritization of protecting vulnerable populations, including individuals with disabilities, the elderly, refugees/ internally displaced persons, women, and safeguarding children’s rights.





Impact and Reporting

Zain ensures that both local and international suppliers align to responsible business practices, particularly concerning human rights. Suppliers and partners are required to adhere strictly to Zain’s Supplier Code of Conduct, Human Rights Policy Statement, and undergo a screening process before onboarding.

In 2024, the company continued to ensure that all current suppliers had signed the Human Rights Policy Statement introduced in 2020. Suppliers onboarded from 2022 must comply with all policies during registration, while those onboarded earlier will be contacted to sign and adhere to the policy. Currently, all of Zain operations ensure that their suppliers are aligned with the human rights policy, with the goal of achieving 100% alignment by 2025.

When expanding geographically or entering new revenue streams via acquisitions, Zain conducts human rights impact assessments. These assessments encompass gender equality, children's rights, accessibility for people with disabilities, inclusivity, fair and equal opportunity, and labor practices, including child and compulsory labor. This report covers all of Zain’s most pertinent human rights issues that took place during the year. During this period, there were no human rights abuses committed under Zain’s scope.

1. Labor Rights

Stakeholder Engagement

The following policies and values are publicly available on the company website:

- [Code of Conduct](#)
- [Supplier Code of Conduct](#)
- [Human Rights Policy statement](#)
- [Life at Zain](#)
- [Responsible Marketing and Communications Standard Policy Statement](#)

The company also has its internal policy - Human Resources Policy - that is communicated and available to all employees.

All of Zain’s policies undergo revision as required, to ensure alignment with the business’ and stakeholders’ evolving needs and expectations, as well as emerging best practices.

Impact on Policies

Zain provides various channels for employees to report potential violations of their labor rights or mistreatment, ensuring updates on policies and procedures are communicated internally. The company actively monitors incidents of discrimination and implements corrective actions as needed throughout its operations. Employees, suppliers, business partners, and contractors are also expected to report incidents via Zain’s whistleblowing channel at whistleblowing@zain.com.

2. Public Safety

Stakeholder Engagement

Zain ensures that its activities, including the establishment of base stations, are in line with its ESMP Guidelines, and are carried out in compliance with relevant regulatory authorities. The ESMP Guidelines were developed to minimize Zain’s potential harmful environmental aspects, protect the safety of its surrounding communities, and address negative effects of the company’s business activities. The processes in the ESMP Guidelines include reviewing environmental and social risks, notifying local communities before undertaking any installation or maintenance work, and issuing policies that address grievances from local community members. Zain’s equipment is tested regularly to ensure compliance is maintained with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) for occupational public exposure to electric and magnetic fields, and to guarantee that the public is protected and made aware of EMF zones by restricted access and appropriate signage of antenna propagation zones that exceed the ICNIRP maximum public level.

Impact on Policies

Zain maintains the policies specified in the ESMP Guidelines that safeguard against exposure to electromagnetic fields (EMF), radiation, and other potentially harmful exposures, ensuring that guidelines are aligned to net-zero ambitions and biodiversity requirements, recently revised in 2023.

3. Customer Rights to Privacy

Stakeholder Engagement

The protection of Zain customers’ personal data is communicated through the company’s annual Sustainability Report in the ‘Products & Services’ section, and through the website. Zain continues to place great emphasis on data privacy and information security across all areas of the business. In 2024, the company appointed a Head of Data at Zain Group to oversee the management of all information and data in accordance with best practices and regulatory requirements.

Impact on Policies

The company’s recently updated Data Protection and Privacy Policy covers a range of topics including how Zain collects, uses, and stores personal data and the rights of individuals to access and control their personal data.

If there are any questions or concerns about the policy please contact the below: ZainDataProtectionandPrivacy@zain.com.

4. Digital Inclusion

Stakeholder Engagement

As per the definition set by the World Benchmarking Alliance, digital inclusion is identified as enhancing universal access to digital technologies, improving digital skills, fostering trust by mitigating risk and harm, and through innovation, inclusively, and ethically. According to the World Benchmarking Alliance, Zain ranked 23rd out of 200 companies assessed and achieved the second highest score in the region.

The company ensures it tackles this topic internally and externally. Internally, it has a dedicated Inclusion, Diversity and Equity (IDE) department with specified DEI pillars consisting of: WE gender diversity initiative; WE ABLE disability inclusive program; ZY youth development program; ZAINIAC internal innovation platform; BE WELL mental health program; and REACH mentoring initiative. Through these pillars, the company embeds digital skill development across the business. Externally, the company dedicated a specific pillar to its Corporate Sustainability strategy, which addresses the digital divide. Zain has specific initiatives that aim to close this gap for women, elderly, and people with disabilities.

- [Zain’s Diversity, Equity, and Inclusion Policy](#)
- [Zain’s Corporate Sustainability Policy](#)

Impact on Policies

Zain’s IDE progress is reported in the ‘People & Purpose’ section of this report and within quarterly updates on the [Zain Group website](#). Progress on specific initiatives under the Corporate Sustainability strategy can be found on the ‘Sustainability Agenda’ section on [page 82](#).

5. Children’s Rights

Stakeholder Engagement

Zain’s Human Rights Policy Statement and Data Protection and Privacy Policy, as well as the recently developed Responsible Marketing Standard, Responsible Marketing and Communications Standard and Responsible Marketing and Communications Standard Policy Statement protects children’s rights and safety online including handling children’s information. The company dedicated one pillar of its Corporate Sustainability strategy to youth, focusing on Child Online Safety, Digital Literacy, and Youth Unemployment. In 2024, Zain continued to be a member of the newly revamped GSMA Mobile Alliance against Digital Child Sexual Exploitation initiative, which works towards taking proactive steps to fight technology-facilitated child sexual exploitation.

Zain Group was ranked as a regional leader for the second consecutive year in the final scores of Global Child Forum’s ‘The State of Children’s Rights and Business 2024’ benchmark report that was conducted in collaboration with Boston Consulting Group .

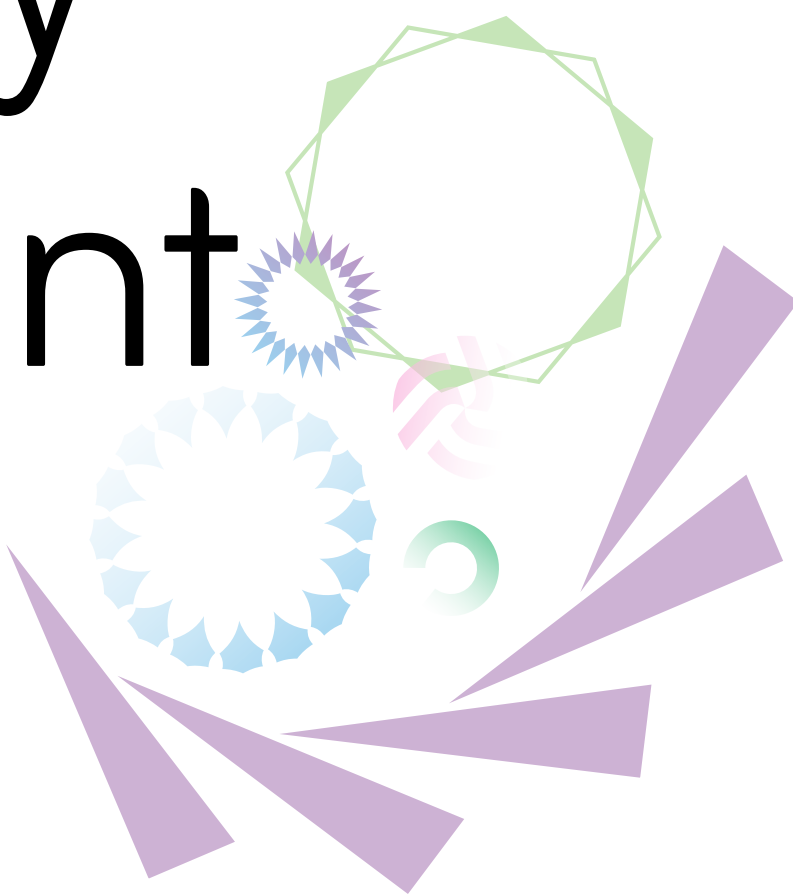
In the benchmarking rankings, Zain scored 8.4/10 overall against a sector average of 5.6/10 and a regional average of just 2.8/10. The average of all companies benchmarked stood at 4.3/10. This consistent leadership highlights Zain’s commitment and strategic alignment with international human and children’s rights standards while creating lasting value for communities and stakeholders alike.

Impact on Policies

More information on Zain’s progress in achieving the targets in this area are included in the ‘Sustainability Agenda’ section on [page 82](#).



Materiality Assessment





Zain conducts its materiality assessment on an annual basis, providing the company with the ability to identify and prioritize sustainability-related topics and the risks and opportunities for the company and its stakeholders. This helps Zain focus on sustainability topics that truly matter to its stakeholders. Zain continued to engage with internal and external stakeholders to understand their concerns and address their needs. The assessment provides the company with the necessary clarity on the areas it exerts great influence over with respect to creating, preserving, or eroding value across its landscape. Last year, Zain began to use a double materiality framework and continued to do so in 2024. Double materiality allows the company to assess both how sustainability issues affect its financial performance and how its activities influence the environment and society. This holistic approach enhances risk management and strategic decision-making by providing a more comprehensive outlook on how Zain creates value.

Determining Materiality to Zain

Understanding Zain’s Context

Zain continues to assess and identify its sustainability topics on an ongoing basis. The company conducts a comprehensive review of its operations, business partnerships, sustainability landscape, and stakeholder engagements to identify topics that impact both financial and non-financial aspects.

By integrating the strategic objectives outlined in its 4WARD strategy, industry sector focus, and employee demographics, the company gains a comprehensive understanding of its Group-wide impact across its operations.

- **Business relationships:** Based on its activities, the company established relationships with business partners that are aligned to Zain’s vision. Throughout the value chain, the company prioritizes its engagement with suppliers to mitigate risks and ensure business continuity.
- **Sustainability context:** Zain’s regional landscape gives rise to a set of unique challenges that include youth unemployment, gender inequality, climate-related disasters, infringement of human rights, biodiversity loss, lack of regulatory reform in adopting data security, data sovereignty frameworks, children’s rights, socio-political conflicts, skills mismatch, and retention of local talent.
- **Stakeholder groups:** Engaging with the company’s stakeholders is crucial in understanding their needs, concerns and how Zain is providing value from a socio-economic, environmental, and human rights perspective.



Changes in 2024

Beginning in 2024, the company implemented quarterly reporting to the Board on its materiality assessment results, focusing specifically on changes in ranking and highlighting the top-five prioritized topics. This ensures that the Board has continuous oversight on stakeholders’ concerns and priorities. In addition, the company continued to update and revise its material topics to ensure alignment with industry trends. This year the company added Outer Space Management as a new Main Issue and added the following subtopics to the Main Issues highlighted in the table below:

Main Issue	Changes conducted in 2024
Socio-economic Compliance	Added socio-economic risks as a subtopic
Modern Slavery	Name changed to <i>Human Rights</i> , which now includes modern slavery and online safety as subtopics
Mobile Communications and Health	Added public health as a subtopic



Identifying Actual and Potential Value Created

In 2024, Zain continued to utilize Datamaran, a software analytics platform that conducts its materiality assessment by monitoring current and emerging ESG-related risks. The automated analysis includes benchmarking against peers, evaluating broader ESG regulations, online news, and media sources, alongside gathering insights from stakeholder engagement surveys.

Zain utilizes Datamaran’s platform analytics and incorporates its telecom industry material topics list to ensure that emerging risks are considered in the company’s materiality assessment. The revisions undergo approval from Zain’s Chief Sustainability Officer.

A shortlist of 28 topics were compiled that are based on previous reports and upcoming trends, which included:

- Datamaran’s machine learning telco industry list
- The macro-business environment
- Benchmarking against other prominent players in the industry and region
- Inputs gathered from operational review meetings, business plan meetings, and from leadership and executive management
- Sustainability interests raised by stakeholders
- Socio-economic and political factors

Zain bases its annual Sustainability Report on the results of the materiality assessment exercise to further understand the significant issues for the company and its stakeholders.





Assess the Significance of Value Creation

Stakeholder Inclusiveness

Zain defines stakeholders using the definition provided by GRI as follows:

“Stakeholders are entities or individuals that can reasonably be expected to be significantly affected by the organization’s activities, products and services, and whose actions can reasonably be expected to affect the ability of the organization to successfully implement its strategies and achieve its objectives.”

The stakeholders involved in this process include employees, shareholders, investors, and suppliers, as well as those indirectly affected by the company’s activities such as local communities, civil society, non-governmental organizations, and vulnerable populations.

Based on this definition, Zain identifies its main stakeholders for the purposes of this report as:

Internal	External
• Board of Directors • Executive Management • Employees	• Regulators • Shareholders • Suppliers • Business Partners • Financial Institutions • General Public • Customers • Media • NGOs

Other than engaging with stakeholders on the materiality assessment analysis, Zain also frequently carries out additional stakeholder engagement activities throughout the course of the year, which enables the organization to address the needs and expectations of its stakeholders. Related engagement activities include:

1. Corporate Sustainability (CS) Social Media Outreach: The company continued to engage with Zain’s internal and external stakeholders to foster a sustainability mindset. Zain encourages its audiences to provide feedback on the highlighted issues through social media engagement tools such as polls, surveys, and questions highlighted in the posts’ caption. Some topics covered through social media included climate change, biodiversity, people with disabilities, children’s rights, green skills, elderly community, and diversity, equity, & inclusion.

2. Internal forums: These activities are designed to engage both the Group and operating companies, and its subsidiaries to measure priorities, share best practices, and discuss issues related to their specific business areas. In 2024, the following function-specific forums were conducted: Strategy, Dizlee (Zain Group API Platform), Risk Management, Human Resources, and Technology.

3. Stakeholder engagement process through various corporate functions: Zain ensures it conducts frequent engagement sessions with stakeholders through analyst, investor and shareholder meetings, frequent communication with regulatory bodies, meetings with partners, customer polling, and other engagement activities related to each relevant function. For the second year in a row, ZainTECH, Zain Group’s digital transformation arm for governments and enterprises, participated in GITEX, a global tech exhibition that takes place in Dubai annually. ZainTECH along with Zain Saudi Arabia participated in LEAP, the annual tech event founded by the Kingdom’s Ministry of Communications and Information Technology, the

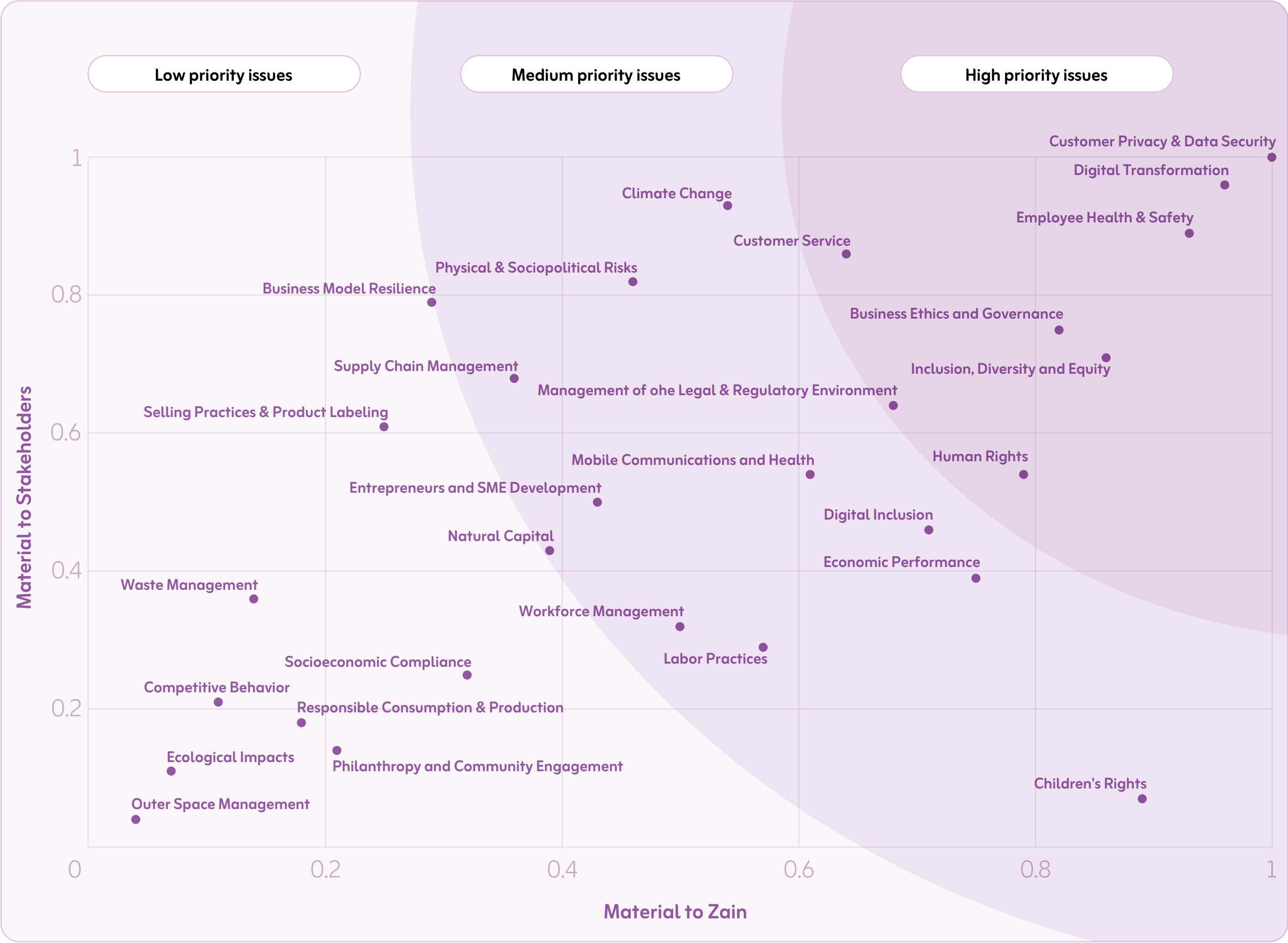
Saudi Federation for Cybersecurity, Programming and Drones, and Tahaluf.

The following table showcases the changes that have been made and provides a year-on-year comparison of the rankings based on the results from Datamaran and survey responses.

Material Topics	Ranking Order 2024	Ranking Order 2023
Customer Privacy & Data Security	1	1
Digital Transformation	2	2
Climate Change	3	5
Employee Health & Safety	4	3
Customer Service	5	4
Physical & Sociopolitical Risks	6	22
Business Model Resilience	7	8
Inclusion, Diversity and Equity	8	9
Business Ethics and Governance	9	7
Supply Chain Management	10	14
Management of the Legal & Regulatory Environment	11	10
Selling Practices & Product Labeling	12	19
Human Rights	14	15
Mobile Communications and Health	14	6
Entrepreneurs and SME Development	15	23
Digital Inclusion	16	12
Natural Capital	17	27
Economic Performance	18	13
Waste Management	19	18
Workforce Management	20	11
Labor Practices	21	17
Socioeconomic Compliance	22	21
Competitive Behavior	23	16
Responsible Consumption & Production	24	20
Philanthropy and Community Engagement	25	24
Ecological Impacts	26	26
Children's Rights	27	25
Outer Space Management	28	-



Zain’s Materiality Matrix



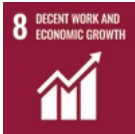
Zain’s Double Materiality Matrix

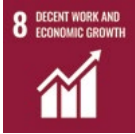
	Financial score	Impact score
Customer Privacy & Data Security	0.94	0.88
Digital Transformation	0.57	0.82
Employee Health & Safety	0.50	0.70
Inclusion, Diversity and Equity	0.59	0.62
Business Ethics and Governance	0.64	0.54
Customer Service	0.62	0.56
Climate Change	0.67	0.77
Management of the Legal & Regulatory Environment	0.76	0.31
Human Rights	0.54	0.66
Physical & Sociopolitical Risks	0.59	0.51
Digital Inclusion	0.44	0.69
Mobile Communications and Health	0.34	0.63
Economic Performance	0.63	0.42
Supply Chain Management	0.42	0.50
Business Model Resilience	0.51	0.46
Entrepreneurs and SME Development	0.30	0.67
Natural Capital	0.43	0.56
Labor Practices	0.45	0.44
Workforce Management	0.37	0.50
Selling Practices & Product Labeling	0.44	0.31
Socioeconomic Compliance	0.44	0.46
Children's Rights	0.37	0.25
Waste Management	0.49	0.33
Responsible Consumption & Production	0.43	0.22
Philanthropy and Community Engagement	0.15	0.49
Competitive Behavior	0.35	0.22
Ecological Impacts	0.22	0.24
Outer Space Management	0.05	0.11



Disclosures on Material Topics

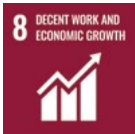
The company continuously assesses and addresses value creation across its activities to identify its ESG and human rights impacts. This enables Zain to embed how it creates, preserves, or erodes value in its decision-making priorities.

Material Topics	Definition	Overview of social, economic, environmental, and human rights aspects	High, Medium, Low	SDGs
Customer Privacy & Data security	The aspect of information technology that deals with the protection of private corporate information, critical information systems, and networks from security breaches.	Enhancing Zain’s data privacy protocols in line with best practices and complying with local laws and regulations, improves the company's data management practices and creates robust digital infrastructures. This approach helps safeguard stakeholders from issues such as unauthorized account charges, privacy breaches, and identity theft.	High	 SDG 16: Peace, Justice, and Strong Institutions (Promote effective, accountable, and transparent institutions)
Customer Service	The dynamics of customer expectations that affect satisfaction, loyalty, and brand reputation, and the mechanisms to ensure consumers are treated fairly and honestly during commercial transactions.	Offering high-quality and inclusive products and services enhances and supports Zain's customer needs. Ensuring that Zains’ customers have reliable connectivity reduces information gaps, boosts economic activity, and promotes greater efficiencies. The company also monitors its Net Promoter Scores (NPS) and maintains open communication channels throughout its operations to address and meet customer requirements effectively.	High	 SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth)
Employee Health & Safety	A company's safety performance and the mechanisms it has in place to maintain a safe and healthy workplace environment. It captures protocols, training, work arrangements, and the physical and mental working conditions to which employees are exposed to.	Neglecting to maintain a safe and healthy work environment can result in fatalities, severe injuries, and illnesses, which can impact employees' quality of life and, in turn, impact business productivity, and reputation. Zain remains committed to safeguarding employee health and safety, addressing both physical and mental well-being by evaluating risks and managing work-related incidents. Initiatives include facilitating remote work, offering comprehensive insurance packages, and implementing various programs under the BE WELL wellness initiative, which underscores the importance of mental health, especially during regional conflicts and socio-political turmoil.	High	 SDG 3: Good Health and Well-being (Ensure healthy lives and promote well-being for all at all ages)
Digital Transformation	The development and use of advanced technologies and digital innovations to generate new business processes and improve customers’ and other stakeholders' experiences	Digital transformation profoundly affects a variety of other industries, and Zain's 4WARD strategy seeks to advance the digital ecosystem by leveraging its core services, such as roaming and wholesale. Additionally, the strategy focuses on expanding into other sectors through its digital transformation and investment arm, addressing fields like fintech, ventures, application programming interfaces (APIs), and esports.	High	 SDG 9: Industry, Innovation, and Infrastructure (Build resilient infrastructure, promote inclusive and sustainable industrialization, and foster innovation)

Material Topics	Definition	Overview of social, economic, environmental, and human rights aspects	High, Medium, Low	SDGs
Business Ethics and Governance	The moral code of conduct and guiding principles to the strategic and operational management of a business. It captures the management of risks and opportunities associated with ethical considerations, lawful behavior, and compliance practices.	The company prioritizes its integrity and ethics with all stakeholders to foster trust. By cultivating its various relationships, Zain can effectively and accurately address stakeholder concerns. A well-established governance model enables management to monitor and manage the organization's value. Ensuring online safety is essential in this context, as it safeguards customer data and upholds trust and transparency.	High	 SDG 16: Peace, Justice, and Strong Institutions (Promote effective, accountable, and transparent institutions)
Climate Change	Managing climate-related risks and opportunities from actual or potential physical and transition impacts. It also includes the direct and indirect emissions of greenhouse gases (GHGs) and emission reduction targets to limit individual company contributions to global warming.	The company remains committed to managing its emissions throughout its operations in line with best practice and international standard requirements. Climate change motivates Zain to adapt and manage its risks while actively implementing green solutions to assist other sectors in their efforts. Going beyond mere aspirations, Zain is focused on taking actionable steps, leveraging its influence to advocate for policy reforms, introduce energy efficient solutions, and raise awareness to combat climate change.	Medium	 SDG 13: Climate Action (Take urgent action to combat climate change and its impacts)
Workforce Management	This issue refers to the process of ensuring the workforce is functioning at its most productive levels and copes with organizational changes. It captures employee recruitment, retention, and development practices.	With around 11,011 employees in eight markets and across all subsidiaries, Zain influences its workforce through its policies, practices, recruitment efforts, employee engagement and retention strategies, and skill development initiatives.	Medium	 SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth)
Inclusion, Diversity, and Equity	Processes and mechanisms a company has to grow and maintain diversity in the workforce and ensure equal opportunities and treatment for all employees.	Zain actively promotes inclusion, diversity, and equity (IDE) to enhance social equity, drive economic growth, and attract a wider range of potential talent. By developing IDE competencies, nurturing employees’ skillsets, ensuring fair and equal remuneration, implementing strategic Group-wide initiatives, and raising awareness, Zain cultivates a more diverse and inclusive culture.	Medium	 SDG 10: Reduced Inequalities (Reduce inequality within and among countries)
Digital Inclusion	The company's ability to ensure all individuals and population groups can access its products and services without discrimination. It includes the management of universal needs, affordability, and accessibility.	Addressing the digital divide and ensuring inclusivity brings a range of socio-economic advantages. The company investigates the needs of marginalized communities and creates opportunities that address their concerns. Zain focuses on catering towards groups such as children and youth, women, the elderly, and individuals with disabilities, setting specific goals by providing inclusive products and services. In addition, the company also establishes programs that address the digital barriers faced by vulnerable segments.	Medium	 SDG 9: Industry, Innovation, and Infrastructure (Build resilient infrastructure, promote inclusive and sustainable industrialization, and foster innovation)

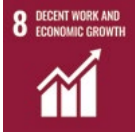


Material Topics	Definition	Overview of social, economic, environmental, and human rights aspects	High, Medium, Low	SDGs
Business Model Resilience	Identifying and managing risks and opportunities connected to social, environmental, and economic challenges into business model planning. It focuses on how companies respond and adapt to these changes to carry on their activity, grow and create value for shareholders, and society in the long- term.	Zain remains committed to integrating business continuity into its risk management policies, practices, and processes. External circumstances such as natural and humanitarian disasters and geopolitical instability emphasize the need to systematically embed resilience mechanisms into the company's operations. This highlights the company's efforts in ensuring it optimizes long-term value creation while considering the shift in global demographic trends.	Medium	 SDG 9: Industry, Innovation, and Infrastructure (Build resilient infrastructure, promote inclusive and sustainable industrialization, and foster innovation)
Mobile Communications and Health	Major risks to public health, including exposure to radio signals and EMF from mobile network antennas and mobile devices, spread of infectious diseases and eventual pandemics, the availability of vaccinations and the anti-vaccine movement, and potentially deadly non-communicable diseases.	The GSMA states that exposure to low-level radio signals from mobile communications has not been linked to health risks. Zain adheres to official guidelines and upholds the policies and practices outlined in its Environmental and Social Management Plan (ESMP) to protect communities from electromagnetic fields (EMF). Additionally, public health considerations are included in the assessment to address all aspects of health related to this issue.	Medium	 SDG 3: Good Health and Well-being (Ensure healthy lives and promote well-being for all at all ages)
Supply Chain Management	The establishment of commitments and policies designed to trace, screen, monitor, and follow up with supplier performance against one or more ESG dimensions and manage supply chain risks concerning supply shortages or disruptions. It captures strategies to maintain transparent communication and support between a company and its suppliers.	Societies with advanced supply chain management systems are significantly impacted as they create employment opportunities and often provide access to healthcare for many. However, supply chains also face increased risks of human rights violations, such as labor abuses, child labor, corruption, and health and safety issues. Zain is dedicated to enhancing and scaling its mechanisms and processes across all markets to address human rights concerns and protect biodiversity throughout its entire value chain. In addition, Zain also ensures it considers how its supply chain manages materials/waste, has ethical policies in place, and how its suppliers align to the company's policies and values.	Medium	 SDG 12: Responsible Consumption and Production (Ensure sustainable consumption and production patterns)
Labor practices	Employment practices related to internal and external workforces throughout the value chain, compliance with regulatory regimes, and internationally accepted labor standards in the workplace. It captures minimum labor rights, employee benefits, and fair compensation.	Adhering to local and international labor laws has significant economic implications. By following these practices, the company can shape employment standards not only within its own workforce but also across its supply chain, minimizing the risk of abuse or discrimination. Zain positively impacts this area by safeguarding the rights of its employees, workers, and those within its supply chain. The company also proactively ensures it follows best practice through its employee incentives, benefit plans and collective bargaining rights.	Medium	 SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth)

Material Topics	Definition	Overview of social, economic, environmental, and human rights aspects	High, Medium, Low	SDGs
Economic Performance	Providing a transparent understanding of the strategy and business through frequent engagement by hosting forums and meetings, issuing periodic financial reports, disclosing the company's financial performance, and engaging in earnings conference calls.	By meeting its economic goals and objectives, the company generates and allocates wealth to its stakeholders. This economic value enables Zain to highlight critical investment opportunities in areas such as infrastructure, assets, and its workforce.	Medium	 SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth)
Management of the Legal and Regulatory Environment	Company's regulatory compliance strategy and how it engages and aligns itself with regulators to make public and corporate interests compatible. It captures corporate compliance management, lobbying, and government relations, as well as responsible tax planning.	Ensuring compliance with national and international laws, such as data protection and spectrum licenses and regulations, while adapting to changes in legislation. It also requires proactive engagement with regulatory bodies and stakeholders to address potential issues and influence policy reform on various topics including climate change and children's rights.	Medium	 SDG 16: Peace, Justice, and Strong Institutions (Promote effective, accountable, and transparent institutions)
Competitive Behavior	This issue refers to practices that prevent or restrict free trade or competition between commercial actors in a market, including anti-competitive behavior and protectionism. It also captures protection and infringement of intellectual property rights.	Different aspects play a role in maintaining healthy marketplaces, such as promoting fair competition, protecting, and not infringing on intellectual property, and ensuring equal access to market opportunities. This aspect is also reliant on governmental policies and international fair-trade regulations.	Medium	 SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth)
Human Rights	Committed to the principles of the Universal Declaration for Human Rights, the Core Conventions for the International Labor Organization, and the United Nations' Guiding Principles on Business and Human Rights Reporting. Committed to investigating any concerns and if we discover any adverse human rights impacts, we will act appropriately without delay and prioritize the right to freedom of opinion and expression.	Modern slavery, including forced labor, has increased with migrant workers being the most at risk. Strengthening and enforcing laws, regulations, and inspections is crucial for tackling modern slavery. Operating across eightmarkets and managing diverse suppliers, Zain seeks to broaden its impact and uphold its social and environmental practices and values throughout its supply chain.	Low	 SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth)



Material Topics	Definition	Overview of social, economic, environmental, and human rights aspects	High, Medium, Low	SDGs
Socioeconomic Compliance	Assessing regulatory trends on environmental, social, and governance (ESG) indicators to ensure alignment and disclosure, alignment to international best practices and embedding a whistle-blowing policy to report and mitigate any unethical actions internally.	Ensuring compliance with all social and economic laws and regulations helps protect the communities in which the company operates. The company also ensures its non-financial reporting is audited by a third-party organization to ensure the highest level of accuracy in its ESG disclosures.	Low	 SDG 16: Peace, Justice, and Strong Institutions (Promote effective, accountable, and transparent institutions)
Children's Rights	Uphold and protect the rights of the child as relates to anticipating, preventing or responding to any form of violence, exploitation, abuse or practices that might be harmful to a child's physical and mental development and integrity. In addition, promoting children's growth, wellbeing and a safer and more secure use of Internet-based services and associated technologies.	Zain is committed to safeguarding children across its operations. This focus aligns with Zain's dedication to responsible business practices that safeguard children's rights, particularly in digital spaces. Zain integrates children's rights into its strategies, partnerships, and community initiatives, demonstrating a proactive approach to addressing this critical issue.	Low	 SDG 16: Peace, Justice, and Strong Institutions (Promote effective, accountable, and transparent institutions)
Responsible Consumption and Production	The company's ability to promote sustainable consumption and production patterns.	Zain ensures that it follows specific guidelines under its Environmental and Social Management Plan to promote sustainable consumption and production. This refers to procedures set in place to ensure product safety and service quality for the public.	Low	 SDG 12: Responsible Consumption and Production (Ensure sustainable consumption and production patterns)
Physical and Sociopolitical Risks	Challenges due to the changes in society, politics, and people due to an event or general trend and natural or human-induced disasters.	The company ensures it has proper and robust risk management in place to address any changes that occur to the business or society due to any external event that includes geopolitical conflicts or physical disasters.	Low	 SDG 16: Peace, Justice, and Strong Institutions (Promote effective, accountable, and transparent institutions)

Material Topics	Definition	Overview of social, economic, environmental, and human rights aspects	High, Medium, Low	SDGs
Selling Practices and Product Labeling	Requirements, standards, certifications, and established practices regarding the information presented to consumers when advertising and selling goods and services. In addition, refers to the social challenges related to the failure to provide transparent, accurate, and complete information.	The products and services sold by Zain have all the needed certification, labeling and information as per regulatory requirements and are in line with best practices. The company's Responsible Marketing and Communications Standards also ensures transparent communication, ethical advertising, embrace inclusive marketing, parental and guardian consent and control, responsible use of digital channels, and purpose driven partnerships and collaboration.	Low	 SDG 12: Responsible Consumption and Production (Ensure sustainable consumption and production patterns)
Waste Management	Gaseous, liquid, and solid substances used or disposed of in business operations or present in products that threaten human health or the environment. Captures the generation, treatment, recovery, recycling, and reduction measures of hazardous and non-hazardous waste and the handling, storage, and application of hazardous material.	The company takes a proactive approach to managing waste throughout its operational infrastructure, its waste management compliance framework as well as in compliance with regulations and international best practices.	Low	 SDG 12: Responsible Consumption and Production (Ensure sustainable consumption and production patterns)
Entrepreneurs & SME Development	Continuous engagement with the startup community through Zain Ventures, B2B, and community institutions to address their requirements, while fostering the entrepreneurship ecosystem.	The MENA region has the highest youth bulge and youth unemployment rate worldwide. To address these challenges, the company aims to build resilience amongst its youth in its communities by creating program, workshops and developing hackathons and entrepreneurship opportunities across the board.	Low	 SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth)
Natural Capital	Stock of capital derived from biological diversity and ecosystems, as well as natural resources.	The construction and operational activities of telecommunication-related infrastructure can impact nature and biodiversity and supply chain by disrupting local habitats and potentially affecting wildlife. To mitigate these effects, Zain has strategies and processes in place that are highlighted in the company's ESMP guidelines to minimize environmental disruption and enhance biodiversity protection, such as site selection and habitat restoration initiatives.	Low	 SDG 15: Life on Land (Protect, restore, and promote sustainable use of terrestrial ecosystems, manage forests sustainably, combat desertification, and halt and reverse land degradation and halt biodiversity loss)



Material Topics	Definition	Overview of social, economic, environmental, and human rights aspects	High, Medium, Low	SDGs
Philanthropy and Community Engagement	Refers to the contribution to other organizations and communities through funds, volunteering efforts, and in-kind products or services. It also includes assistance given to people in immediate distress during and after emergencies and disasters, and engagement with indigenous people in reference to the land, workplace, and societal contexts.	Since its inception, Zain has contributed to various philanthropic efforts throughout its operating markets. The company either supports through funds, volunteering efforts or in-kind products and services, especially in crises response.	Low	 SDG 17: Partnerships for the Goals (Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development)
Ecological Impacts	Contamination of natural resources due to harmful substances, excessive use or exploitation, and general corporate operational impacts that affect the protection of land, forests, and biodiversity resources, and the measures in place to remediate them.	Across Zain's operational activities, the company monitors and tracks its impact on natural resources including non-greenhouse gas emissions, land use under base station construction, and pollution.	Low	 SDG 15: Life on Land (Protect, restore, and promote sustainable use of terrestrial ecosystems, manage forests sustainably, combat desertification, and halt and reverse land degradation and halt biodiversity loss)
Outer Space Management	Refers to the processes and systems to control and regulate human activities in outer space. It includes the management of space traffic and low earth orbit, the mitigation of space debris, the prevention of collisions, and the minimization of the impacts of space weather.	As telecommunications technology continues to evolve, satellite networks are becoming crucial for expanding connectivity, especially in underserved and remote regions. As Zain considers future growth and innovation in connectivity, addressing outer space management aligns with a broader vision of Meaningful Connectivity.	Low	 SDG 16: Peace, Justice, and Strong Institutions (Promote effective, accountable, and transparent institutions)

Zain’s Top Five Material Topics and their Implication on Value Creation

1. Customer Privacy and Data Security

The protection and privacy of personally identifiable information (PII) entrusted to Zain by customers, clients, employees, suppliers, stakeholders, and partners is of utmost importance to the organization. The company is dedicated to safeguarding and respecting the privacy of all individuals who interact with the company, ensuring secure and transparent practices in compliance with relevant legislation. Zain’s Privacy Policy outlines the principles and procedures for collecting, processing, storing, and disclosing personal data in accordance with applicable laws and regulations.

Throughout the year, the company undertook various activities to ensure it not only complies with legislation and regulations but also proactively adheres to best practices in safeguarding stakeholders' data.

Implication on Value Creation:

- Effective data privacy practices build trust and loyalty among stakeholders leading to higher retention rates.
- Adhering to customer privacy and data security regulations helps the company avoid data breaches, fines, or legal issues.
- Ensuring robust data security practices showcases the company’s competitiveness and differentiates it from other players in the industry.

2. Digital Transformation

Zain acknowledges the critical role of advancing digital transformation, understanding that its position in this area will create opportunities for its own and other industries to benefit and evolve. Through a more focused approach, Zain is strategically offering advanced technological solutions as well as organizing its Data Governance and Management guidelines across its subsidiaries. In addition, the company is harnessing the potential of artificial intelligence (AI) to drive its digital transformation journey through its partnership with Huawei on establishing an AI Center of Excellence.

Implication on Value Creation:

- Through digital transformation, Zain can streamline processes through automation and data analytics, increasing operational efficiencies and productivity.
- For Zain, digital transformation facilitates the development of new streams and business models outside of the core products and services.
- The negative effect of increased digitization is the elevated risk of cybersecurity threats and data breaches.



3. Customer Service

Customer service for Zain is crucial in delivering quality user experience and ensuring customers' needs are continuously being met. In 2024, Zain launched "UNITY", a company-wide transformation program that aims to embed purpose and customer experience into the company's DNA by prioritizing a human-centric approach. Zain has always embedded the customer at the heart of delivering its products and services, however in a more data centric world, the company is ensuring that it adapts and formalizes Zain's customer experience activities across every function. UNITY is as a response to feedback received from the Chief Commercial Officers across the Group.

Implication on Value Creation:

- Improved customer experience promotes customer stickiness and loyalty, even encouraging the add addition of services or upgrade of plans and bundles.
- Effective customer services can reduce the frequency of customer complaints leading to improved operational efficiencies.

4. Employee Health and Safety

Zain is committed to operating with ethical and responsible standards and ensuring the health, safety, and well-being of all the company's employees across its operating companies, subsidiaries, companies under management control, the company's value chain, and our various communities.

The company's health and safety protocols extend across its facilities, network sites, suppliers, and communities by adhering to relevant health and safety rules and regulations and implementing company programs to ensure employee well-being.

Implication on Value Creation:

- Enhanced employee productivity and retention leads to a more positive work environment, efficient operations, improved job satisfaction and retention of skilled employees.
- Improved health, safety and well-being will lead to reduced healthcare and compensation care costs due to decreased workplace injuries, fatalities, and incidences.
- Failure to adhere to health and safety standards can lead to legal penalties, fines, and potential damage to the company's reputation.

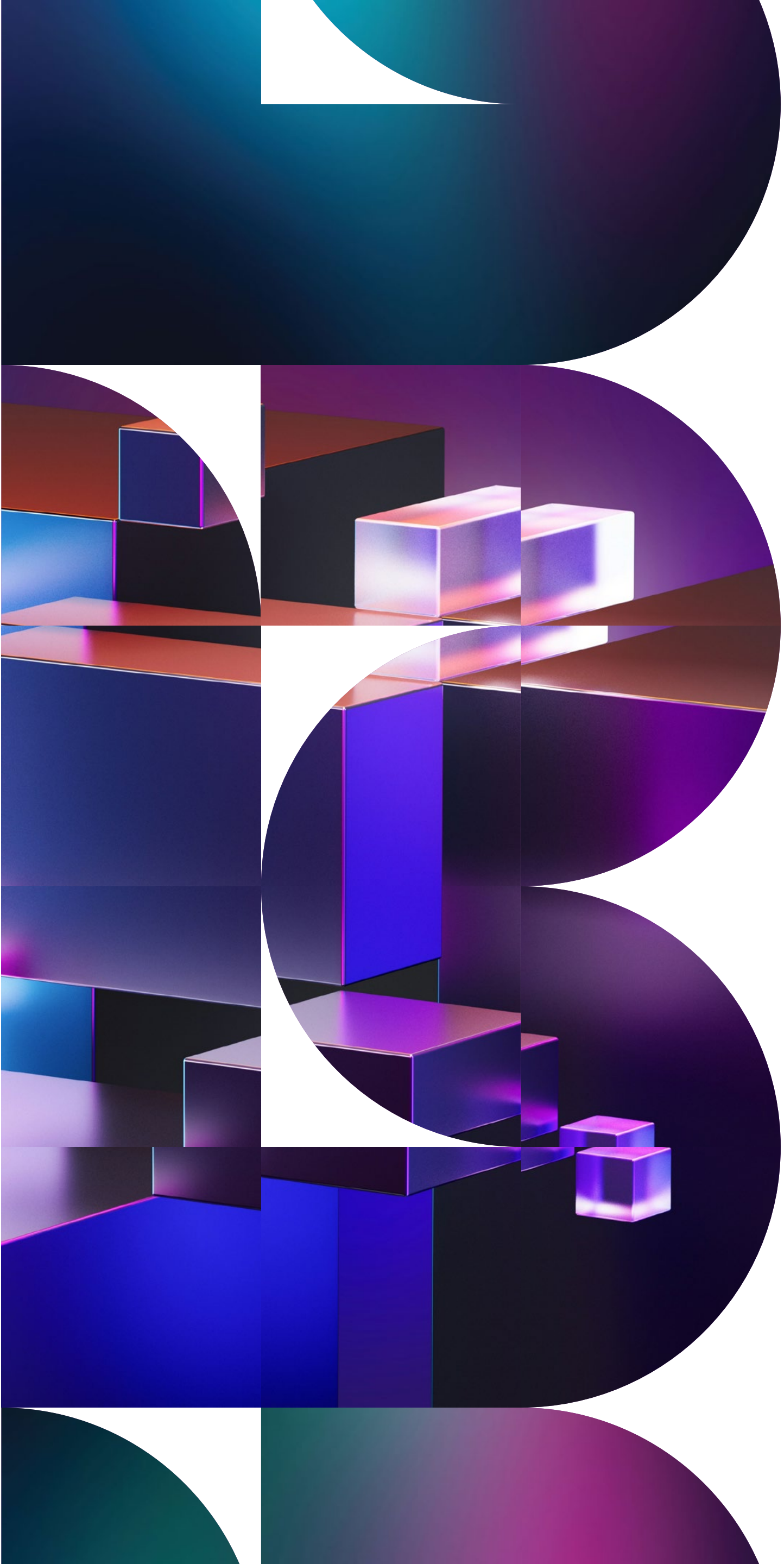
5. Climate Change

Zain recognizes the significance of climate change and the associated risks. The company is committed to reducing its carbon footprint, mitigating climate-related risks, and identifying opportunities to conserve energy, water, and biodiversity. Zain conducts a comprehensive stakeholder engagement process on an ongoing basis to influence policymakers and governmental entities, ensuring compliance with all climate-related regulations in its markets.

Implication on Value Creation:

- Integration of climate change risk assessments across Zain's strategic objectives ensures that the company can mitigate any climate-related impacts.
- Investing in energy efficient solutions and renewable energy can lead to significant cost savings.
- Conserving natural resources such as water, preserving biodiversity, and disposing of waste efficiently helps ensure that the company remains compliant with legal and regulatory requirements, avoiding potential fines and regulatory issues.





Regulatory Context





Zain Bahrain

Challenges

Spectrum Award/Auction in 700 MHz, 1400 MHz, 2300 MHz, 2500 MHz, and 3800 MHz bands for IMT

Zain’s Response

- The Telecommunications Regulatory Authority (TRA) has granted 840 MHz of spectrum, which mobile network operators (MNOs) have deployed to provide 2G/4G/5G services (3G services have been sunsetted). There is no urgent requirement for spectrum in the market. MNOs have so far lobbied for the award to be delayed or, if the Government mandates moving forward with a spectrum grant, for this to be done on a managed assignment basis. The Government and the TRA’s final position are still being awaited.

Fiber Expropriation – preparing to negotiate with Bahrain Network (BNET) on fiber transfer

- Following the TRA's unfavourable decision on a Network-Right-of-Use Product offered by BNET and the subsequent commencement of arbitration proceedings, Zain was able to reach a settlement agreement with the TRA, secure the TRA's subsequent decision, and secure BNET’s commitment to a replacement product. Zain has since signed an Asset Transfer Agreement (ATA) to transfer its fiber network to BNET in line with legislation.

Face validation (against photo on ID)

- The TRA issued a specification document allowing the use of facial recognition in SIM registration. Facial recognition registration became mandated for non-residents in Bahrain in August 2024. Zain Bahrain ensured the compliance with this obligation.

Zain Iraq

Challenges

Acquiring 2600 MHz Spectrum:

Today, Iraq has the least spectrum granted for IMT services. Iraq has awarded 304 MHz for IMT services (FDD and TDD bands) compared to over 840 – 2545 MHz of spectrum available in neighbouring countries. The limited bandwidth availability has a consequential impact on data throughput and service quality. There is a critical need to grant additional spectrum in the 2600 MHz band to alleviate congestion.

900 MHz/2100 MHz interference:

Zain has reported the interference during the shifting process of the 900 MHz band Refarming. (This process involves shifting the 900 MHz band to a different frequency, which can sometimes cause temporary interference with other services operating on nearby frequencies).

Group Regulatory Compliance:

Compliance is an important aspect of any organization, irrespective of the industry as it ensures the organization avoids penalties or reputational damage.

Zain’s Response

- Throughout the year, Zain has engaged in active discussions with the CMC Board of Commissioners and CMC Executive Management outlining reasons for the additional spectrum. The GSMA, an industry body representing over 1200 mobile ecosystem players, has also been engaged with CMC in a series of workshops, which are combined with advocacy reports and papers detailing the critical benefits of granting additional spectrum and approaches to spectrum pricing. Consequently, CMC has made a favourable decision to reserve 40 MHz in the 2600 MHz band for each operator. Further steps are now anticipated in respect of spectrum pricing.

- Mobile System International (MSI) is a global provider of mobile communication solutions, and has been engaged for one month.
- The engagement involves supporting Zain and Ooredoo.
- The support is for a 4-month measurement campaign, and is being conducted across five cities.
- The objective is to identify sources of interference and ensure compliance with spectrum frequency allocation as it is crucial for achieving a sustainable and thriving digital ecosystem. This will ensure that this valuable resource is used efficiently, equitably, and responsibly, benefiting both current and future generations.

- Sustenance Phase commenced in May 2024 to ensure:
 - › Maintenance of Regulatory Compliance Universe.
 - › Management Reporting.
 - › ISO 37301 Readiness Assessment.
- Group Regulatory Compliance Program (RCP) Team is engaging with all divisions in Zain Iraq to provide evidence of compliance with all regulations.



Zain Jordan

Challenges

Zain Challenges New Fiber-to-the-Home (FTTH) Infrastructure Fees

Zain’s Response

- The Ministry of Local Administration has imposed fees on FTTH infrastructure, including digging, poles, cabinets, and active lines.
- Zain has taken legal action against these new regulations, filing a case in court.
- Zain believes the fees are unfair or detrimental to the expansion of FTTH broadband services.

Telecommunications Regulatory Commission (TRC) Approves Technology Neutrality for Zain, Enabling 5G Expansion

- TRC grants Zain permission to implement technology neutrality across its frequencies:
 - › This enables Zain to operate 5G services on various frequency bands.
 - › Decision facilitates wider 5G coverage and enhanced network capabilities for Zain.
 - › Represents a significant step in advancing 5G deployment in the region.

Group Regulatory Compliance:
Compliance is an important aspect of any organization, irrespective of the industry as it ensures the organization can avoid penalties or reputational damage.

- Zain took steps to introduce its Regulatory Compliance Program in 2024 in Jordan to ensure compliance with laws, regulations, and other instruments issued by the National Regulatory Authority.

Zain Kuwait

Challenges

Spectrum Award in 2300/2600 MHz band

Zain’s Response

- CITRA awarded the 2300/2600 MHz to the three MNOs as per normal allocation process, however, Zain Kuwait has been awarded 100 MHz in the upper band of 2.6GHz.
- The new spectrum will help improve 5G QoS.
- Zain Kuwait paid the acquisition fee of KWD 2 million and the annual fee is set at KWD 1million.

3G Sunset

- 3G shutdown is expected by Q4 2024 and by 2027 for 2G. The requested data on 2G and 3G handset users has been submitted to CITRA, complying with CITRA’s 3G services shutdown process decision (Final 3G shutdown deadline is June 2025).
- Since 3G requires more power compared to 2G and 4G, efforts are being made to optimize the network, reducing energy consumption, and minimizing the environmental impact of 3G infrastructure. Although 2G and 4G services still have environmental impacts, technological advancements and network optimizations have made them more energy-efficient than 3G.

Tower and Sites Regulation

- Increase of rental fees by the Government on spaces are negatively impacting the operation.
- Ongoing lobbying with MoF and Municipality.

Telecom Tower Regulation

- Current regulation require MNOs to not have telecom towers 20 meters within any residential building, including schools and places of worship.
- This has the potential to hinder network rollout and increase OPEX and CAPEX related to compliance with the new regulation.
- CITRA requested MNOs to establish a task force to explore alternative solutions for the 20 meter distance.

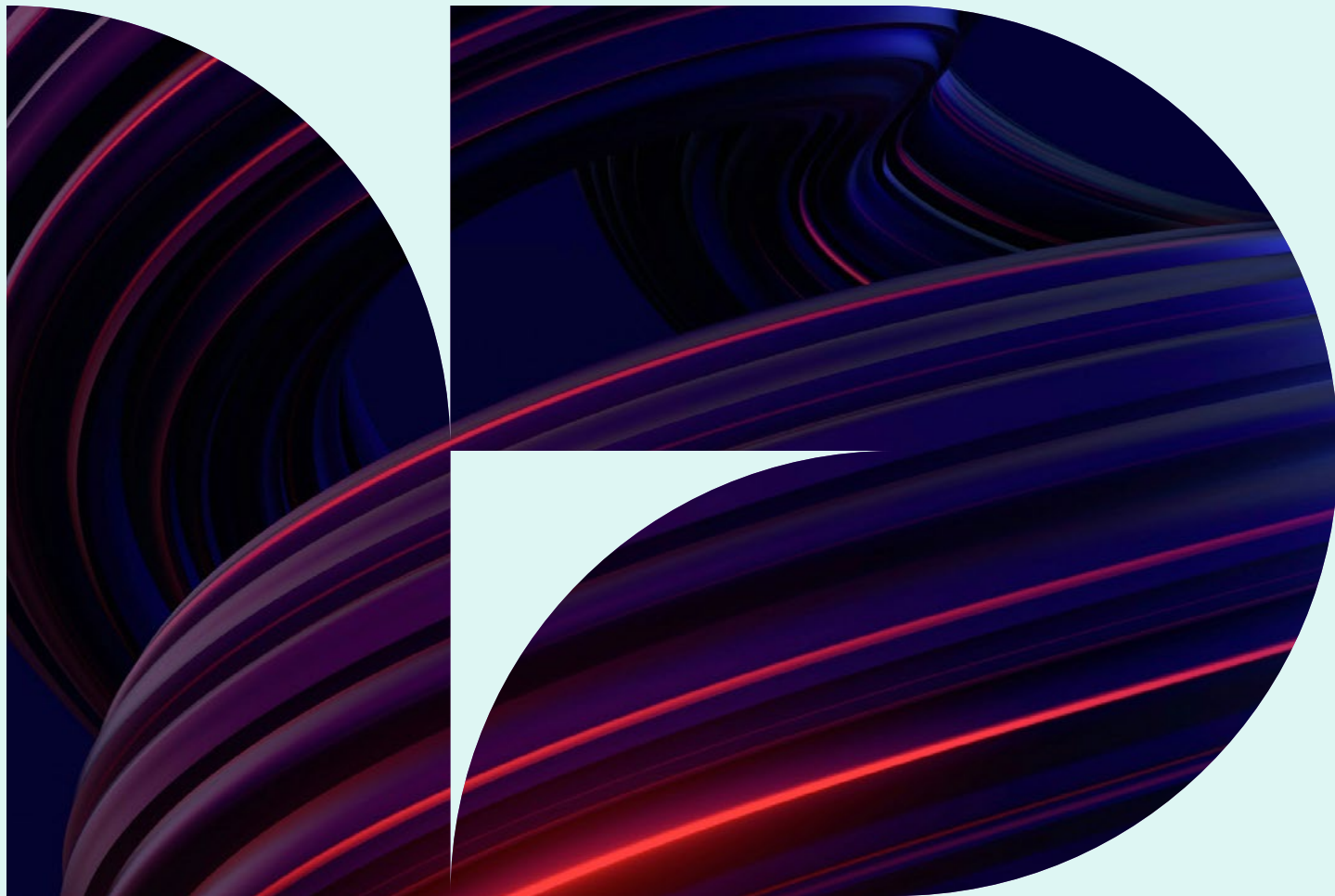
Fixed Network Development Project

The project led by Kuwait Authority of Partnership Projects (KAPP) is to establish a public-private partnership (PPP) to design, finance, build, operate, maintain, and transfer Kuwait’s nationwide, high-speed fiber broadband network.

- KAPP announced a short list of four qualified bidders for the project:
 - › 1. Etisalat + Gulf Investment Corporation
 - › 2. Batelco
 - › 3. Telecom Italia Mobile + Al Ghanim
 - › 4. Brookfield Asset Management

Group Regulatory Compliance:
Compliance is an important aspect of any organization, irrespective of the industry as it ensures the organization can avoid penalties or reputational damage.

- Sustenance Phase commenced in May 2024 to ensure:
 - › Maintenance of Regulatory Compliance Universe.
 - › Management Reporting.
 - › ISO 37301 Readiness Assessment.
- Group RCP Team is engaging with all divisions within Zain Kuwait to provide evidence of compliance with all regulations.
- In Q3 2023, the RCP Portal went live in Kuwait.





Zain Saudi Arabia

Challenges

600, 700, 3800-4000 MHz Auction

- Spectrum auction to grant sub-1 GHz spectrum and extended C-band spectrum to operators

Zain’s Response

- CST conducted the auction in November 2024. Zain secured 2 x 15 MHz in the 600 MHz band at the reserve price. The spectrum acquisition will strengthen Zain Saudi’s sub-1 GHz holdings, enabling the company to enhance its 5G indoor penetration.

Universal Service Fund (USF)

- The Saudi Government considers access to voice telephony and internet services essential for its development strategy. To achieve this, it established the Universal Access and Universal Service Policy and created the USF. The USF is responsible for financing projects that provide these services to underserved areas.
- Zain emerged as the top bidder in five of the tendered projects, securing the majority of contracts. The primary goal of these projects is to expand broadband connectivity to rural areas, achieving speeds of up to 20 Mbps. This expansion will significantly improve internet access and connectivity in underserved regions.

Open Access Agreement

- The Communications and Information Technology Commission (CITC) announced the entry into force of the open access agreement between all six telecommunications companies in the Kingdom. This agreement aims to expand choices for subscribers, as they will be able to choose their broadband service provider independently of fiber infrastructure ownership, which will increase broadband subscriptions and improve service quality.
- The initiative aims to utilize existing fiber-optic infrastructure in the Kingdom and encourage further investment to expand choices for subscribers. The program is also set to raise cooperation between companies and enhance competition to improve quality of services provided.
- Providers are now selling 300 Mbps packages at the price of baseline packages of 100-200 Mbps as per CST request.

Zain Sudan

Challenges

700 MHz Spectrum Usage Penalty

Telecommunication and Post Regulatory Authority (TPRA) allocated 20 MHz in 700 MHz band only for trial in 2023

Zain’s Response

- Zain successfully lobbied to reduce the penalty from USD 3m to USD 1.13m
- Active lobbying for 700 MHz penalty cancelation with the TPRA.

700 MHz Auction

- TPRA re-activated the auction process.
- A public consultation was published to receive MNOs’ views and comments.

Landing Station:

Final approval and agreement sign-off pending environmental survey and other minor approvals (localities and power authorities).

- Delay with Sudan landing station and consortium (approvals from localities and electrical power authorities).
- The delay will negatively impact the positive contribution to both revenue increase and cost reduction.

Microwave Links Fee and spectrum service fees

- TPRA has accepted Zain’s request to reduce microwave links.
- Zain succeeded in saving approximately USD 200K.
- Ongoing lobbying with the TPRA to reduce spectrum service fees.

Student Stamp Fees decision

- Fees increased from 0.25% to 1% of Zain revenue, thus impacting Zain’s profitability.

Cloud Based - Charging and Call Center

- After the shutdown, Zain switched to a cloud-based system from Zain Group.
- The implementation was successful and endorsed by TPRA.

Group Regulatory Compliance:

Compliance is an important aspect of any organization, irrespective of the industry as it ensures the organization can avoid penalties or reputational damage.

- The RCP implementation plan that had been delayed due to the conflict in Sudan, resumed in January 2024.
- Training and workshops are ongoing.
- Compliance instruction manuals are ongoing.



Zain South Sudan

Challenges

Implementation of Automatic Tariff Exchange Rate Adjustment:

Zain network has reached its capacity. National Communications Authority (NCA) offered the company the opportunity to acquire 800 MHz spectrum.

Zain's Response

- Throughout 2024, Zain and other mobile network operators in South Sudan engaged in dialogue with the Bank of South Sudan, the National Communication Authority, and the Ministry of ICT and Postal Services on the critical challenges arising from the differences in the NCA-regulated rate governing the MNO tariffs, the Central Bank rate, and the Commercial Bank rate. Critical challenges and risks associated with the imbalance in exchange rates include rising operational costs, particularly for fuel and network infrastructure, revenue losses, and constrained investment in connectivity and digital transformation initiatives. Through active lobbying, the MNOs were able to (1) secure NCA approvals to adjust the regulated exchange rate by over 377% between January and December 2024, narrowing the gap between the rates (2) secure a consensus agreement between the Central Bank of Sudan and the NCA, formalised in a Memorandum of Understanding which will see the implementation of an automatic adjustment mechanism for the NCA exchange rate, allowing the latter to track and follow the Central Bank rate every 50 days.

International Roaming (ONA):

NCA requested MNOs feedback regarding the implementation of the ONA via a questionnaire

- Roaming traffic over 30 days is considered as international roaming and not ONA roaming traffic.
- Billing system still could not be updated to cater to the request of the regulation.
- In October 2023, a questionnaire was provided to all MNOs, seeking their feedback regarding the ONA implementation.
- Zain provided its feedback and is still awaiting the NCA response.

NCA Tariff adjustment:

NCA exchange rate is at SSP 618.75 : USD 1, market exchange rate is now at SSP 1050 : USD 1.

- Zain will seek the NCA's feedback regarding the tariff adjustment in 2023 to match the current exchange rate set by the Central Bank.
- Discussion put on hold due to the engagement with NCA regarding the 800 MHz spectrum acquisition.

Group Regulatory Compliance:

Group and Zain South Sudan Phase 1 RCP Completion

- Group and Zain South Sudan collaborated on Phase 1 of the RCP.
- Successful completion achieved by June 2024 deadline.





Stakeholder Engagement





Zain is dedicated to engaging openly and transparently with all its stakeholders. This section outlines the company's interactions with various groups, addressing their key concerns, how the company responds to them, and the frequency of these interactions, ensuring the organization takes into account how it can create value.

Zain actively engages with a wide range of stakeholders, including Customers, Shareholders and Investors, Employees, the General Public, Community Institutions, Business Partners, Government Agencies and Regulators. Stakeholders are selected based on their relevance to Zain's business activities and value chain. The company carefully chooses the appropriate channels for gathering insights from each stakeholder group, incorporating these insights into its decision-making process. This engagement is conducted through various communication platforms, including social media channels, meetings, corporate website, press releases, and the Zain applications across markets.

Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
Customers: 49 million customers	Reliable and accessible service	Investments in network quality and coverage through continuous investments in networks to provide the latest and most reliable coverage and quality	Continuously
		Review network performance through monthly and quarterly reviews across all operations	Continuously
	Innovative service	Provide customers with access to the latest technology	Continuously
		Continued to expand 5G networks in Bahrain, Jordan, Kuwait, and Saudi Arabia, and 4G/LTE in Iraq, Sudan South Sudan to address the data services gap	Continuously
		Diversified and explore additional products and services in our line of business	Daily
	Affordable service	Launch tailored products and services covering different value segments that cater to the connectivity needs of customers for both voice and data	Daily
	Accessible service	Provide our customers with both basic connectivity and value-added services at affordable prices	Daily
		Ensure services are available through multiple channels (mobile app, online, retail outlets, and contact centers)	Daily
		Availability of packages for the hearing-impaired	Currently available in Jordan, Kuwait, and assessment conducted for remaining operations
		Provided connectivity in remote areas in South Sudan through network expansion	Annually
		Ensuring sales channels are disability inclusive	Quarterly
		Continued to provide network and cellular service in countries during crisis	Continuously
		Providing digital and alternative channels for product delivery representatives such as inbound customer service agents and tele-sales	Daily
		Training sales agents in sign language	Across all operations
		Providing a customer service hotline for people with disabilities	Currently operational in Bahrain
		Providing a repository of sign language word libraries	Available on the website



Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
Customers: 49 million customers	Accessible service	Partnered with eSSENTIAL Accessibility to ensure that the Zain website complies to the Web Content Accessibility Guidelines (WCAG) 2.1, Level A	Continuously
		Zain Jordan showrooms now offer instant sign language interpretation via tablets, enhancing communication and accessibility for individuals with hearing disabilities	Continuously
		Ensure that the accessibility is implemented and that all our touchpoints are 100% disability inclusive (including digital and physical)	Continuously
	Stay informed about promotional offerings and relevant information	Communicate via direct messaging, social media platforms, and various media outlets	Daily
		Provide updated information on Zain channels	Daily
		Provide professional assistance in all retail stores, outlets, contact centers, and various digital channels such as the Zain app, MyZain, and WhatsApp	Daily
	Customized services – inclusive products and services that cater to different needs and lifestyles	Maintain ongoing engagement with customers to ensure a full understanding of customer needs - examples of engagement processes include customer research and collecting feedback within retail outlets and contact centers	Daily
		Design and offer converged value propositions including mobile service, internet, and others	Daily
		Offer customized packages for specific segments such as youth, students, women, refugees, disabled, and the disadvantaged	Offered continually across all operations. Details are provided in the 'Products and Services' sections
		Zain is a signatory to the GSMA's 'Principles for Driving the Digital Inclusion of Persons with Disabilities'	More details are available in 'Sustainability Agenda' section.
	Ease, clarity and transparency of billing	Offer support through contact centers and other accessible channels	Zain's branches and social media and call centers are available to answer inquiries 24/7, all year round
		Provide online services and billing options	Zain online services are available to customers across communication channels

Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
Customers: 49 million customers	Ease, clarity and transparency of billing	Customer bills and data usage are readily available for customers through our digital channels and call centers	Daily
		Offering customers the option to receive and pay their bills through digital channels, such as SMS, email, and the Zain app, reducing paper usage and promoting environmentally-friendly billing practices	Daily
	Information security and data protection	Zain implements ISO/IEC 27001 standard to include technical, operational, managerial, and physical security controls to protect any information from unauthorized access or disclosure. In addition, conducts security assessments to ensure these controls are effective, vulnerabilities are mitigated, and enhancements are made to the security posture of the company	Information security policies are reviewed annually
		Zain's Data Privacy Policy provides guidance to operations on the collection, processing, and usage of personally identifiable information in compliance with applicable law and regulations	The Data Privacy Policy is available on Zain's official website
		Ensuring that Zain's networks block all Child Sexual Abuse Material (CSAM) content	Working towards having additional CSAM blocking mechanisms Group-wide per country regulations and international best practices. CSAM content is blocked in six operating countries
	Efficient grievance mechanisms	Operate contact centers and respective contact channels such as the branches, call centers, and social media channels, and Zain apps where complaints are routed to the resolution department	Continuously
	High-quality customer care	Continue to address the shift in customer needs and behavior	Continuously
		Maintain various channels to keep customers informed, receive feedback, and measure performance through customer satisfaction surveys, store experience surveys, contact centers, and brand trackers	Continuously
		Track Net Promoter Scores – follow the degree to which customers would recommend our services to others – across operations	Weekly
		Continued to provide an interactive digital channel called zBot, a smart customer service channel utilizing artificial intelligence (AI) to respond to customers' needs	N/A



Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
Shareholders and Investors: Zain's Major Shareholders are: 1. Group of Oman Telecommunications 21.90% 2. Kuwait Investment Authority (KIA) 15.90% 3. The Public Institution for Social Security 5.50% 4. Group of Al-Sharq Holding Co. 5.05%	Strong return on investment	Remain profitable	Weekly
		Increase customer base	Weekly
		Maintain shareholder value	Weekly
		Maintain management access and excellence	Weekly
	Provide a fair and transparent understanding of the company's strategy and business to current and potential investors	Market disclosure	As deemed necessary
		Provide updates through Investor Relations Portal and the Investor Relations App (available in iOS & Google Play Store)	Weekly
		Maintain healthy relationship with the sell-side and buy-side stakeholders	Daily
		Attend Sell-Side conferences	Quarterly
		Open channels of communication with shareholders	Daily
		Increase transparency and efficiency	Daily
		Conduct earnings conference calls	Quarterly
		Quarterly Presentations	Quarterly
		Company Financials	Quarterly
		Host an Annual General Assembly Meeting (AGM)	Annually
		Ensure access to C-suite through field visits or roadshows, and the participation in investor conferences in different regions	Quarterly
	Management excellence	Target potential investors that might be interested in the region and sector	Quarterly
Employees: 7,970 Full-Time employees	Job security and satisfaction	Engage employees, maintain open communication channels, and develop action plans based on employee feedback	Communicate with employees through various channels, including social media and internal communication
		Ensure job security	The company continues to provide salaries even in times of crisis and political unrest

Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
Employees: 7,970 Full-Time employees	Employee benefits	Offer competitive benefit packages comparable to the local market	N/A
		Offer recreational services and packages for employees at a discount	Bi-annually
	Opportunities for development, growth, and skills development	Developed a comprehensive training and development program offering employees opportunities to develop	Offering training programs whenever requested, in addition to periodically sharing training opportunities to employees in their relevant fields
		Established succession management plans and employee guides to facilitate career growth	Ongoing
		Continue to drive ZAINIAC, an internal e-platform for employees to share innovative ideas and create solutions to stimulate creativity within the company	Annually. Details are provided in the 'People and Purpose' section
		Continued the WEABLE GROW initiative in Zain Jordan, a development program facilitated by Zain employees for people with disabilities, providing them with an opportunity to enhance their knowledge of disability inclusion with our customers and employees, and offer them potential employment opportunities	Annually
		NOVA is a two-year strategy aimed at empowering more women into tech roles, advancing our existing women team members, and identifying high potentials in technical roles	Continuously
		Zain Youth (ZY) Mavericks aims to build a network of certified youth experts in various fields across Zain operations	Continuously
		Launched the ZY Counsel program targeting high potential youth, and providing them with trainings as well as empowering them with the opportunity to work on strategic challenges	Ongoing
		Continued the Inclusion, Diversity and Equity University (IDEU) with IE University, which provides employees access to furthering their education through an online Digital Transformation program with the option of attaining a Master's degree	Continuously, the program started in 2023 and was curated for 2,000 employees
		Generation Z: An annual year-long development program for high potential youth to prepare them for future roles for Zain	Annually



Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
Employees: 7,970 Full-Time employees	Opportunities for development, growth, and skills developmen	Launched PACE with IE University and Nokia. Two talent development programs fall under the initiative:	Annually
		1. Zain & IE University's Talent Onboarding Program, which focuses on data analysis and digital transformation	13-month-long program for 25 young professionals from across Zain operating companies ending in Q4 2024
		2. Zain & Nokia ESG Action for Leadership Program which aims to drive design thinking embedded in sustainability	Five-month-long program for 10 female talents from across Zain operating companies ended in Q1 2024
	Competitive salary	Conduct benchmark exercises and salary surveys for similar regional and international organizations and implement a salary scale	Annually
	Working for a company that matches staff's values	Provide access to the internal HR Policy available to all employees through internal channels	Continuously
		Implement multiple engagement channels for employees to propose ideas and voice their concerns	Continuously
		Working towards achieving a gender target of 30% female representation in leadership roles by 2030 through the WE initiative	Quarterly
		Conduct employee engagement survey to gauge and improve overall employee satisfaction, motivation, and commitment within an organization	Annually
		Conduct workshops and webinars that tackle sustainability, gender diversity, disability inclusion, and mental health & wellbeing	Quarterly
		Conduct an Inclusion Assessment to monitor and maintain inclusion levels in the workplace, fostering an inclusive environment for all Zainers	Bi-annually
		WE DISRUPT training facilitated by in-house certified trainers addressing our inclusion competencies and to understand behaviors hindering progress on a Group-wide basis	Quarterly
	Access to international conferences and networking opportunities	Enable employees to participate in conferences, exhibitions, and forums	Employees are encouraged to develop and further their skills on an ongoing basis

Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
Employees: 7,970 Full-Time employees	Health and safety protection	Maintain a Health and Safety policy for employees and temporary workers	Continuously
		Conduct fire and emergency drills by selecting two employees per floor to be trained as fire marshals in case of emergencies	Conduct fire and emergency drills annually as per policy, after obtaining approval from the Department of Civil Defense. In addition, risk teams check emergency access doors monthly to ensure that there are no obstructions to the pathways
		Provide insurance coverage for all employees	Continuously
	Mental health and wellbeing (under the BE WELL initiative)	Provide employees with tools and resources for mindfulness and mental wellbeing	Unlimited access to the Tuhoon app throughout the year
		Provide employees confidential therapy sessions in collaboration with the Kuwait Counseling Center	Each employee across the Group eligible for four sessions at no cost. In Sudan, this offer was extended to Zain employees' children
		Provide workshops on mental wellbeing in the workplace	Quarterly
		Mental Health First Aiders (MHFAs): An internal community of Zainers certified to provide support and guidance for mental health challenges	Continuously
	Minimal visual and noise pollution	Deploy super silent diesel generators in urban areas	Continuously
		Install environmentally-friendly solutions for base stations, where applicable	Continuously
		Minimize the use of space through the deployment of outdoor cabinets where feasible	Continuously
General Public and Community Institutions: Neighborhoods near base stations, media, civil society, NGOs, advocacy groups, children, charities, associations, foundations, schools, universities, and medical institutions	Commitment to upholding Health and Safety standards	Uphold Environmental Social Management Policy (ESMP) Guidelines that include Health and Safety provisions	Continuously
		Conduct electromagnetic field (EMF) assessment as part of our safety procedures for radio operations	Continuously
		Comply with TRA/Ministry of Health base stations frequency ranges	Continuously



Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
General Public and Community Institutions: Neighborhoods near base stations, media, civil society, NGOs, advocacy groups, children, charities, associations, foundations, schools, universities, and medical institutions	Address priority community needs such as education, health, and economic development, and mitigate societal deficits such as youth unemployment, human displacement, and job readiness	Ensure that the company aligns and tracks the 2020-2025 Corporate Sustainability (CS) Strategy	Continuously monitor the CS strategy and track the progress and status of its initiatives on a monthly and quarterly basis internally. More information can be found in the 'Sustainability Agenda' section.
		Support and develop locally relevant CS activities and establish partnerships that further the CS agenda and address prevalent societal deficits	Track progress, monthly and quarterly
		Launch awareness campaigns on the company's social media channels	Monthly
		Working with Child Helpline International to facilitate and mobilize helplines across Zain countries	Quarterly
	Build climate change mitigation & adaptation plans that address physical & transition risks	Install DG Battery hybrid solutions where feasible	Continuously
		Promote the use of solar energy within our operations	Continuously
		Retrofit our Data Centers and Headquarter buildings	Continuously
		Install higher efficiency DC power systems	Continuously
		Utilize outdoor cabinets where feasible	Continuously
		Explore possibilities for site-sharing and implement the 'right-sizing concept'	Continuously
		Implement e-waste recycling and reuse initiatives	Continuously
		Implement ESMP guidelines on site selection, construction, and maintenance	Continuously
		Set short, medium, & long-term carbon emission reduction targets	Continuously
		Benchmark energy efficiency progress with similar regional and global organizations	Continuously
		Actively implement Zain's Climate Action transition to achieve its net-zero ambition	Quarterly
		Maintain membership of the Carbon Disclosure Project (CDP)	Annually

Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
General Public and Community Institutions: Neighborhoods near base stations, media, civil society, NGOs, advocacy groups, children, charities, associations, foundations, schools, universities, and medical institutions	Build climate change mitigation & adaptation plans that address physical & transition risks	Launched several social media campaigns raising awareness on the increasing risks of climate change with the intention of impacting behavioral change	Quarterly
		Committed to furthering the Post-2015 Sustainable Development Goals by joining the <u>United Nations Global Compact Initiative</u>	Continuously
		Track the company's water consumption with the aim to reducing it	Quarterly
		Promote biodiversity initiatives and ensure minimal biodiversity impacts on all activities	Continuously
Business Partners: Suppliers, contractors, and distributors	Engage Zain in relevant community events and forums	Participate in relevant community events and forums	Regularly
	Provide favorable terms	Encourage discussions with relevant departments through upper management	To ensure that certain clauses are made with the highest level of transparency and fairness, Zain continuously revises its terms and conditions to ensure they are aligned with best practices
		Engages in open and collaborative discussions with business partners to negotiate contracts that meet mutual goals	As deemed necessary
		Ensure transparent and fair contractual agreements with the highest level of transparency and fairness	Continuously
	Provide timely payments	Conduct periodic evaluations	Daily
		Maintain open channels of communication and clearly articulate contract terms and agreements to ensure parties agree on method and date of payments	Quarterly basis and depending on each contract
	Maintain opportunities for frequent interaction and engagement with Zain	Maintain open channels of communication	Continuously
		Participate in forums that include all Zain's operating markets, to ensure alignment in strategic approach	Annually
		Automate processes of engagement with suppliers to ensure transparent and timely responses	Continuously



Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
Business Partners: Suppliers, contractors, and distributors	Remain informed about Zain's guidelines and standards regarding human rights, Health and Safety, the environment, and labor standards	Communicate Zain's Supplier Code of Conduct, which is included in contracts	Zain communicates the Supplier Code of Conduct when onboarding new suppliers and to existing suppliers on an annual basis. Zain also resends its Supplier Code of Conduct to all suppliers if changes are made
		Provide Supplier Assessment Questionnaire when onboarding new suppliers and recommunicate to existing ones	Annually
		Communicates and tracks its suppliers' alignment to the Human Rights Policy Statement	Annually
		Train suppliers on relevant sustainability topics including Supplier Code of Conduct, human rights, and anti-corruption	Quarterly
		Conduct physical audits to ensure they are aligned to Zain's standards	Quarterly
	Collaborate with Zain on infrastructure energy efficiency improvements	Engage through workshops and Memorandums of Understanding (MoUs) for collaborative efforts on improving energy efficiency and working towards net-zero by 2050	Continuously
	Access to information about the company including financial data, customer data, and other relevant information	Publish a financial report and issue other periodic reports	Annually
		Publish a sustainability report	Annually
		Publish disclosure reports	Quarterly
		Maintain open direct channels and frequent engagement with public officials	Continuously

Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
Government and Regulators: Boursa Kuwait, Competition Protection Agency, Anti-Corruption (Nazaha), Ministry of Finance, Ministry of Commerce, and Industry (MOCI), Capital Markets Authority (CMA), Communication and Information Technology Regulatory Authority (CITRA), Kuwait Foundation for the Advancement of Science (KFAS), other national telecommunications regulators, Ministries of Communication, GSMA and ITU	Access to telecommunications services	Maintain network quality and coverage	Continuously
		Comply with laws and regulations	As per laws and regulations, reports are provided annually or bi-annually and provide up-to-date disclosures on material information
	Compliance with tax laws and regulations	Submit corporate income tax returns, and Zakat and National Labor Support Tax (NLST) declarations, where applicable	Annually
		File indirect tax declarations	Monthly basis depending on the local tax regulations, where applicable
		Submit payroll income tax declarations to the tax authorities, where applicable	Monthly basis depending on the local tax regulations, where applicable
		Conduct meetings and ongoing contact with tax authorities to ensure we are up to date with the most recent tax laws	Continuous engagement with tax authorities
		Engage with external tax advisors and receive newsletters on the most recent tax laws and regulations	Continuously
	Compliance with regulations	Ensure and oversee compliance through Corporate Governance and Compliance department, Regulatory department, and other relevant functions	Continuous engagement with regulatory authorities
		Ensure compliance with the regulatory requirements in the countries where we operate	Continuous cooperation is in place between internal and external parties to ensure that any changes in regulations are addressed immediately
	Stakeholders' Rights Protection	Implemented through the Corporate Governance framework	Continuously including periodic reporting
		Policies are approved by the Board of Directors, shared with executive management, and publicly published on Zain's website: Stakeholders' Rights Protection / Code of Conduct / Conflict of Interest & Related Party Transactions Policy (within the Corporate Governance Framework) / Whistleblowing Policy / Disclosure Policy & other policies	Revision is done by the corporate governance team periodically



Our Stakeholders	Stakeholder Priorities	Our Response	Frequency of Engagement
Government and Regulators: Boursa Kuwait, Competition Protection Agency, Anti-Corruption (Nazaha), Ministry of Finance, Ministry of Commerce, and Industry (MOCI), Capital Markets Authority (CMA), Communication and Information Technology Regulatory Authority (CITRA), Kuwait Foundation for the Advancement of Science (KFAS), other national telecommunications regulators, Ministries of Communication, GSMA and ITU	Stakeholders' Rights Protection	Ensures that principles of transparency are applied throughout the organization with the focus by Corporate Governance and Investor Relations departments on working collectively to guarantee transparency and efficiency throughout operations	Continuously including periodic reporting
	To develop the company's reputation and provide insurance against unforeseen events	Invest in network quality and coverage	Continuously
		Maintain business continuity and contingency plans	Continuously
		Maintain insurance coverage for critical assets such as data centers and employees	Continuously
	Awareness of key organizational risks	Update Risk Register	Annually
		Monitor risk trends through Key Risk Indicators	Quarterly
		Develop and track progress of plans for all significant company risks that are communicated directly to the Board Risk Committee	Quarterly





Products & Services





In 2024, various opportunities were provided for Zain to explore how it could further generate value across its value chain. The company ensured that when launching products and services it considered the short-, medium- and long-term aspects for the business, society, and the environment. Through this lens, Zain continued to take a holistic approach factoring in a 360 view of the value it creates for its stakeholders, including customers, employees, suppliers, and the broader community.

Framing the context:

The unique market demographics across Zain’s different operating communities present both challenges and opportunities for its commercial activities. The industry’s competitive landscape provides Zain with the opportunity to prioritize brand differentiation across its markets by launching inclusive products and services to meet the needs of different segments such as people with disabilities, environmentally conscious consumers, the elderly, and youth. For example, Zain KSA effectively offered unique packages such as SHABAB, FLEX and VISITOR, which aim to further engage with targeted communities such as youth, blue collar workers, expats, and pilgrimage visitors.

However, this tailored approach is not without its challenges. A key challenge facing Zain’s operations is the rapidly evolving regulatory context. To address this, the company is consistently ensuring that it is up to date and compliant with any new regulation introduced to the market. Another challenge evident in markets such as Sudan and South Sudan is the volatility of the local currency and economic instability coupled with the geopolitical conflict. Due to the large geography and scattered population in Iraq, the company faces difficulty in ensuring it can continuously increase its digital touchpoints to meet the needs of its customers. Zain Kuwait faces the challenge of promoting sustainable products and services with low environmental impact, which often come at a higher cost. Educating consumers on the long-term benefits of such products is important in addressing this barrier.

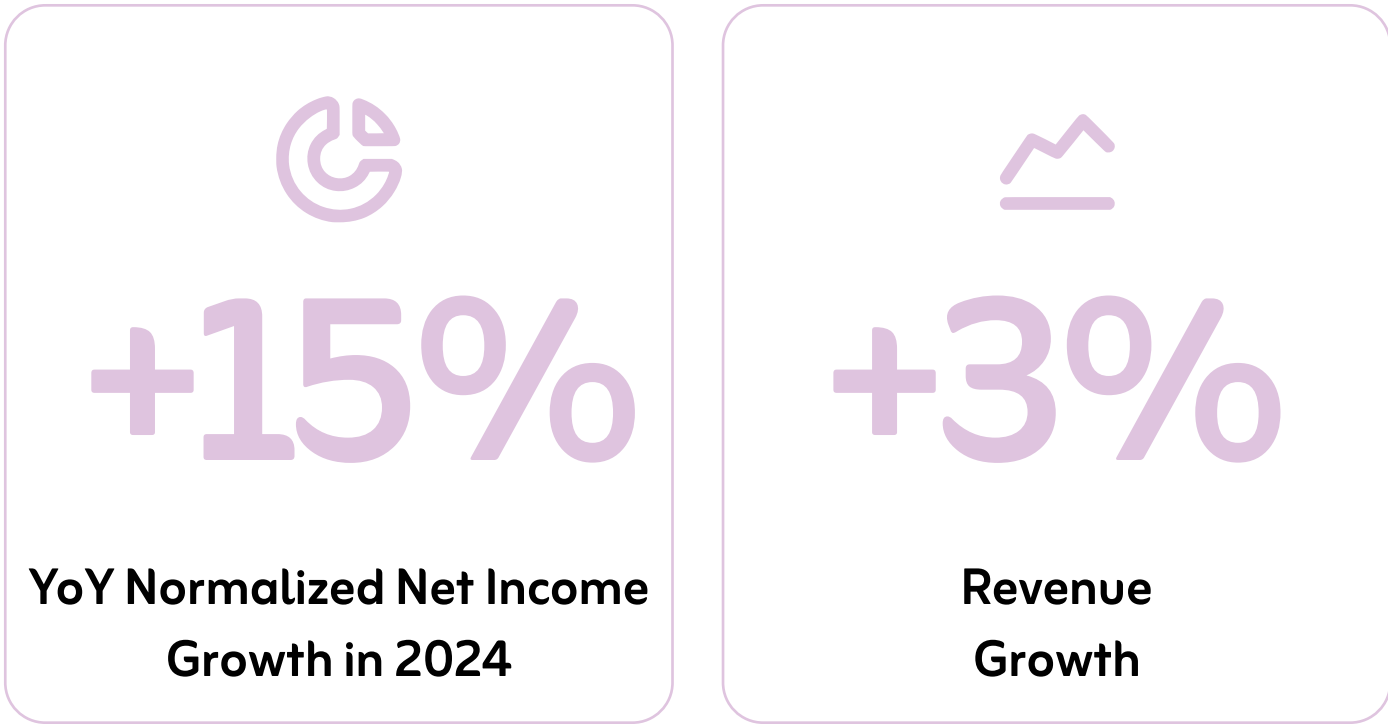
Within this context, the following section highlights Zain’s main commercial products and services:

- Economic Performance
- Zain’s Value Chain
- Core Services
- Non-Core Services
- Marketing, Advertising and communications
- Zain Subsidiaries

Economic Performance:

In 2024, Zain achieved a solid financial performance, representing a 3% year-on-year (Y-o-Y) revenue growth

Financial Performance: Direct Economic Value Generated and Distributed



	2024	
	KD m	US\$ m
Revenues	1,972	6,429
Cost of Sales	(649)	(2,115)
Operating Costs	(634)	(2,067)
Net Profit	208	677
Retained Earnings	517	1,679
Dividends Paid	(161)	(525)
Dividends paid to non-controlling interests	(24)	(78)
Staff Costs	175	572
Finance Costs Paid	(107)	(349)
(Repayment of)/ proceeds from bank borrowings (net)	108	352
Income Tax Payments	(13)	(42)
Kuwait Foundation for the Advancement of Sciences Paid	(2)	(7)
National Labor Support Tax and Zakat Paid	(12)	(39)

The Board of Directors recommended a cash dividend of 25 fils per share for the second half of 2024, subject to Annual General Assembly approval. This dividend follows the semi-annual dividend of 10 fils distributed in 2024, totaling 35 fils per share for the year 2024.



Zain’s Value Chain:

Zain’s value chain covers various streams, each crucial in supporting the company’s core activities and addressing customer needs. Zain’s value chain mainly consists of network and equipment suppliers, product R&D, hardware and software producers, cloud service providers, system integrators, and distribution networks. The company determines the value it generates through its value chain from a business, society, and environmental perspective demonstrated below:

1. Network and Equipment Suppliers:

These suppliers are crucial for maintaining and expanding Zain’s network infrastructure. They provide the technology necessary for reliable and high-quality network services, which directly impacts Zain’s ability to provide quality products to its customers.

2. Product R&D:

Product research and development (R&D) drives innovation, leading to the creation of new technologies and services that can enhance quality of life. Within Zain’s value chain, R&D plays a critical role in developing innovative communications tools and digital services. These advancements improve connectivity and accessibility for diverse communities across the MENA region, aligning with Zain’s commitment to enabling inclusive and sustainable digital transformation.

3. Hardware and Software Producers:

A growing number of hardware and software producers are increasingly focusing on sustainable practices, such as energy-efficient components and reducing e-waste. Adopting these practices helps Zain reduce its carbon footprint associated with technology production and usage.

4. Cloud Service Providers:

Cloud service providers enable Zain to offer scalable solutions to its customers, facilitating efficient data storage, management, and processing. This supports business agility and allows Zain to adapt to market demands and technological advancements.

5. System Integrators:

System integrators enhance operational efficiency by ensuring that different technology systems work together. This integration reduces costs and improves overall performance, contributing to more effective service delivery and innovation.

6. Distribution Networks:

Effective distribution channels ensure that products and services reach customers efficiently, including marginalized or remote communities. This increases access to essential services and helps bridge digital gaps.

Core Services:

This section examines the various channels through which Zain delivers its products and services to customers, as well as the job opportunities generated by these channels highlighting the company’s impact on the social capital. It also showcases examples of core services developed specifically to cater to targeted communities.

Zain’s Distribution Channels

This year, through its distribution channels, Zain generated 113,967 jobs that helped boost economic activity across its markets.

Zain's Economic Impact through its Value Chain - Our Supply Chain 2024

	Bahrain	Iraq	Jordan	Kuwait	Saudi Arabia	Sudan	South Sudan
Outlets	3,400	14,597	2,209	3,610	1,664	31,147	37,139
Distributors	5	1	4	7	2,883	47	14
Franchise shops	9	78	48	53	200	48	0
Flagship and Zain-owned stores	8	26	27	12	40	2	12

Zain’s Economic Impact through its Value Chain - Our Supply Chain 2023

	Bahrain	Iraq	Jordan	Kuwait	Saudi Arabia	Sudan	South Sudan
Outlets	3,000	14,597	2,991	3,707	1,400	31,855	22,000
Distributors	6	1	5	10	2,000	44	13
Franchise shops	0	78	53	98	224	20	0
Flagship and Zain-owned stores	17	26	27 (1 Owned + 26 Rented)	14	33	2	12

Jobs provided in 2024

Bahrain	5,053
Iraq	1,325
Jordan	4,820
Kuwait	5,710
Saudi Arabia	2,750
Sudan	32,309
South Sudan	62,000





Addressing Vulnerable Segments

Supporting Communities in Sudan during the Conflict

Between January - June 2024, Zain Sudan successfully relaunched its product portfolio, to all targeted marketing segments, despite numerous challenges posed by the network shutdown and the limitations of the disaster recovery charging system. The key achievements during this period included:

- Introduction of a new Unified USSD menu with dynamic features tailored to different target segments, enhancing customer experience across various segments.
- Launch of a new voice packages portfolio, offering a variety of options with different validities and resources, specifically designed to cater to the needs of different market segments including mass, youth and high ARPU customers (HAC).
- Restoration of the internet-on-mobile and data cards packages, along with the introduction of new weekly packages, targeting specific customer preferences.
- Relaunch of the Taktik portfolio – Zain Sudan’s differentiated offerings with competitive data pricing per unit, customized to meet the increased data connectivity demand in the current market situation. As of June 2024, Taktik counted 804,326 subscribers.
- Launch of a Hajj offer, featuring a special roaming package for customers traveling to Saudi Arabia.
- Restoration of the International and Roaming portfolio, ensuring the provision of essential services for customers.

BASMA LINE+

Zain Jordan’s Basma Line is now revamped to Basma Line+, which is a mobile bundle package tailored for deaf and mute customers. The revamped line was developed based on focus group sessions conducted with the target audience. Based on the feedback, Zain Jordan doubled the cellular data available within the bundle to 25GBs, 3,000 minutes of video calls, 20,000 minutes on Zain lines, 3,000 minutes local calling minutes on other networks, and 3,000 local SMS and zero rating on calling the 114-emergency line.

In addition, during the year, Zain Jordan launched the 114 emergency application, which provides a video platform feature for the emergency number of the Kingdom to enable people from the deaf community to report emergencies across any mobile network. This application is a continuation of the development of the emergency line project for the deaf community (114), under a specialized work stream that focuses on developing tools to support people with disabilities to access communications and information technology services. Currently, 290 subscribers are subscribed to the Basma Line number bundle. Zain Jordan is working on migrating subscribers from the older version to use Basma Line+.

Kaspersky Safe Kids

Zain Kuwait continues to offer Kaspersky Safe Kids, an all-in-one parental control app to help protect children online. Features of this application include:

- GPS tracking and alerts: Ability to find a child on a map, geofence a safe area for them to remain in, and receive an alert should the child leave it
- YouTube Safe Search: Ability to view a child’s YouTube search history and restrict inappropriate content
- Website filters: The ability to block adult content and customize a list of sites and applications that a child can only visit with the adult’s permission.
- Screen time and application usage: Manage the child’s screen time per day, per device in alignment to the schedule and rules.

Launched last year, there are a total of 16 activations per day to date and 501 active subscriptions.



Non-core Products and Services

To further diversify the company’s products and services, Zain continued to establish different lines of business that are scalable and applicable across markets.

1. Financial Inclusion

Zain FinTech, the financial services arm of Zain Group, offers services across its Middle East and Africa footprint, including Zain Cash in Jordan and Iraq, Tamam in Saudi Arabia, Bede in Bahrain and soon in Kuwait and Sudan. Zain FinTech services offer a rich and much-needed range of innovative products and services related to payments, remittances, credit cards, and micro-finance within Zain’s ecosystem and beyond. Zain FinTech’s B2B software as a service (SaaS) solution provider FOO specializes in empowering businesses with fintech offerings built entirely in-house, which optimize digital capabilities for clients across diverse industries and enables them to deliver an unparalleled user experience.

The following products and services are currently offered in Zain’s markets

- Payment Services
- Credit card
- Virtual card
- ATM Services
- International remittances
- Cash collection
- Corporate cards
- Expense & allowance management
- Digital vouchers
- Micro-financing
- BNPL
- Salary disbursements

2. Zain Esports



During 2024, Zain Esports undertook 50 tournaments and activations across Zain operations in Kuwait, Saudi Arabia, Bahrain, Jordan, and Iraq. Since first launching in 2021, Zain Esports has attracted approximately 70,000 participants and garnered 160 million+ social media impressions regionally. Moreover, Zain Esports currently has 210,000 social media followers and during 2024, 820,000+ unique viewers watched Zain Esports tournaments streamed live on Twitch and YouTube.

Zain has invested heavily in network upgrades in recent years, with gaming being one of the most significant business use cases for 5G and fiber-to-the-home (FTTH). Zain was able to identify this opportunity early on, working to cultivate the e-gaming community across the Middle East in general, and within its markets of operation in particular.

This investment in network and resources has resulted in the development of a vibrant e-gaming ecosystem across regional markets, with Zain Esports leading and involved in multiple gaming activities centered around the main esports titles, namely Fortnite, Counter Strike, Call of Duty, PUBG Mobile, League of Legends, FC 24 (previously FIFA), Valorant, etc.

- **Regionwide:** Notably during 2024, Zain Esports partnered with Riot games in more than 15 venues across eight countries to launch the League of Legend MENA servers that saw more than 5,000 gamers participate and received more than 45 million impressions.
- **Kuwait:** Zain Esports conducted multiple offline football tournaments in Kuwait throughout 2024 with hundreds of gamers competing in the 62 matches played.
- **Saudi Arabia:** Zain Esports’ local arm PLAYHERA continued to support the Saudi gaming system.
- **Bahrain:** Zain Esports partnered with universities to launch the Zain University League within the Kingdom, seeing more than 300 up-and-coming gamers participate in various tournaments and workshops held in the recently established Zain Esports Lab within the Zain HQ offices.
- **Jordan:** Zain partnered with the First Jordan Gaming and Esports Summit, as well as being the main sponsor of the Jordanian Esports Federation - collaborating in multiple tournaments across the year. Zain Esports in Jordan holds regular activations at its new state-of-the-art venue, the Dome, in partnership with gamergg, a Jordanian esports company specializing in tournament organization.
- **Iraq:** Zain Esports participated in the Esports World Cup 2024 Tekken 8 held in Riyadh, Saudi Arabia. Additionally, Zain Esports in Iraq was a strategic partner to the Iraq International Information & Telecommunication Technology Expo (ITEX), supporting its monthly esports tournaments.



Marketing, Advertising and Communications

Responsible Marketing & Communications Standard

In line with Zain Group's commitment to ethical and transparent marketing and communications, the Responsible Marketing and Communications Standard was launched on March 6, 2024. This Standard was developed following an internal benchmarking assessment exercise using UNICEF's Child Rights Impact Self-Assessment Tool for Mobile Operators (MO-CRIA) 'Products, Sales, & Marketing' category, where the company evaluated the commercial practices of all its operating companies concerning children's rights.

The Responsible Marketing and Communications Standard reflects Zain's dedication to maintaining the highest levels of responsibility, transparency, and ethics in its marketing and communication activities. It ensures that Zain's practices do not exploit marginalized or vulnerable populations and promote inclusivity and diversity. The key principles outlined in the Standard include:

- 1. Transparent Communication: Zain pledges to provide clear, accurate, and understandable information in its marketing communications, with a particular focus on responsibly marketing products and services to children. This includes distinguishing promotional content from non-promotional material and avoiding exaggeration or misleading information.
- 2. Ethical Advertising: Zain adheres to laws, regulations, and industry standards, such as UNICEF's MO-CRIA, ensuring that marketing materials for child-directed products and services are suitable for all age groups. Additionally, Zain avoids exploiting children's vulnerabilities and using deceptive or manipulative techniques.
- 3. Inclusive Marketing: Zain's marketing materials and campaigns promote diversity and inclusion, challenge stereotypes, and avoid discriminatory practices. Zain commits to not engaging with organizations involved in discriminatory actions.

- 4. Parental and Guardian Consent: Zain obtains parental consent when collecting personal information from children, provides clear instructions on managing a child's participation in marketing activities, and ensures campaigns involving children comply with local laws and prioritize their safety.
- 5. Responsible Use of Digital Channels: Zain prioritizes child safety in digital marketing content and platforms, complies with its data privacy regulations, and encourages balanced technology use among children.
- 6. Purpose-Driven Partnerships: Zain seeks partnerships with organizations and individuals sharing its commitment to responsible marketing, conducting due diligence to ensure partners align with its standards of transparency, ethics, and equality.

The scope of the Standard covers Zain's Commercial/Marketing Communications, Corporate Communications, and Branding departments and extends to all Zain operations, subsidiaries, suppliers, and third parties involved in creating Zain-branded content. The Standard is being implemented across the Group with suppliers acknowledging and aligning to the Standard. In addition, all new employees need to align to the Standard to ensure proper implementation.

Please find the link to the Responsible Marketing & Communications Standard Policy Statement [here](#).

Zain's Subsidiaries

ZainTECH

By focusing on real business challenges, ZainTECH's team of industry-specialized experts work with customers to design and build the best digital solutions for their specific organization. With regional centers of expertise across eight countries in the MEA/Middle East region, region, in-country cloud-based platforms, and digital assets, ZainTECH delivers its services with lower risks and less upfront capital investment.

ZainTECH's approach to sustainability with respect to products and services is twofold – specific solutions for sustainability, and an approach to weave sustainability outcomes into everything it does from each business unit.

ZainTECH's Sustainability platform

ZainTECH Sustainability platform provides integrated smart building solutions optimizing energy, reducing carbon emissions, and lowering operational costs. Our cloud-based platform consolidates fragmented systems into one unified interface, delivering real-time insights, asset control, and actionable recommendations, accelerating compliance and efficiency.

Digital Solutions Business Unit

Our digital solutions enable sustainability across all ZainTECH's solutions by leveraging advanced analytics, IoT, and automation to optimize resource efficiency, lower environmental impact, and proactively reduce energy consumption and emissions.

Cloud Business Unit

Sustainability in and from the Cloud – driving green transformation: Reduce operating requirements and migrate IT workloads into more sustainable datacenters with an accelerated shift towards sustainable energy and clear decarbonization targets that are up to 98% more carbon efficient than traditional on-premise datacenters.

Data and AI Business Unit

Data-driven sustainability – enabling smarter green decisions: Enables organizations to leverage their data to make better-informed, more sustainable decisions while efficiently managing the escalating costs of handling large and growing data sets, thus supporting

their ESG goals by optimizing resource use, reducing environmental impact, and improving governance

Cybersecurity Business Unit

Cybersecurity and sustainability - protecting data and the environment:

Enable organizations to reduce their carbon footprint, while maintaining or even improving organizational protection and resilience by mapping security controls according to risks and emissions, and focusing on themes with a high potential for reducing emissions, but with little or no impact on the level of risk.

Drones & Robotics Business Unit

Conduct safe, non-invasive inspections to reduce operational downtime. Accurate data and collection and maintenance enhancements. Eliminates need for heavy equipment to lower emissions and preserve surroundings.

Key achievements since ZainTECH's establishment in October 2021 include:

- March 2022 – Announced the launch of world-class managed cloud services and cybersecurity solutions to enterprises and government entities with Zain Business in Kuwait
- October 2022 – Acquisition of BIOS Middle East, a leading managed cloud service provider
- May 2023 – The acquisition of Adfolks, a UAE-based cloud-native engineering firm that provides a comprehensive range of cloud transformation services. Adfolks was founded in 2016 and is recognized for its expertise in modern infrastructure, application modernization, security, data, machine learning, and automation
- October 2023 – Agreement to acquire Specialized Technical Services Company (STS Arabia), Jordan's largest digital transformation solutions company, which also has a prominent presence in Saudi Arabia, the United Arab Emirates, Bahrain, and Iraq
- December 2023- completion of its state-of-the-art Information and Communication Technology (ICT) Hub and the expansion of its operations in Dubai Internet City

- January 2024 - Completed acquisition of STS Arabia.
- February 2024: Completed acquisition of Citrus Consulting – Advanced Tier Amazon Web Services (AWS) partner to further strengthen ZainTECH's AWS Center of Excellence.

Activities throughout 2024:

- The official launch of ZainTECH in Bahrain and Saudi Arabia, aiming to assist the digital transformation of enterprises and government entities.
- Entered a strategic partnership with SAIMOS, a Europe-based leading vendor that uses Intel computer processors to efficiently analyze video footage and manage geographic location data to deliver an advanced Video Analytics as a Service (VAaaS) solution.
- Made its debut at LEAP, the largest technology exhibitions and conferences in the region in Saudi Arabia.
- Entered a partnership agreement with GitLab, a leading comprehensive open-source provider that integrates security into its software development and operations processes. This collaboration serves to leverage the latter's advanced engineering capabilities to roll out services in Saudi Arabia.
- Earned the Microsoft Azure Expert Managed Service Provider (MSP) status, awarded to organizations that demonstrate exceptional capabilities in delivering comprehensive, end-to-end solutions on the Azure cloud platform.
- Entered a Share Purchase Agreement (SPA) with Redington, an international technology solutions provider, to acquire the seller's Consulting and Transformation Services arm, Citrus Consulting, a regional AWS Advanced Consulting Partner with a strong operational footprint across the Gulf region
- Partnered HYAS Infosec to deploy HYAS' top-rated Protect solution across the Middle East, enhancing security and protection against malware and attacks.
- Signed a strategic partnership agreement with Vercara to deliver Vercara's advanced cloud-based security solutions, which protect businesses' online presence from a range of cyberthreats.



- Announced the commencement of its operations in Iraq through the signing of a Memorandum of Understanding (MoU) with Horizon.
- Through its partnership with DATANUUM, ZainTECH enhances customer data engagement and retention across the Middle East, focusing on data privacy, personalized engagement, and scalable solutions for retail and healthcare sectors.
- In collaboration with Urbi, ZainTECH is set to revolutionize geospatial innovation and smart building technologies in MENA. Targeting improvements in sustainability, transportation, real estate using, AI, blockchain and IoT technologies.
- By joining forces with HTC VIVE to bring industry-leading XR hardware and the VIVERSE Platform to the MEA region, expanding business collaboration and productivity through XR solutions.
- Earning the SPIRE™ Qualified Company Designation from UL Solutions to become the first ICT company in the region to strengthen its leadership in the smart building sector. This accreditation boosts the ability to deliver certified smart building solutions.
- In partnership with FICO and Lean Technologies, Tamam and ZainTECH launch an AI-driven credit assessment model to advance financial inclusion and data- driven financial solutions in Saudi Arabia.
- Accelerates cloud adoption with Nutanix to drive digital transformation across the region by enabling enterprises and government entities to modernize their IT infrastructure.
- A new collaboration with Huawei enables ZainTECH to enhance digital services across MENA, with a focus on 5G, cloud, AI, cybersecurity, and smart city solutions.
- Integrates digital twin technology into enterprise solutions to optimize operations and drive growth across industries in MENA through virtual replicas of physical assets and systems, in partnership with Tencent Cloud.
- Accelerates IT modernization and cloud adoption across the MENA region in collaboration with Red Hat, enabling enterprises to meet evolving market demands with flexible and scalable IT solutions.
- Oracle and ZainTECH are working together to drive cloud, cybersecurity, and digital innovation throughout the MENA region.



Dizlee – Zain Group’s API platform

Dizlee, Zain’s API platform provider, is a digital monetization ecosystem operator offering an appealing array of content and gaming services, direct billing, messaging, and digital authentication services, among other solutions, on one platform. To standardize the digital services offerings in Zain’s markets, as a one-stop-shop, Dizlee boats one of the largest premium customer bases in the region, enabling growth opportunities for digital content providers. Dizlee is committed to streamlining partners' needs regarding contractual relationships and financial reconciliations.

In Q2 2024, Dizlee soft launched the first API marketplace in the region, a bold initiative that places it at the forefront of digital transformation. The API marketplace serves as a hub for partnerships across multiple industries, with an initial focus on a Communication Platform as a Service (CPaaS) solution. These services cater to delivery companies, fintech firms, and insurance providers, with offerings ranging from number masking and call recording to location sharing—all designed to meet the specific needs of enterprises.

What sets Dizlee’s API marketplace apart is its ability to offer tailor-made solutions for various industries while maintaining a customer-centric and agile approach. This adaptability enables enterprises to integrate digital services rapidly, making it easier for them to meet their clients' ever evolving requirements.



*XR Academy experienced a large increase in 2024 due to the addition of new markets.



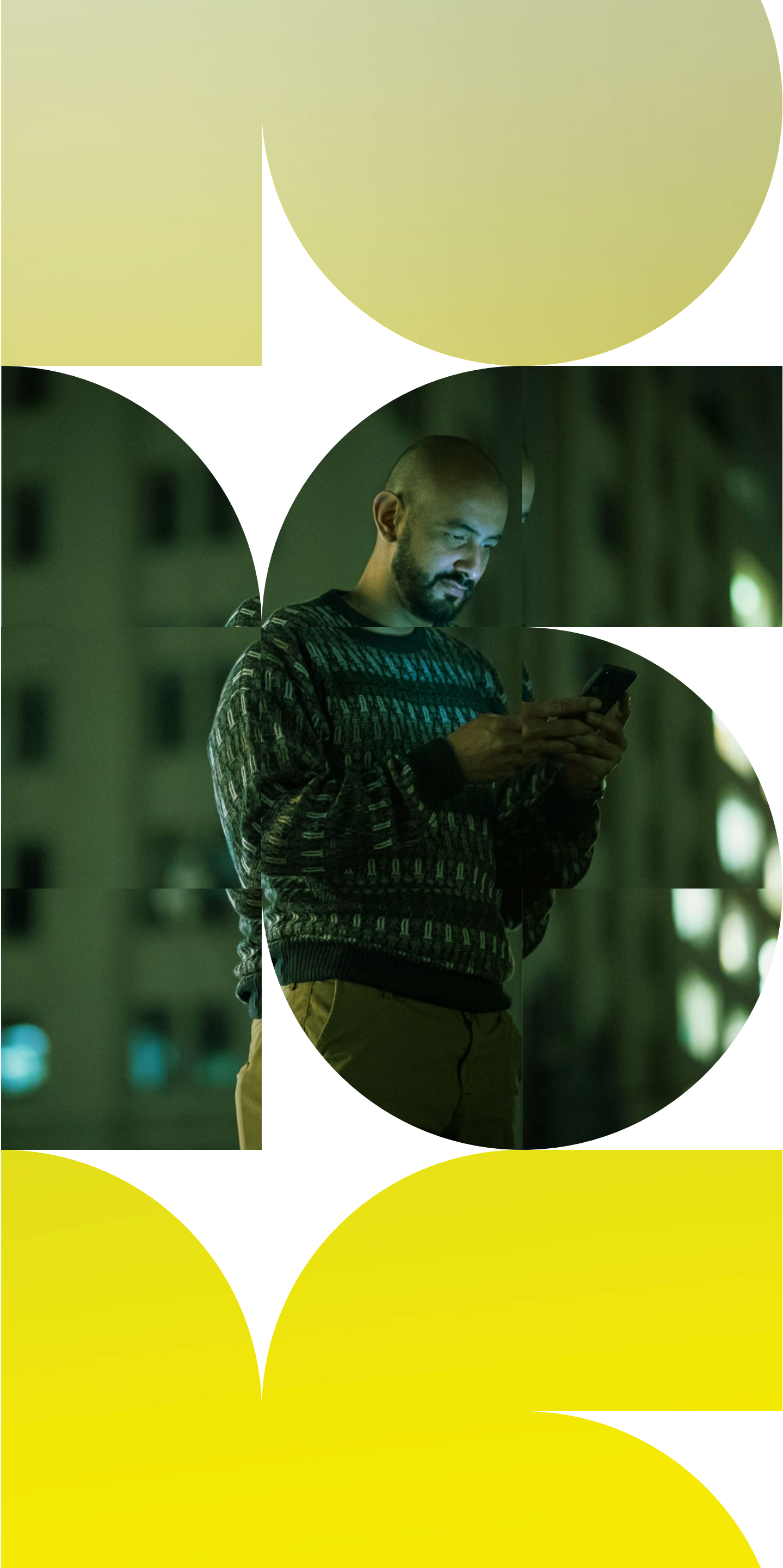
Zain Omantel International (ZOI)

Zain Omantel International (ZOI) represents a significant milestone in regional collaboration, aimed at enhancing global connectivity and strengthening digital infrastructure. The joint venture is between Zain and Omantel, Oman's leading integrated telecommunications services provider and the preeminent regional wholesale provider.

The partnership is transforming the wholesale telecommunications sector by leveraging the combined infrastructure and capabilities of Zain and Omantel to provide comprehensive services to global customers. ZOI addresses the full spectrum of telecommunications needs for regional operators, international carriers, data centers, hyperscalers, and content and cloud providers, serving over 50 million subscribers across eight countries.

- Products and services:
- Infrastructure: subsea and terrestrial cables and data centers
 - Connectivity and capacity: high reliability and low latency global connections
 - Internet: access to global internet gateways and content connect
 - Carrier Solutions: international voice, messaging and mobile services
 - Worldwide Roaming: seamless coverage in more than 200 countries

- 2024 Key Highlights:
- One Consortium Membership: ZOI was the first telco from our region to join the One Consortium, a global forum mitigating illegal and unwanted international voice traffic, reinforcing security and trust in telecommunications.
 - ASN Integration: The seamless integration of Zain and Omantel’s Autonomous System Numbers (ASN) has optimized routing efficiency, ensuring superior service delivery across ZOI’s vast network. This resulted in ZOI having the highest ASN rank in the region.
 - ZOI Ambassador Program: Empowering employees as brand advocates, this initiative has fostered a stronger corporate identity and enhanced engagement with industry stakeholders. It also reflects ZOI’s investment in human capital, which is its most valuable asset.
 - Awards: ZOI has won several prestigious international awards:
 - › Best Blockchain/Security Solution – Global Connectivity Awards by Capacity Media in London
 - › Best Subsea Cable Operator – Carrier Community Global Awards in Berlin
 - › Young Professional of the Year: Reham Al Farsi, Marketing & Communications Manager – Carrier Community Global Awards in Berlin



Customer Base

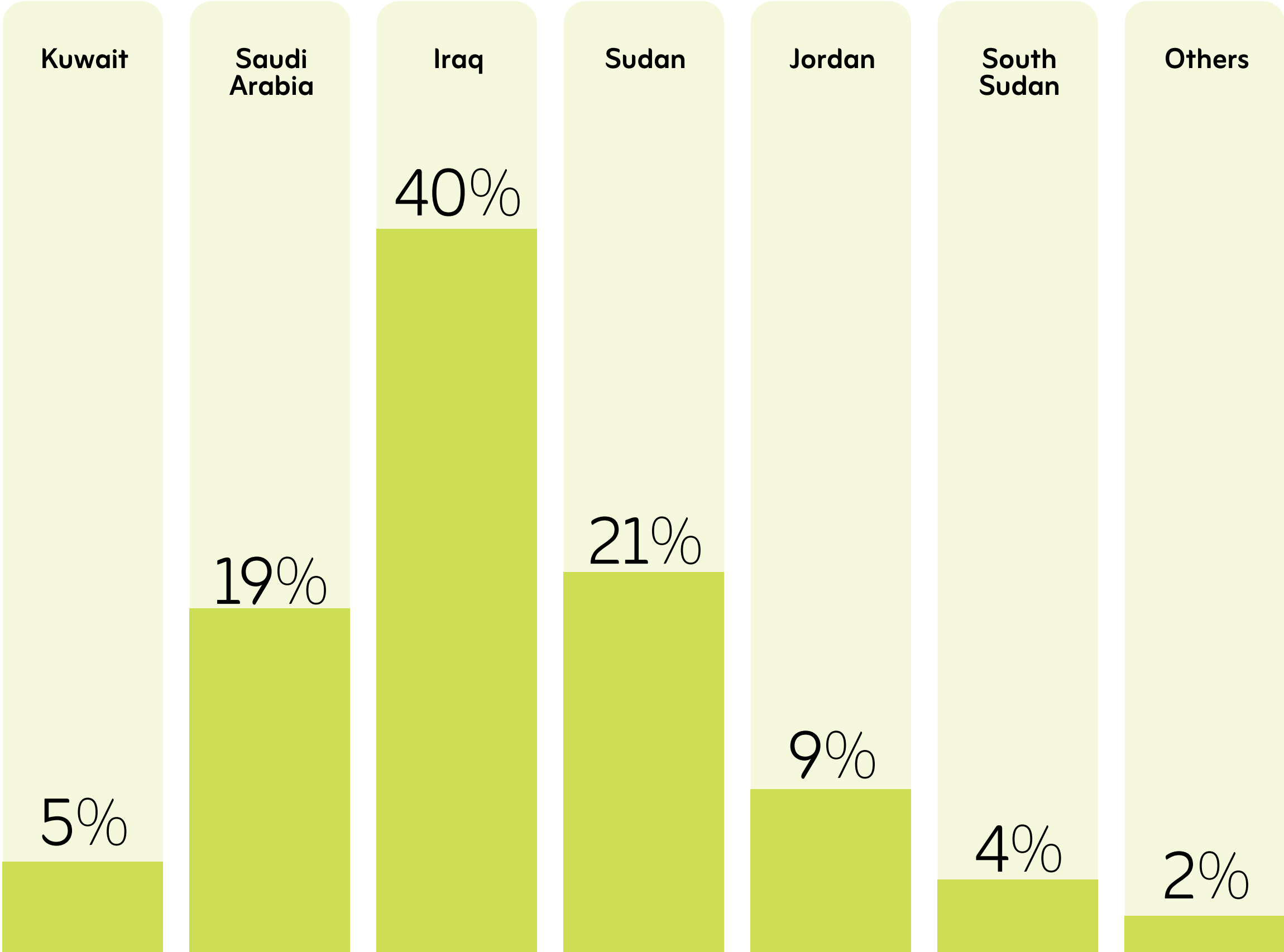


Zain Group’s total customer base reached 49 million by end of December 2024. Zain’s overall customer base decreased by 3% compared to 2023, with growth in Iraq, KSA, Jordan & South Sudan that compensated for the steep decline in Sudan, largely attributed to war, social unrest and the displacement crises in the country.

The Group customer base remains dominated by the markets with the largest populations and highest potential for growth acquisition - namely, Iraq (19.7m), Sudan (10.1m), and KSA (9.3m), in order of contribution.

	Ownership (%)	Active Customers (000s) December 31, 2024	Active Customers (000s) December 31, 2023	Y-O-Y Change
Kuwait	19%	2,626	2,706	-3%
Saudi Arabia	5%	9,288	8,892	4%
Iraq	40%	19,697	17,920	10%
Sudan	21%	10,122	14,178	-29%
Jordan	9%	4,152	3,964	5%
South Sudan	4%	1,921	1,744	10%
Others	2%	1,204	2,706	4%
Total	100%	49,010	50,566	-3%

OpCo Contribution





People & Purpose



Major Milestones

The ZYxGreenSkills initiative was launched to promote the development of green skills among youth, essential for fostering sustainable practices and addressing environmental challenges. Subsequently several awareness seminars and workshops were introduced across Zain's 8 operations in 2024 to expound on the challenges posed by climate change and encourage innovative solutions.

1,750 Zain employees enrolled in the Inclusion, Diversity, and Equity University (IDEU), an online university established in 2023 in collaboration with IE University in Spain. A total of 7,650 certificates have been earned to date, with over 118,600 training hours spent while completing the courses.

The company introduced its Innovation Policy, aimed at cultivating a culture that promotes creativity and innovative problem-solving. This initiative aligns closely with Zain's vision to become the leading provider of innovation, empowering our customers to embrace a digital lifestyle.

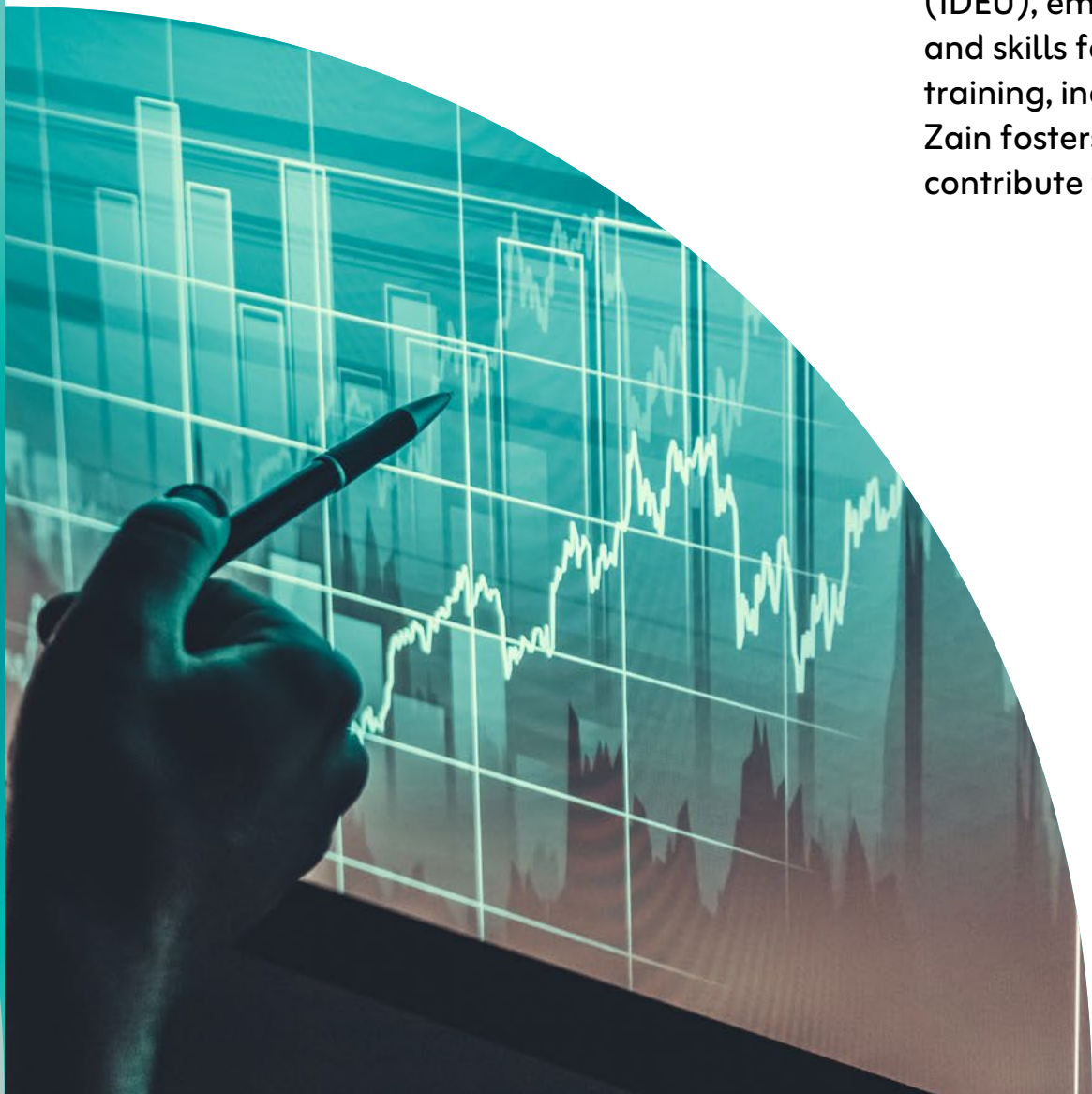
To cement purpose within the ethos of the organization, Zain decided to integrate purpose within the role of the Chief Human Resources Officer thus formally becoming Chief Purpose Human Resources Officer (CPHRO). The role of the CPHRO is to integrate the company's purpose and employee purpose to guide, inspire, and drive human centricity and innovation across the organization.

Zain launched a company-wide culture transformation program called 'UNITY', which infuses Purpose and Customer Centricity into the company's DNA, by prioritizing a human-centric approach and enhancing collaboration. The program serves as a tool designed to encompass Zain's purpose-driven customer experience strategy.

In 2023, the MENA region faced a youth unemployment rate of 24.4 percent, nearly double the global average, highlighting the significant challenges young people encounter in securing decent jobs. Additionally, the region recorded the world's lowest youth employment-to-population ratio at 18.5 percent, indicating that less than one in five young people of working age were employed underscoring the urgent need for sustainable employment pathways and skills development, particularly as digital transformation continues to reshape regional economies. To address the contextual challenge and provide sustainable value, Zain's commitment to empowering young people and addressing skills mismatches in an evolving workforce is central to its talent strategy. By offering training programs and career development resources tailored to the MENA context, Zain is building a workforce equipped to navigate the region's fast-evolving digital ecosystem.

To stay competitive in a telecom industry increasingly influenced by digital innovation, Zain is refining its approach to workforce management. This includes an increased emphasis on reskilling and upskilling to bridge any gaps between the demands of digital transformation and employees' current skill sets. Globally, 75% of jobs will require advanced digital skills by 2030, and Zain is committed to preparing its teams accordingly. Through proactive engagement and skill-building initiatives, Zain aims to ensure that its employees remain aligned with the industry's evolution, and emerging technologies while retaining top talent in a highly competitive market.

Continued education is increasingly essential for a competitive, motivated workforce in today's fast-evolving industries. Zain embeds talent development into its strategies, prioritizing employee well-being and learning to keep its workforce agile and resilient. This commitment is highlighted in the 2024 enrollment boost in Zain's Inclusion, Diversity, and Equity University (IDEU), empowering employees with knowledge and skills for ongoing growth. Through focused training, inclusive practices, and continuous learning, Zain fosters a workplace where all can thrive and contribute to the company's overall success.





Employee Breakdown

In 2024, while Zain's overall workforce remained stable, the ongoing conflict in Sudan significantly affected part-time and temporary employees. The company remains dedicated to supporting those impacted by this crisis, prioritizing their safety and well-being by providing complimentary mental health services and actively monitoring the situation in the region.

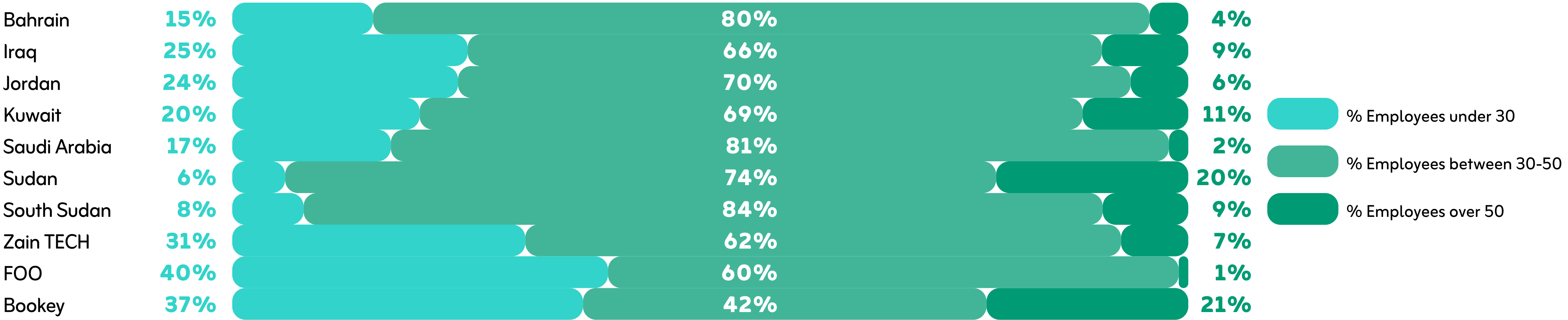
For transparency and accuracy purposes in this report, ZainTECH, Bookey, ZOI, and FOO are included as separate entities.

- Employees All Contract Types - does not include outsource employees
- New hire % - Female hires are calculated by dividing no. of new-hire females with total no. of full-time employees
- Employee Turnover % - Males is calculated by dividing employee turnover - males with total no. of full-time employees
- Staff with disabilities are people with disabilities who have a long-term physical, mental, intellectual, or sensory impairment, which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others
- Employee Turnover % - Females is calculated by dividing employee turnover - Females with total no. of full-time employees
- Return to work rate is defined as employees returning to work after their respective maternity or paternity leave

	BAHRAIN	IRAQ	JORDAN	KUWAIT	SAUDI ARABIA	SUDAN	SOUTH SUDAN	ZAIN TECH	FOO	BOOKEY	TOTAL
Full-Time Employees	230	1,289	1,329	1,602	1,744	768	160	646	183	19	7,970
Part-Time and Temporary Employees	211	1,582	462	5	0	0	0	15	4	4	2,283
Employees (All Contract Types)	441	2,871	1,791	1,607	1,744	768	160	661	187	23	10,253
Full-Time Male Employees	155	919	933	1,325	1,403	407	126	493	147	10	5,918
Full-Time Female Employees	75	370	396	277	341	361	34	153	36	9	2,052
% Of Full-Time Male Employees	67%	71%	70%	83%	80%	53%	79%	76%	80%	53%	74%
% Of Full-Time Female Employees	33%	29%	30%	17%	20%	47%	21%	24%	20%	47%	26%
New Hires - Male Employees	14	147	47	183	100	4	11	121	10	4	641
New Hires % - Males	6%	11%	4%	11%	6%	1%	7%	19%	5%	21%	9%
New Hires - Female Employees	17	55	20	44	60	8	8	49	1	1	263
New Hires % - Females	7%	4%	2%	3%	3%	1%	5%	8%	1%	5%	4%
Total New Hires	31	202	67	227	160	12	19	170	11	5	904
Total New Hire %	13%	16%	5%	14%	9%	2%	12%	26%	6%	26%	13%
Staff with disability	0.0%	0.2%	0.5%	0.3%	2.0%	1.0%	1.0%	0.6%	0.0%	0.0%	0.6%
Employee Turnover - Males	9	135	83	365	121	33	5	164	17	2	934
Employee Turnover - Males %	3%	10%	6%	23%	7%	4%	3%	25%	9%	11%	10%
Employee Turnover - Females	3	57	45	73	56	18	0	47	1	0	300
Employee Turnover - Females %	1%	4%	3%	5%	3%	2%	0%	7%	1%	0%	3%
Total Turn Over	12	192	128	438	177	51	5	211	18	2	1,234
Return to Work Rate After Parental Leave - Females	100%	100%	100%	100%	71%	75%	100%	83%	100%	100%	93%
Return to Work Rate After Parental Leave - Males	100%	100%	100%	100%	99%	63%	100%	100%	100%	N/A	96%
Retention Rate After Still Working for Zain One Year After Return From Parental Leave - Females	100%	100%	100%	94%	100%	100%	100%	67%	100%	N/A	96%
Retention Rate After Still Working for Zain One Year After Return From Parental Leave - Males	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	100%



Employee Age Structure Table



Achieving Results through Engagement

To cement purpose within the ethos of the organization, Zain decided to integrate purpose within the role of the Chief Human Resources Officer thus formally becoming Chief Purpose Human Resources Officer (CPHRO). The role of the CPHRO is to integrate the company’s purpose and employee purpose to guide, inspire, and drive human centricity and innovation across the organization. As a forward looking entity focused on creating value and meaningful impact for all, Zain is proactively embedding its business, sustainability, and IDE agenda, enriching the company’s sense of agency and purpose.

Following Zain’s 2022 Group-wide Employee Engagement Survey, the results were analyzed and communicated via the Human Resources department in 2023. Informed by employee feedback, the company has been developing a Group-wide reward and recognition framework in 2024, designed to reflect employees’ values, strengthen engagement, and embed a culture of appreciation across the organization.

Internal Innovation

ZAINIAC, an internal platform launched in 2017, is dedicated to unlocking the potential of Zain employees by fostering innovation and supporting the incubation and development of business ideas. The platform continues to play a key role in driving internal innovation through a range of structured programs, speaker sessions, and competitions designed to nurture and advance innovative concepts.

Throughout the year, ZAINIAC organized several activities aimed at encouraging employees to submit ideas that address organizational challenges and contribute to innovation from within.

- The ZAINIAC online platform continued to serve as a dynamic space where employees submit ideas, collaborate with peers, and engage in sprints and events, all aimed at enhancing and streamlining Zain’s internal innovation processes.

- ZAINIAC’s vanguard was established by the IDE department to form an active innovative group of employees from diverse backgrounds to assess, mentor, and develop the implementation of the submitted ideas on the ZAINIAC platform. The platform has 52 active members where each Zain operation has their own committee for the assessment of the submitted ideas against criteria related to innovation, ideation, operations, and nature conservation.
- **Nature & Me:** As part of its ongoing campaign from 2023, the ZAINIAC team launched several initiatives under the Nature & Me campaign, which tackles climate change and engraining a sustainable mindset.
 - › **Recycling Competition:** As part of Zain Bahrain’s ongoing commitment to addressing climate change, the company launched a recycling competition to raise awareness and reduce single-use plastic usage across its offices. Recycling bins were placed strategically on

each floor, initiating a two-week competition designed to encourage employee participation. This initiative achieved notable success, with an impressive 308 kilograms of plastic collected in partnership with The Global Community Shapers – Budaiya Hub.

- › **No Plastic, Fantastic!** Zain Jordan launched the No Plastic, Fantastic! initiative to support Zain’s sustainability strategy to reduce plastic consumption. The company eliminated plastic cutlery in its cafeteria and cups in cafes, taking a significant step toward minimizing single use plastic waste.
- › **Zain Green Rewards:** In September 2024, Zain launched a trade-in service to incentivize eco-friendly practices. Customers can exchange old devices for rewards, such as discounts and free minutes on new plans. In preparation for the launch, branch employees were trained to ensure they were equipped to guide customers through the trade-in process and explain the program’s benefits. As of now, 17 devices have been traded-in as part of the initiative.

	Q1	Q2	Q3	Q4
Active users on the ZAINIAC platform	Target: 600 users Actual: 1,310 users	Target: 1000 users Actual: 936 users	Target: 750 users Actual: 782 users	Target: 500 users Actual: 532 users
Ideas Submitted	Target: 80 ideas Actual: 113 ideas	Target: 100 ideas Actual: 136 ideas	Target: 220 ideas Actual: 204 ideas	Target: 100 ideas Actual: 112 ideas
Ideas in Progress	Target: 5 ideas Actual: 16 ideas	Target: 5 ideas Actual: 13 ideas	Target: 5 ideas Actual: 28 ideas	Target: 5 ideas Actual: 26 ideas

FINDING INNOVATION from within

Zain generates ideas from the minds of its employees with its ZAINIAC program.

Here are three recent examples:

Zain Empower

Post the successful launch of the MAX Internet plans, Zain Kuwait introduces the "MAX" activation assistance feature, offering personalized help in activating entertainment platforms, thereby enhancing customer service and streamlining the activation process.

Hybrid E-Shop

Zain Jordan implemented interactive screens in stores to promote Zain’s E-Shop, boosting sales and enhancing customer engagement by allowing direct orders with convenient home delivery. This initiative, led by Luai AlZiq, aims to boost sales and customer satisfaction.

No Plastic, Fantastic!

Zain Jordan transitioned from plastic to biodegradable wooden cutlery, aligning with its environmental goals and potentially reducing costs while enhancing brand reputation and employee engagement. This initiative was led by Luma AlRuwaitan and will be scaled across other operations.



Strategy: A New Era

In collaboration with Group Strategy, ZAINIAC launched its 2024 'Strategy' campaign. The campaign introduced an enhanced Rewards program, a robust Vanguard Framework for the efficient evaluation and assessment of submitted ideas, and a Group-wide Innovation Policy, designed to foster a culture of innovation and streamline the process for ideation and execution.

The campaign’s first phase centers on unlocking Zain’s strategic potential through Purposeful Artificial Intelligence (AI) and cutting-edge B2B/B2C strategies. Innovators were challenged to leverage AI as a tool to enhance user empowerment and operational efficiency, alongside developing adaptable B2B and B2C strategies that anticipate technological advancements and evolving consumer needs. As consumer preferences evolve with rapid digital transformation, there is an increased demand for seamless interactions, enhanced data privacy, and sustainable business practices. During this phase, 165 ideas were submitted, with 20 currently under active development.

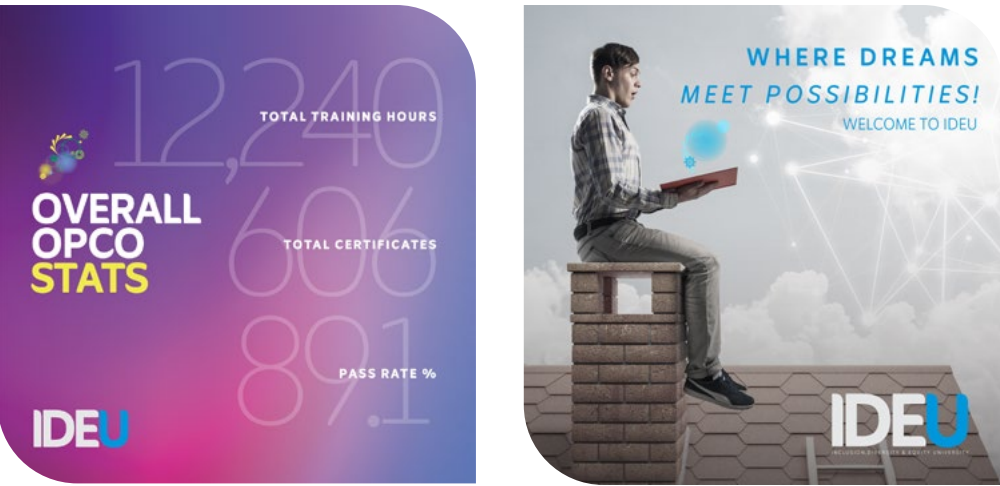
Among the campaign’s accomplishments is the Inclusive Language AI Tool, an in-house solution developed by Zain Jordan’s Data Analytics & AI team. This tool fosters inclusive communication by identifying and addressing biased or exclusionary language in company-wide communications, policies, and documents, reinforcing Zain’s commitment to diversity and inclusivity.

The second phase of Zain Group’s Strategy campaign focused on fostering intrapreneurship through the launch of the “BE A CEO” initiative, which empowers employees to transform their groundbreaking ideas into successful ventures. Designed to encourage innovation and entrepreneurship within the workforce, the campaign invited employees to present business ideas with the potential to become Zain’s next

breakthrough venture. Submissions were made via the ZAINIAC platform, resulting in 85 proposals, five of which were shortlisted for mentorship and refinement. These candidates received personalized guidance to enhance their pitches, which were evaluated by ZAINIAC’s Investment Committee. The winning idea will receive funding, along with incremental paid leave to focus on launching the start-up, underscoring Zain Group’s commitment to nurturing entrepreneurial talent and expanding its portfolio through innovative initiatives.

BE A CEO

	Q1	Q2	Q3	Q4
Ideas Submitted	Target: 30 ideas Actual: 31 ideas	Target: 30 ideas Actual: 56 ideas	Stopped collecting ideas in Q2	Stopped collecting ideas in Q2
Ideas in Progress	Assessment was done in Q2	Target: 5 ideas Actual: 5 ideas	Target: 1 idea Actual: 2 ideas	Target: 1 idea Actual: 1 idea



Training and Development

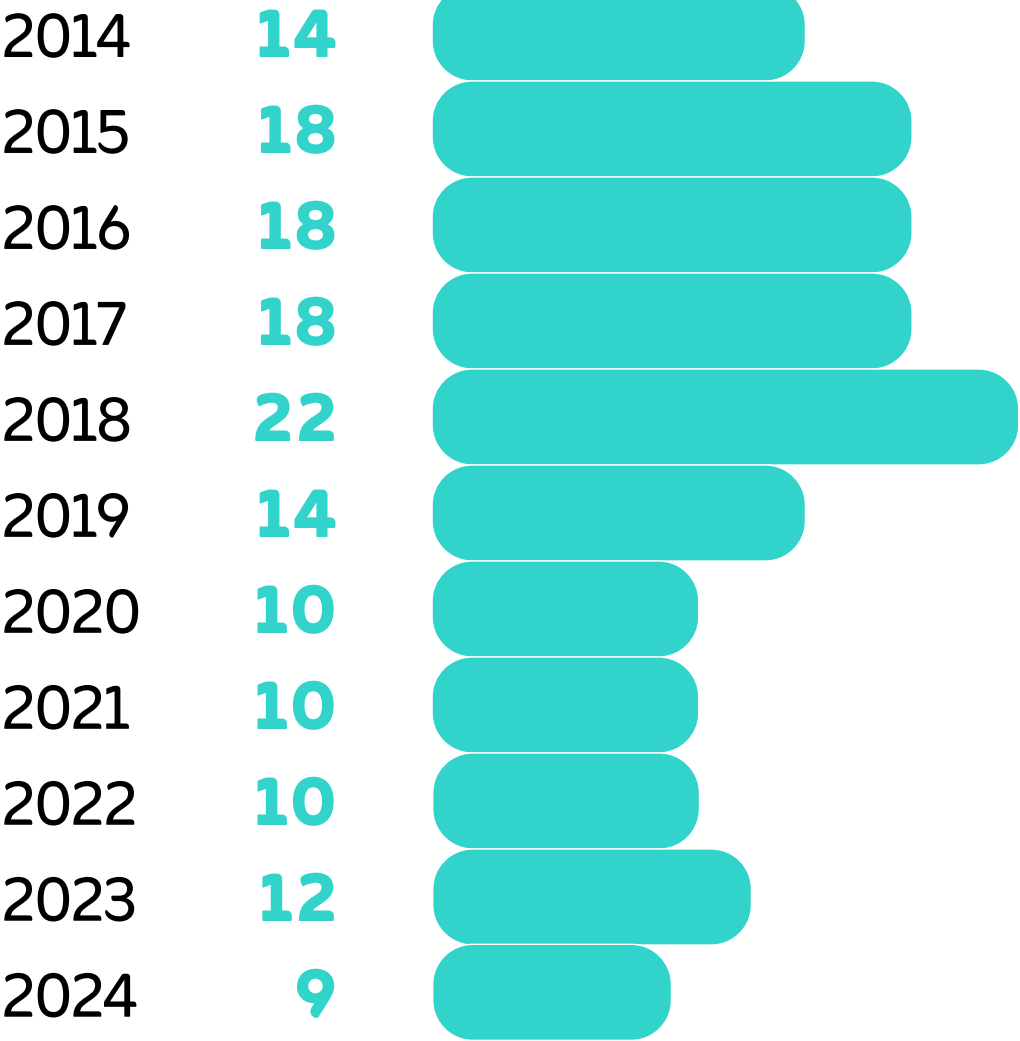
Zain remains committed to enhancing employee skills through comprehensive upskilling and reskilling initiatives, fully aligned with the company’s corporate strategy. This commitment lays the groundwork for Zain’s focus on employee skill development, acknowledging that a capable workforce is vital for promoting innovation and adopting sustainable practices across the organization.

For example, during the challenging times of the COVID-19 pandemic in 2020, Zain Kuwait launched the Coursera Initiative to support employees’ continuous learning and development. Coursera, a leading global online learning platform, offers access to over 5,000 courses across diverse fields, including technical, commercial, human resources, and marketing. Designed to accommodate employees working in shifts, the program ensures 24/7 availability through Coursera’s mobile application, enabling users to save their learning accomplishments and explore new topics on-the-go. To enhance the learning experience, Zain Kuwait has introduced blended academies, combining in-house training with e-learning programs. The initiative has already achieved notable engagement, with 105 employees completing 193 courses by end of 2024, reflecting the organization’s commitment to fostering growth and adaptability among its workforce.

As a people-first business, to further its organizational mission and ambitious business targets, as well as to continue the company’s commitment to enhancing internal capabilities for the advancement of personal and career growth, Zain established its IDEU in collaboration with IE University in Spain. This partnership extends the opportunity to 2,000 talented Zainers to participate in an inclusive online Digital Transformation program that also offers the opportunity to attain a master’s degree. During the year, 1,750 employees commenced their digital transformation journey with high pass rates, solidifying

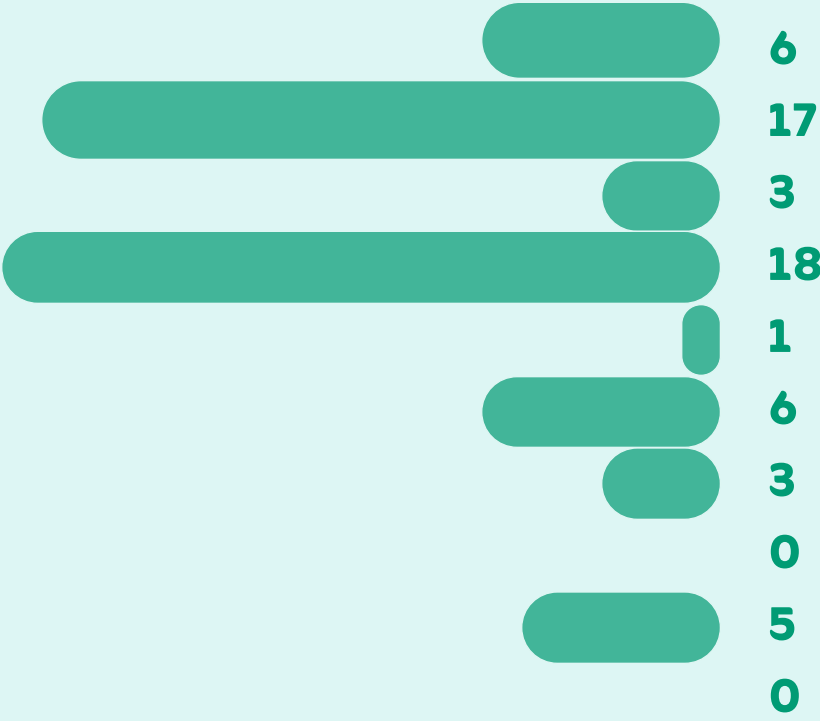
the initiative’s impact and success. To date, the average course pass rate is 92%; 800+ active students are pursuing a master's degree; 7000+ certificates have been attained; and 118,600 training hours completed. Under IDEU, an additional 21 candidates graduated from Zain & IE University’s Talent Onboarding Program. This 13-month intensive program equipped participants with a comprehensive understanding of business fundamentals, supplemented by specialized tracks in big data and digital transformation, ensuring they are well-prepared to meet the demands of the modern business landscape.

Year-on-Year Average hours of training per employee

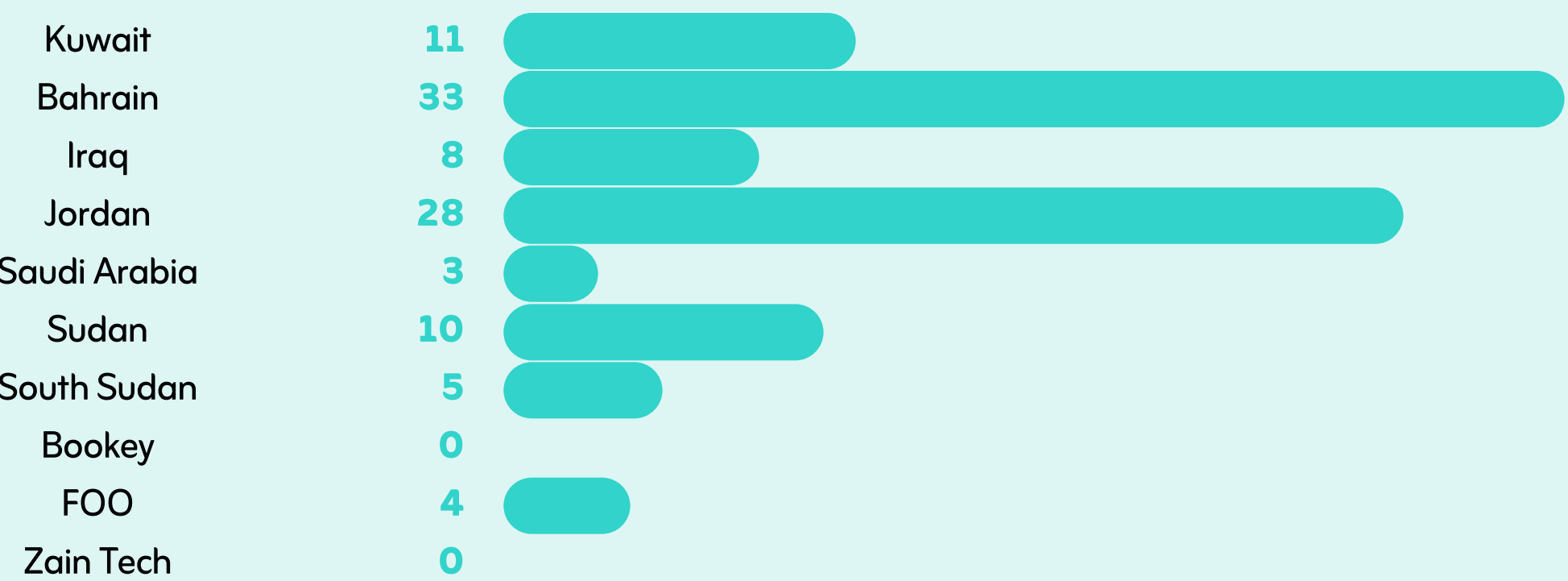




Average Hours of Training per Employee - Males



Average Hours of Training per Employee - Females



Zain Youth (ZY)

The ZY pillar is aimed at nurturing young employees at Zain, focusing on their professional development by enhancing their skills and providing the necessary resources to help them reach their full potential at the workplace. ZY has introduced several programs over the years, including:

- **Generation Z Program:** This initiative onboards fresh graduates annually. Graduates receive training, development through rotational programs, and work on strategic projects. Top achievers are offered MBA sponsorships at the UK's LBS, with notable successes including a former graduate and Forbes 30 Under 30, Yousef Al Musaileem, now serving as CEO at Tamam, a Zain Fintech company in Saudi Arabia.
- **ZY Counsel:** A select group of promising young talents known for their strategic thinking and innovative problem-solving abilities. This Counsel functions as an advisory and change management team, addressing significant operational challenges.
- **ZY Mavericks:** Highly-skilled youth individuals who receive exclusive certifications to train their peers through the ZY Learn program. They provide support across various projects within the organization.
- **ZY Learn:** A dynamic, interactive training program designed by youth for youth, focusing on soft and technical skills. This initiative addresses skill gaps

and prepares young employees to become future leaders.

Generation Z Program

2024 marks the ninth cycle of the Generation Z program, where six university graduates were selected to participate in a year-long intensive development program designed to strengthen their leadership, internal entrepreneurship, and innovation skills. The program was divided into four main modules: Speak Up and Pitch Up, Strategic Innovation, Green Skills, and Digital World.

Key highlights from this year's program include:

- The six candidates rotated across various departments based on their preferences, including Corporate Sustainability, Group Strategy, Finance, and Technology.
- Completing a 125 km hike over four days in the mountainous terrain of the UK as part of a Mental Toughness Challenge, while also raising funds for Palestinians in Gaza.
- The participants completed three courses at IE University: Customer Centricity, Marketing, and Innovation & Entrepreneurship.
- Spent two weeks with Omantel's Innovation Labs, exploring the company's innovation culture through activities such as idea filtering and hackathon preparation, and pitched six innovative ideas to streamline Omantel's operations.
- Generation Z participants visited Ericsson Imagine

Studio in Sweden for a two-day program, where they explored the next generation of 5G technology and gained insights into the pivotal role AI would play in transforming networks. The visit also highlighted Ericsson's sustainability goals and its strategic vision for a connected and sustainable future.

Zainers 2.0, 2016

Focused on a rotation in different departments throughout Zain Group with an emphasis on conducting research on various digital verticals

Generation Z, 2017

Centered on establishing a business, gaining entrepreneurial skills, and studying innovative trends in the market

Generation Z, 2018

The theme for this cycle was to enhance digital skills such as coding and agile project management in addition to a focus on self-growth and development

Zainers 2.0, 2019

Enhancing corporate culture and teamwork when managing projects were the main focus of this edition

Generation Z, 2020

This cycle incorporated three themes: corporate culture, leadership styles, and future trends

CODE 7, 2021

Focused on developing digital skills for future data analysts. This cycle addressed topics that included big data, artificial intelligence, and sustainable innovation

ZTwenty Two

2022 Geared towards cultivating internal entrepreneurs, innovators, and new thinkers who already possess a mindset capable of supporting Zain's strategic goals

GenZ, 2023

Focused on cultivating entrepreneurial mindset that supports Zain's 4WARD strategy

GenZ, 2024

Focused on supercharging leadership skills and training for long successful corporate careers.

ZY Counsel

ZY Counsel is a key initiative under ZY, comprised of promising young Zain employees, aimed at developing their strategic thinking and innovative problem-solving skills. The Counsel functions as an advisory group, offering insights to address operational challenges raised to the respective operating company CEOs.

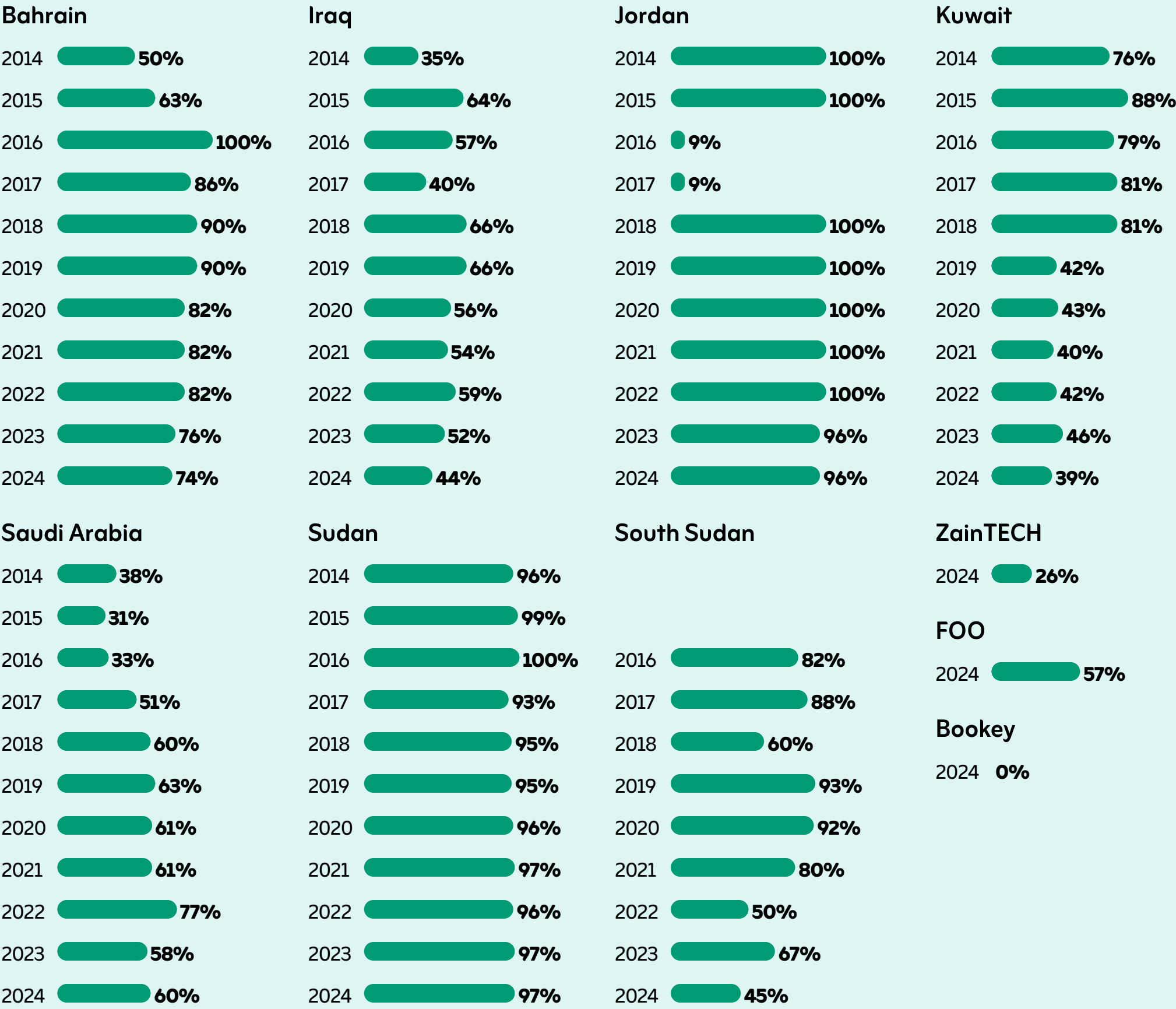
This year, the Counsel underwent training in Design Thinking, Leadership in Practice, and Agile Project Management, equipping its members with the ability to contribute more effectively to Zain's strategic objectives. In 2024, the training program for ZY Counsel was launched and a total 35 youth across Zain's operations participated, except for South Sudan.



Supporting Local Talent

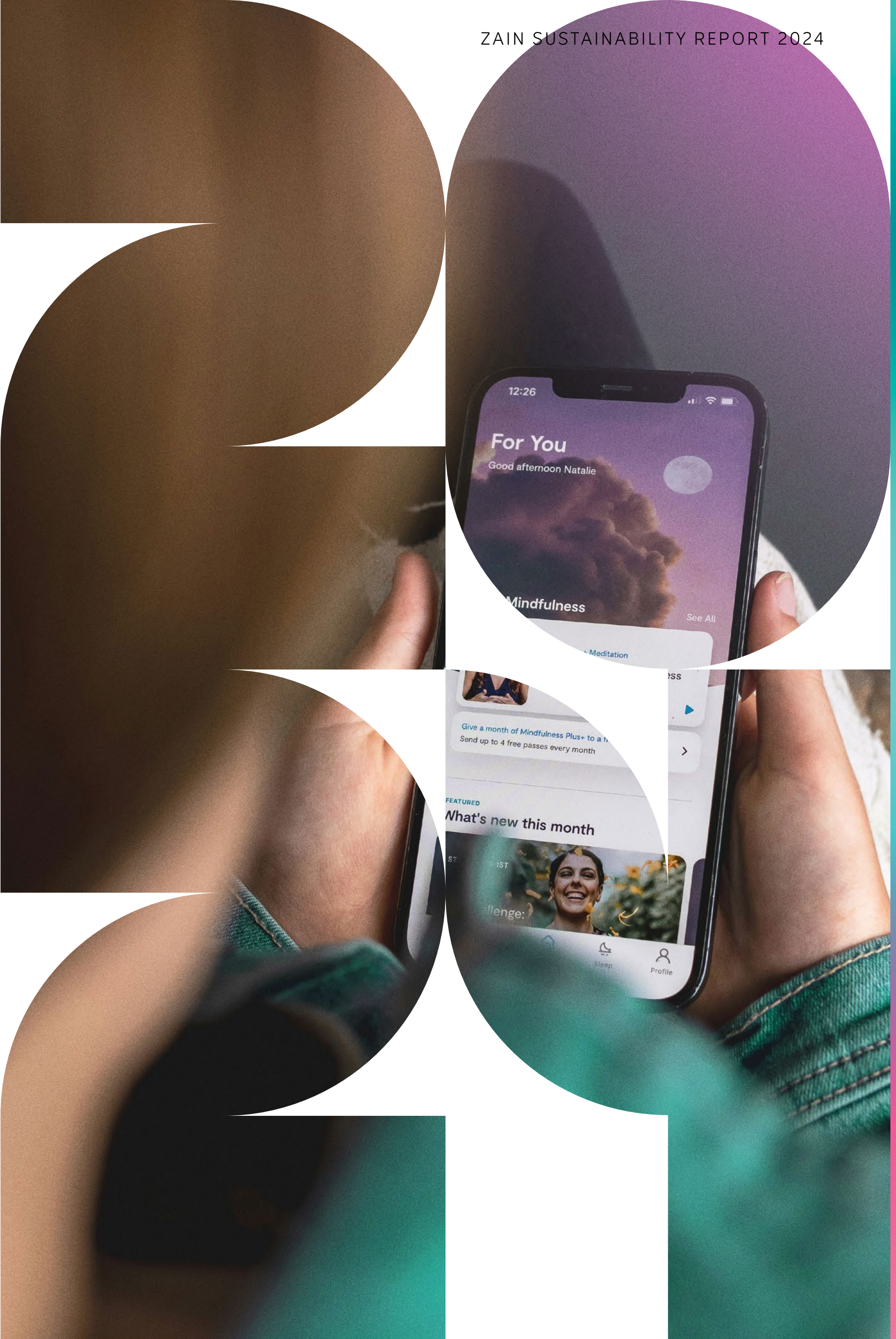
In 2024, the average percentage of local in senior management positions was 54% across all markets. The tables below demonstrate the year-on-year percentages of senior management (defined as the top two management levels) comprised by locals in each operation.

Supporting Local Human Capital: Percentage of Locals in Senior Management



The table below represents the percentage of total local employees in each of our operating markets:

Operations	Percentage of local employees
Kuwait	35%
Bahrain	87%
Iraq	96%
Jordan	99.4%
Saudi Arabia	81%
Sudan	99.9%
South Sudan	96%
Bookey	0%
FOO	67%
ZainTECH	57%





Creating a Diverse and Inclusive Culture

WE ABLE

As part of Zain's ongoing commitment to inclusion, the WE ABLE initiative empowers employees with disabilities (PWDs) by creating an environment that supports their growth, visibility, and leadership potential. In 2024, Zain launched an updated and comprehensive disability inclusion strategy under the WE ABLE initiative, aimed at fostering a more inclusive, accessible, and equitable environment for employees with disabilities (PWDs). Central to this new strategy is 'The Masters,' an Employee Resource Group (ERG) composed of employees with disabilities, who are empowered to advocate for their needs, shape their experiences, and take leadership roles within Zain.

The Masters ERG focuses on enabling PWDs to lead the conversation on inclusion while influencing key decisions that shape the organization. Through its activities, it promotes accessibility, learning, leadership, and visibility.

The new WE ABLE strategy is driven by four key impact areas:

- 1. A co-created and published disability inclusion strategy that reflects the input of Zain's PWD community.
- 2. Ensuring that accessibility is embedded into Zain's decision-making processes so that products, services, and experiences are inclusive by design.
- 3. Building a supportive community where PWDs can share experiences, develop skills, and assume leadership roles.
- 4. Amplifying the voices of PWDs, increasing their visibility within the organization, and celebrating their contributions.

Key Activities and Goals:

- Conducting regular surveys to gauge employee satisfaction and inform areas for improvement.
- Offering training in accessibility best-practices for all employees.
- Regularly auditing products and services to meet accessibility standards and tracking related incidents.
- Launching mentorship programs and workshops focused on leadership and career development for PWDs.
- Creating communication channels to allow PWDs to voice concerns and contribute ideas, with initiatives to publicly recognize their contributions.

Zain's long-term vision is to create a fully inclusive and accessible environment for PWDs by 2030. This goal is driven by three core objectives:

1. Achieve a 2% increase in the number of PWDs hired within the Zain workforce.
2. 90% groupwide compliance with CRPD standards across existing facilities, guided by ILO and CRPD benchmarks for physical accessibility.
3. Attain full digital accessibility compliance based on global accessibility standards.
4. Increase the promotion rate of employees with disabilities by at least 50% by 2030, ensuring career growth and progression opportunities across all operations.
5. Ensure all operations meet or exceed their respective country-based quotas.
6. Develop a data-driven foundation for disability inclusion, utilizing scientifically based insights to guide all plans and strategies.

Through this new strategy, WE ABLE aims to create an inclusive environment where every individual is empowered to thrive, and where the contributions of PWDs are fully recognized and celebrated.



Partnerships in collaboration with WE ABLE:

BeMyEyes

In 2024, Zain partnered with BeMyEyes, a global application that connects blind or low vision individuals with sighted volunteers through live video calls. Volunteers assist users with everyday tasks, providing real-time visual support for activities such as reading labels, navigating environments, and more, fostering greater independence for those with visual impairments. With this partnership, Zain is the first long-term volunteering partner in the Middle East. This collaboration supports Zain's commitment to accessibility and inclusion, offering employees opportunities to make a direct impact.

During the partnership, Zain will host up to 16 volunteering events organized by BeMyEyes, allowing up to 100 employees to participate per event. This is intended to help individuals with blindness or low vision through the BeMyEyes platform. In addition, a promotional blog post will profile a Zain employee living with blindness, and a communications campaign will highlight Zain's involvement across BeMyEyes' media channels.

PurpleSpace

In 2024, WE ABLE partnered with PurpleSpace, the world's only networking and professional development hub for disabled employees; network and resource group leaders; and allies across all sectors and trades. The partnership between WE ABLE and PurpleSpace is designed to enrich the experience of Zain's ERG, known as 'The Masters,' by offering monthly coaching sessions and roundtable discussions. These sessions provide the ERG leader with invaluable opportunities to connect with international ERG counterparts, share insights, and learn best practices. Through this collaboration, WE ABLE aims to enhance 'The Masters' ERG journey, fostering growth, inclusivity, and shared learning across the Zain community.





BE WELL

Following its revamp in 2023, BE WELL focused on promoting wellness and well-being through its pillars:

- Mental Health
- Movement
- Mindfulness, and Me.

The BE WELL initiative offers Zain employees different avenues to foster a mindful and productive working environment such as free counselling and therapy sessions, hosting of well-being workshops, and providing access to wellness programs.

In 2024, Zain expanded the program by offering the following to its employees:

- Expanded employee health insurance coverage in six of its operations to include a comprehensive range of Psychology and Psychiatry services. By offering access to mental health services, Zain aims to provide employees with essential resources for managing stress, anxiety, and other mental health challenges, fostering a healthier and more supportive workplace environment.
- Maintained its collaboration with the Kuwait Counseling Center (KCC), providing unlimited therapy sessions, with 740 sessions conducted in 2024, reaching 304 attendees. This includes sessions conducted for the children of Zain Sudan employees. As a premier psychological facility in the region for over 10 years, KCC offers a broad range of services, including psychoeducation, comprehensive assessments, therapy, and specialized training. Zain Sudan employees and their children accounted for the highest number of sessions, highlighting Zain's dedication to supporting its employees and the families of Zain Sudan employees during the ongoing civil war.
- Under the BE WELL program, Zain also provides access to Tuhoon, the first Arabic self-help mobile app in the region, with 701 Zain employees

subscribing in 2024. In addition, the program offered quarterly webinars on different topics including: “Heart Intelligence: Cultivating Happiness and Collective Peace,” which drew 80 participants; “Rising Above Burnout,” in which there were 246 attendees; and “Building Resilience,” which attracted 163 participants across Zain operations.

- 291 employees participated in Global Wellness Day 2024, which centered on reconnecting with nature.
- Zain marked World Mental Health Day by giving all employees a day off on October 10th in recognition of the importance of mental well-being.
- Zain operating companies hosted several wellness related events for employees with a focus on the importance of physical health to foster a holistic approach to well-being including: Walkathons attracting 234 participants Group-wide; exercise challenges such as the Ramadan Steps Challenge that counted 895 participants Group-wide ; meditation sessions; dealing with difficulties at the workplace; and workshops on the effects of physical well-being and mental health.
- Mental health challenges, including stress, anxiety, burnout, and depression, can arise without warning and significantly impact employee well-being and productivity. Addressing these concerns is crucial as Zain aims to maintain a healthy, engaged workforce, which directly contributes to having a robust organization. To address these concerns and provide timely support, Zain implemented the Mental Health First Aider (MHFA) certification program in partnership with the Lighthouse Training Clinic in Dubai. In 2024, 23 employees were certified as MHFAs, ensuring that trained personnel are available within teams to offer immediate assistance and guidance to colleagues in need. This initiative reflects Zain's ongoing and long-term commitment to fostering a supportive and mentally healthy workplace environment.





WE

Established in 2017, the Zain’s Women Empowerment initiative (WE) was initiated with one main target to be achieved by the end 2030: increase women leadership to 30%. Women currently represent 18% in junior/ middle management and 14% in top management. Over the years notable achievements include a 100% increase in C-Level female representation and revised maternity and paternity policies.

The initiative is divided into different areas that include:

- WE STEM: An internal pool of experts working towards supporting tech-related competitions, mentorships, and development programs.
 - › In celebration of International Women’s Day, the WE Hackathon was held at Zain Jordan's offices in March 2024. 24 talented employees across Zain’s operations and Omantel were represented with an intent to leverage AI and develop innovative solutions that advance Zain’s IDE strategy within the evolving future of the workplace. The ideas presented were centered on reducing bias in position ranking and simplifying recruitment processes to empower the workforce.
- WE Disrupt: Transforming mindsets through Inclusion, Diversity and Equity training tackling Inclusive Leadership, Inclusion Competencies, Microaggressions and Biases.
 - › 23% of Zain employees received training. Zain aims to reach 50% of employees to receive the training by the end of 2025.
- NOVA: This initiative sets a strategic plan dedicated to bridging skill and gender gaps for women in tech. Firstly, detailed survey and focus groups were conducted targeting women in tech to design a

comprehensive plan to address the areas of focus. The results showed that only 19% of women in Zain have roles related to the technical industry. The results of this initiative will set out a two-year strategy designed to tackle inclusion, mindset shift, and leadership development.

The current progression of Zain’s status of its five-year target of women in leadership positions is found below:

WE 2030 Targets		
	Current Status	2030 Target
Groupwide Headhunt	70:30	60:40
Middle Management	82:18	70:30
Leadership Level	86:14	70:30

- WE achievement: Best Workplace for Women – 2024: Zain Group was honored in the Fast Company Middle East’s Best Workplaces for Women 2024 list as the winner of the large Enterprise category. This is an acknowledgement that signifies more than just an award as it validates Zain’s unwavering commitment to IDE in all aspects of the business. The inaugural edition of the Best Workplaces for Women recognizes companies across the region that are empowering women by creating an inclusive environment. The presence of Zain Group on the list, among other reputable companies, is an affirmation of the company’s corporate leadership in this area.

WHAT IS NOVA?

NOVA IS A 2-YEAR PROGRAM CRAFTED TO HELP WOMEN IN TECH UNLOCK THEIR POTENTIAL AND ADVANCE THEIR CAREERS. INSPIRED BY THE BRILLIANCE OF A STAR SHINING BRIGHTEST, NOVA IS YOUR OPPORTUNITY TO SHINE!

WHAT NOVA OFFERS

- COACHING RETREAT
SET YOUR CAREER GOALS WITH EXPERT GUIDANCE.
- UPSKILLING MODULES
10 SELF-PACED COURSES TO GROW YOUR SKILLS.
- PERSONALIZED COACHING
TAILORED SESSIONS FOR TOP PARTICIPANTS.
- POWERFUL NETWORK
CONNECT WITH 200 WOMEN FROM 8 OPCOS.

WHY JOIN?

GAIN ESSENTIAL SKILLS, CONNECT WITH A SUPPORTIVE COMMUNITY, AND DRIVE CHANGE IN TECH!

CALL TO ACTION

READY TO SHINE? LEARN MORE AND APPLY THROUGH THE LINK IN OUR BIO.
LET'S LIGHT UP THE FUTURE TOGETHER!

YOU'VE UNLOCKED NOVA!

Elevate your career.

WE

WE 2030

Group Headcount
60 : 40

Middle Management
70 : 30

Leadership Level
70 : 30





Gender Pay Gap

Zain continues to measure its remuneration ratios across its markets to ensure it tracks and manages any gaps across the different hierarchal levels in its operations.

Average Remuneration Ratio Females to Males by Employee Category

	Bahrain	Iraq	Jordan	Kuwait	Saudi Arabia	Sudan	South Sudan	Zain TECH	FOO	Bookey
Employee Level 1 (Executive Management)	79%	120%	181%	79%	67%	791%	N/A	89%	N/A	N/A
Employee Level 2 (Senior Management)	86%	78%	72%	98%	73%	230%	93%	108%	92%	194%
Employee Level 3 (Middle Management)	85%	89%	94%	108%	87%	185%	N/A	90%	92%	N/A
Employee Level 4 (Team Leaders)	N/A	111%	105%	N/A	87%	72%	N/A	N/A	N/A	N/A
Employee Level 5 (Professionals)	100%	95%	93%	116%	89%	73%	97%	58%	89%	101%
Employee Level 6 (Team Members)	N/A	87%	100%	N/A	91%	N/A	91%	N/A	N/A	38%





Sustainability Agenda





Zain's Operating Context:

Zain's operating context has an impact on the company's ability to create sustainable value for itself, society, and the environment. To ensure growth, it is crucial to tap into the interconnectivity that Zain's products and services deliver, as there is a direct correlation with development and prosperity across the communities in which Zain operates. Throughout its 40 years of operations, Zain proactively addressed market challenges and societal deficits, tailoring its strategic approach to its markets' unique and dynamics. The company's human centric approach allows it to continue to prosper and innovate to remain sustainable and thrive in an ever-changing world.

The MENA region presents a complex landscape of socio-economic and environmental challenges, including rapid population growth, climate vulnerabilities, and geo-political shifts that could lead to spillover effects impacting neighboring countries. The rise in conflict results in economic hardship and the widening of existing inequality gaps, further destabilizing the region. Operating within this dynamic context, Zain addresses regional needs through tailored strategies that promote growth, economic development, and environmental accountability. By aligning its activities with both local and global sustainability goals and trends, Zain integrates sustainability into its core operations to drive long-term value.

According to the World Economic Forum's 2024 Global Risk Report, misinformation, and disinformation are considered leading risks, followed by extreme weather events and societal polarization. To combat misinformation, governments are increasing regulations, including requiring that AI-generated content be clearly labeled. As a sector leader, Zain proactively follows and aligns policy developments and regulatory changes to navigate the rapidly changing environment.

Youth unemployment is another grave challenge facing the region, as the rate currently stands at 22.2% for men and 42% for women. Several factors contribute to this trend, including financial and legal illiteracy, and barriers to women and people with disabilities entering the labor market. Youth have the potential to play an instrumental role in advancing sustainable development across the region, which calls for a greater focus on reskilling, upskilling, and resilience-building to ensure youth are market-ready as they enter the workforce.

The World Bank highlights the most significant climate change threats for the region entail:

- High dependency on fossil fuels and limited renewable energy uptake

- Climate change's severe impact on water and food security
- The depletion of natural resources forcing displacement
- Highly urbanized cities increasing stress on the availability of resources
- The MENA region being the smallest recipient of international climate finance

Such challenges place high importance on a multi-sectoral approach in addressing climate change impacts holistically. Governments should lead the way by implementing policies and regulations, in addition to setting financial incentive mechanisms. The private sector's commitment and alignment to net-zero ambitions and ensuring decarbonization of operations can have profound impacts across the value chain. Contributions from research and educational institutions, through scientific findings, can guide the development of climate change legislation and frameworks, while civil society advocates for climate action by raising public awareness and engaging with local initiatives. Together, these efforts form a comprehensive approach to combating the severe impacts of climate change.

Operating within this dynamic context, Zain Jordan has played an active role in addressing the humanitarian crisis in Gaza, further demonstrating Zain's commitment to community welfare and resilience in times of need. Under its sustainability agenda, Zain Jordan has supported the following initiatives:

- Donated 90 devices of Negative Pressure Wound Therapy (NPWT), delivered in collaboration with the Royal Medical Services to Jordanian field hospitals operating in Gaza.
- Zain Jordan provided a cash donation of 100,000 Jordanian Dinars, along with an additional 17,700 JOD contributed by Zain employees.
- Launched a fundraising campaign enabling Zain customers from all subscription plans to donate through their lines. This campaign raised 9,024

- JOD, used to deliver urgent humanitarian aid, purchase medical supplies, and provide food for Palestinian hospitals in Gaza, in cooperation with the Jordan Hashemite Charity Organization.
- Offered 1,000 free minutes of calling time to all Zain Jordan postpaid and prepaid customers to connect with Jawwal Network in Palestine. During the promotion, there was an increase of 2 million calls during the promotion, totalling 5 million calls to Gaza during the promotion.
- Symbolically changed the name of Zain's network to "GAZA," as announced in the company's statement, to reflect pride and solidarity.
- Enabled donations through "Zain Cash" in collaboration with Jordan Hashemite Charity Organization, allowing users to contribute via the Zain Cash app. Through the campaign Gaza: Together We Support It, donations reached 500,000 JOD to aid relief and reconstruction efforts in Gaza.
- Provided a 10,000 JOD donation in collaboration with the Kuwaiti Association for Student Assistance to support students from Gaza and refugee camps enrolled in various Jordanian universities.
- Donated 25,000 JOD through Zain Cash to prepare food parcels for families in Gaza as part of Tkiyet Um Ali's campaign.
- The 2024 winter campaign, supported by Zain and its employees, collected a total of 1,227 blankets and 1,301 jackets for refugees in Gaza.



Sustainability Agenda

As Zain marks its fifth year of implementing its Corporate Sustainability (CS) Strategy, the company continued to focus on achieving the goals outlined in its CS agenda. In 2024, Zain placed increased attention on evaluating how its actions create, sustain, or erode value across its business functions. This reflects the company's ongoing commitment to integrating purpose into all its business decisions while considering the impact of its activities from short, medium, and long-term perspectives.

Zain's Mission

To provide Meaningful Connectivity leading to equitable systemic change and empower Zain's communities.

Zain's Vision



Safeguard the planet



Address societal challenges through the core business



Enable an inclusive digital society



Build the youth of the future

Strategic Pillars

Climate Change

Decarbonize our business & transition towards net-zero by 2050



6 CLEAN WATER AND SANITATION



7 AFFORDABLE AND CLEAN ENERGY



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



11 SUSTAINABLE CITIES AND COMMUNITIES



13 CLIMATE ACTION

Operating Responsibly

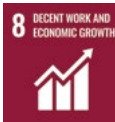
Embed ESG across our value chain



3 GOOD HEALTH AND WELL-BEING



4 QUALITY EDUCATION



8 DECENT WORK AND ECONOMIC GROWTH



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



16 PEACE, JUSTICE AND STRONG INSTITUTIONS



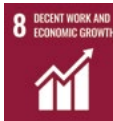
12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Inclusion

Reduce the digital inequality gap



5 GENDER EQUALITY



8 DECENT WORK AND ECONOMIC GROWTH



10 REDUCED INEQUALITIES



17 PARTNERSHIPS FOR THE GOALS

Generation Youth

Build resilience across our communities by targeting 16 million children and youth



3 GOOD HEALTH AND WELL-BEING



4 QUALITY EDUCATION



8 DECENT WORK AND ECONOMIC GROWTH



17 PARTNERSHIPS FOR THE GOALS





Climate Change

Awareness of the challenges posed by climate change in the Middle East and North Africa (MENA) region has grown exponentially in recent years. The devastating impacts of climate change, ranging from high temperatures and extreme weather events to declining water resources and eroded coastal land, have imposed their urgency on both citizens and governing bodies. In the MENA region, addressing climate change requires the consideration of societal vulnerabilities and governance challenges, which involves an inclusive approach that integrates resource management, strengthened infrastructure, transparency, and collaboration.

Building on the foundation of its five-year Corporate Sustainability (CS) strategy launched in 2020, Zain made significant progress in 2024. This year marked a pivotal step in the company's journey toward establishing long-term sustainable value for all stakeholders by accelerating its climate action agenda. The company had its net-zero targets officially verified and approved by the Science-Based Targets initiative (SBTi), reflecting its commitment to a net-zero economy. Zain's dedication to transparently reporting its environmental performance by disclosing it to CDP ensures accountability and ongoing improvement. As part of the transition towards Net Zero, investments in renewable energy sources were expanded across its operations, alongside implementation of energy efficiency programs across facilities, and water risk assessments were conducted to prioritize water security. The company is also taking steps to protect biodiversity by integrating ecosystem preservation initiatives, including efforts to reduce habitat destruction and promoting conservation practices across its operational sites.

These efforts underscore Zain's unwavering commitment to integrating climate action into its CS strategy, paving the way for a resilient, low-carbon future while addressing the pressing environmental challenges facing the MENA region.

Network and Energy Consumption Transition

Strategic Approach & Communications

Waste Management & Circular Economy

1. Network and Energy Consumption Transition

Zain implements the Greenhouse Gas (GHG) protocol guidelines for the inventory of its emissions. The emissions reduction pathway is set based on SBTi recommendations:

- Emissions reductions are in absolute value
- A minimum reduction of 4.2% annually
- 10 years for near-term target, and a long-term and net-zero target by 2050
- All the relevant gases such as CO₂, CH₄, N₂O and HFCs are considered in the inventory
- Renewable energy deployment is the main mitigation strategy
- Carbon capture and storage solutions will be utilized as a supplement to support the abatement of residual emissions

Boundary:

All of Zain's operating companies are included in the organizational boundary for its emissions inventory. Across Zain's footprint, Tower emissions from the energy consumption of the company's active equipment whether through its majority owned TASC Tower entity or through its individual operating entities is Zain's responsibility and therefore included in the boundary.

Emissions Baseline:

Zain's initial baseline used for setting its emissions targets was 2022 but was revised to 2020 based on the outcome of the SBTi's approval of the company's science-based targets (SBTs) which is also in line with the ICT sectorial decarbonization pathway.

Emissions reductions:

The reductions in CO₂ emissions are estimated based on the type and quantity of energy-efficient solutions planned to be deployed in each entity. These reductions are affected by network expansions and the addition of new sites. The balance between the emissions reductions through energy efficient solutions and the emissions resulting from network expansions constitute the net emission reduction.

Targets calculations:

The net emissions reduction of all entities is compared to the baseline emissions to derive the CO₂ emissions target for the company.

Zain's Target:

Zain's emissions targets have been formally approved by the SBTi and are formulated as below:

- **Overall net-zero Target:** Zain commits to reach net-zero greenhouse gas emissions across the value chain by 2050.
- **Near-Term Targets:** Zain commits to reduce absolute Scope 1 and 2 GHG emissions by 42% by 2030 from a base year of 2020.
- **Long-Term Target:** Zain commits to reduce absolute Scope 1 and 2 GHG emissions by 90% by 2050 from a base year of 2020.
- Zain also commits to reduce absolute Scope 3 GHG emissions by 90% within the same timeframe.



2020 – 2050 CO₂ Emissions targets for Scope 1 and Scope 2

Type of Targets	Scopes / Targets	2020	2030	2050
Absolute / 1.5°C	Scope 1 emissions (t CO ₂ e)	401,370.94	232,795.14	52,178.22
	Scope 2 emissions (t CO ₂ e)	730,328.98	423,590.81	94,942.77
	Scope 1 + Scope 2 emissions (t CO ₂ e)	1,131,699.92	656,385.96	113,169.99
	Reduction Targets		42.0%	90.0%

CO₂ Emissions Reduction (2020-2024)

Scopes	Base Year (2020)	Reporting Year (2024)	Reduction to Date	% near-term SBT Progress
Scope 1 emissions (tCO ₂ e)	401,370.94	330,115.86	17.8%	42.3%
Scope 2 emissions (tCO ₂ e)	730,328.98	662,079.80	9.50%	22.2%
Scope 1 & 2 emissions (tCO ₂ e)	1,131,699.92	992,195.66	12.33%	29.3%

Bahrain

In 2024, Zain Bahrain moved 159 indoor sites to outdoor and connected three sites to the grid, resulting in a 20.6% emissions reduction year-on-year. As half of the country is covered by urban areas, while the remaining land is predominantly occupied by oil fields, Zain’s towers in this landscape are primarily linked to the grid, posing challenges for the integration of renewable energy sources. However, Zain Bahrain successfully conducted a trial of renewable power solutions at one of its mobile sites paving the way for similar deployments within the next five years. Bahrain’s compact size introduces spatial constraints that make the potential of installing a solar farm a noteworthy challenge.

Iraq

Iraq made slight improvements to its electricity grid, addressing challenges posed by aging infrastructure and inadequate maintenance, which has historically led to frequent outages. Notably, Zain Iraq in coordination with TASC Towers deployed 622 solar and hybrid solutions resulting in the noticeable reduction by 29.4% in CO₂ emissions from the base year of 2020.

Jordan

In 2024, Zain Jordan continued to benefit from its grid decarbonization efforts that took place in 2023, with over 86% of its electricity consumption being sourced from renewable power sources, as part of the green allocation agreement with the local government. Furthermore, Zain Jordan in coordination with TASC Towers continues to optimize the power features of its mobile technologies to optimize the use of energy across its 2G, 3G, 4G and 5G networks.

Kuwait

Zain Kuwait in coordination with IHS Towers achieved a remarkable reduction of its CO₂ emissions per base station by 32.5% year-on-year. This accomplishment is attributed to strategic climate change mitigation efforts such as the deployment of inverter-based cooling solutions, the installation of 151 efficient DC power solutions, and the installation of solar panels at the company’s headquarters.

Zain Kuwait operates in a country with one of the highest temperatures globally and faces a potential exponential increase in energy consumption if temperature rises persist, leading to a surge in CO₂ emissions. However, the company is committed to engaging with stakeholders to initiate discussions and advocate for necessary reforms with the local government to accelerate the deployment of renewable energy solutions on a large scale and explore opportunities to position itself to capitalize on the transition to renewable energy sources in the near future. At the end of 2024, Zain acquired the outstanding 70% of IHS Kuwait Limited, an independent licensed Tower Company that owns 1,675 sites and manages an additional approximate 700 sites in Kuwait. Zain now owns 100% of IHS Kuwait.

Saudi Arabia

Zain KSA faced several challenges in its quest to implement its climate change mitigation plans. The reliance on on-grid power, generated predominantly by traditional sources such fuel and gas poses a challenge on the transition to a net-zero economy. Zain made a strategic decision to transfer 80% of its sites' passive infrastructure to LATIS, an infrastructure management company (TowerCo), through which Zain KSA explored the deployment of renewable power solutions to align with emissions reduction goals. Zain worked with LATIS for the trial of green power solutions such as battery and solar hybrid systems. Two battery hybrid systems have been successfully implemented, and 44 more units have been delivered to the country for deployment during the first quarter of 2025. LATIS plans to deploy 75 more units of battery hybrid systems in 2025 which brings the total plan to 119 battery hybrid systems to be deployed in 2025. Zain plans to replace the shelters with energy efficient outdoor cabinets on sites not transferred to LATIS to cut emissions. Furthermore, the Kingdom's escalating summer temperatures contributed to heightened power consumption and subsequent CO₂ emissions amplifying the need for sustainable solutions. Addressing these challenges is pivotal in steering Zain towards a greener and more efficient future.

Sudan

In the aftermath of the 2023 political conflict in Sudan, the electricity network faces considerable challenges stemming from damaged infrastructure and disruptions. The country relies predominantly on natural gas, oil, and diesel generators for power generation. Zain faced challenges in the Western region of Sudan, being one of the most impacted regions. Over 161 DG-battery hybrid solutions, backup battery extensions, and site electrification solutions were installed during the year. This was important not only for grid reliability, but it also supported in optimizing energy consumption across mobile sites.

South Sudan

South Sudan continued to experience devastating flooding and excessive rainfalls during 2024, impacting 43 mobile sites. Due to the unstable grid in the country, Zain relies on diesel generators for its base stations. However, tremendous effort was made to mitigate climate change, including moving 14 sites from grid to battery-hybrid solutions, shifting 39 sites from off-grid DG and DG-battery hybrid to solar solutions, deploying 28 outdoor solutions and installing 27 DG-battery hybrid solutions resulting in an 8.4% reduction in CO₂ emissions year-on-year.



Throughout 2024, Zain continued to install energy efficient solutions across its operating markets, including the following:

Improvements to Energy Efficiency and Site Optimization (units)

Operating Countries	Smaller size Generators	Outdoor (BTS/Power) Solution	Free Cooling Solutions	Grid Connection	Upgrade to more efficient DC Power solution
Bahrain		159		4	
Iraq			18		
Kuwait	17	2	2	7	151
Saudi Arabia				161	
Sudan				20	
South Sudan		28			
Total	17	189	20	192	151

Driving Operational Efficiency:
Our Sites (Tower Sharing Program)

Operating Countries	Zain Sharing Others' Sites	Others Sharing Zain's Sites
Bahrain	55	
Saudi Arabia		16
South Sudan	14	

Hybrid Solutions Installations

Operating Countries	DG-Battery Hybrid Solution	Solar Hybrid Solution
Bahrain	1	
Iraq	546	116
Kuwait		8
Saudi Arabia	2	
Sudan	25	
South Sudan	27	39
Total	601	163
	764	

CO₂ Emissions – Scope 1 & 2 / Operation (Sites/ Data Centers/HQ)

Descriptions	Units	Bahrain	Iraq	Jordan	Kuwait	Saudi Arabia	Sudan	South Sudan	Total
Scope 1 - Fuel	liters	961,391	40,001,869	219,034	12,166,485	52,855,309	9,025,149	3,288,336	118,517,573
Scope 2 - Electricity	KWh	45,968,704	187,959,187	135,368,063	182,182,355	620,620,179	14,615,211	3,015,452	1,189,729,152
Scope 1 - Fuel	CO ₂ e KG	2,576,528	107,205,010	566,580	32,606,180	141,652,228	24,187,399	8,812,740	317,606,666
Scope 1 - Refrigerants	CO ₂ e KG	387,108	5,515,438	844,791	2,662,906	2,314,046	784,902	0	12,509,191
Scope 1 emissions	Kg CO ₂	2,963,636	112,720,448	1,411,371	35,269,086	143,966,274	24,972,301	8,812,740	330,115,856
Scope 2 emissions	Kg CO ₂	32,118,333	124,616,941	7,481,561	111,969,275	378,888,620	4,467,870	2,537,202	662,079,802
Total Scope 1 & 2 emissions	Kg CO ₂	35,081,969	237,337,389	8,892,932	147,238,361	522,854,894	29,440,171	11,349,942	992,195,658
Baseline-year 2020 Absolute Decrease/ Increase in Emissions [Year 2020 vs 2024]	%	-5.70%	-29.40%	-85.80%	24.20%	-2.10%	-63.40%	50.70%	-12.33%

The reported Scope 1 – Fuel and Scope 2 – Electricity consumption data is based on a combination of actual consumption as well as an estimation-based methodology.

Energy Consumption Data Collection Methodology

Descriptions	Units	Bahrain	Iraq	Jordan	Kuwait	Saudi Arabia	Sudan	South Sudan
Scope 1 - Fuel	liters	Actual	Estimation-based	Actual	Actual	Estimation-based	Actual	Actual
Scope 2 - Electricity	KWh	Estimation-based	Actual	Actual	Estimation-based	Actual	Actual and Estimation-based	Actual

Spending related to CO₂ reduction initiatives – 2024

Initiatives	Total Direct Cost (USD)	Total Indirect Cost (USD)
Zain sharing Others' sites	0	417,765
Outdoor (BTS/Power) solution	869,496	869,496
DG-Battery Hybrid solution	2,210,000	0
Smaller size Generators	0	61,201
Solar Hybrid solution	4,197,400	0
Grid Connection	923,622	0
Free Cooling system	36,000	0
Total	8,236,518	1,348,463



Consolidated energy consumption and CO₂ emissions

Descriptions	Units	Total
Scope 1 - Fuel	Liters	118,517,573
Scope 2 - Electricity	KWh	1,189,729,152
Scope 1 - Fuel	CO ₂ e KG	317,606,666
Scope 1 - Refrigerants	CO ₂ e KG	12,509,191
Scope 1 emissions	Kg CO ₂	330,115,856
Scope 2 emissions	Kg CO ₂	662,079,802
Total Scope 1 & 2 emissions	Kg CO ₂	992,195,658
Baseline-year 2020 Absolute Decrease/ Increase in Emissions [Year 2020 vs 2024]	%	-12.33%

Notes:

- For the conversion from liters of fuel to KWh, we considered that 1 liter = 3KWh on the basis that 1 liter produces 10KWH with diesel generator efficiency of 30% as recommended by the GSMA
- DG-battery hybrid solutions usually lead to approximately 50% savings on fuel consumption
- Estimate of KWh for solar system is based on the data provided by Zain Jordan as per site monitoring and management solution. 750KWh is produced per site on average

Scope 3 Emissions

Category name	Total tCO ₂ e
Category 1: Purchased goods and services	119,836
Category 2: Capital goods	129,517
Category 3: Fuel- and energy-related activities (not included in Scope 1 or Scope 2)	135,647
Category 4: Upstream transportation and distribution	1,142
Category 5: Waste generated in operations	11,956
Category 6: Business travel	1,030
Category 7: Employee commuting	10,410
Category 8: Upstream leased assets	102
Category 9: Downstream transportation and distribution	9,151
Category 10*: Processing of sold products	-
Category 11: Use of sold products	17,175
Category 12: End-of-life treatment of sold products	1,554
Category 13: Downstream leased assets	35,167
Category 14*: Franchises	-
Category 15: Investments	28,530
TOTAL Scope 3 Emissions	501,218
Y-O-Y Change (2023-2024)	0.93%

Scope 3 exclusions:

- Category 10: Processing of Sold products. This Category includes emissions from products that need further processing. Most of Zain products do not need further processing, hence this category is evaluated as being non-relevant for our business.
- Category 14: Franchises. This Category includes emissions from a telecommunication operator's operation of franchises not included in Scope 1 or 2. A franchise is a business operating under a license to sell or distribute another company's goods or services within a certain location. The life-cycle emissions associated with manufacturing or constructing franchises are considered optional by the GHGP [GHGP-2]. This is typically not a significant emission Category for telecommunication operators.





2. Strategic Approach & Communications

Climate Change Awareness

Zain is dedicated to addressing climate change and helping our customers build a sustainable mindset. To achieve this, the company set a goal to reach 40% of its customers on matters regarding climate change by 2025. This commitment aligns with the overall sustainability plan and follows CDP principles.

Zain introduced different campaigns and initiatives across its various markets to spark conversations around climate change and motivate action. To evaluate the effectiveness of these efforts, the organization conducts surveys with customers before and after their participation.

Group-wide

During 2024, Zain launched a thought-provoking video titled “Shadows of the Past” to raise awareness about climate change and the consequences of excessive plastic waste and related consumption. The video tells the story of a young girl reminiscing about her childhood memories of a pristine lake, juxtaposed with the environmental degradation she witnesses as her future self in 2050. This compelling narrative underscores the urgent need for collective action to combat climate change and reduce plastic waste, ensuring a sustainable future for generations to come. The campaign reflects the company’s commitment to leveraging impactful storytelling to inspire environmental responsibility and drive meaningful change.

Kuwait

In 2024, Zain Kuwait continued the success of its influential “Badilha Bil Zain” campaign, initially launched in 2023. This social media initiative was designed to raise awareness about the growing issue of excessive waste generation in Kuwait. The focus of the campaign was on educating the public on how to adopt more environmentally friendly practices to reduce their environmental footprint and mitigate their contribution to climate change. Key climate change topics addressed included waste reduction and the reduction of GHG emissions. Emphasizing the importance of sustainable living, the campaign encouraged individuals to choose reusable items over disposable alternatives. The movement has garnered significant attention, reaching an audience of 18.3K on Instagram.

Jordan

Jordan is one of the world’s most water-scarce countries, with renewable water resources amounting to less than 100 cubic meters per person annually—well below the global water scarcity threshold of 1,000 cubic meters (World Bank, 2021). Recognizing this critical challenge, in 2024, Zain Jordan reinforced its commitment to national sustainability efforts by supporting the Royal Scientific Society's initiative for remote water quality monitoring. As part of this initiative, data transmission lines and "Real Static IP" services were provided to 13 strategically located stations across critical surface water sources across the Kingdom. These monitoring stations, equipped with advanced automated devices, continuously collect water samples for physical and chemical analysis. The results are transmitted in real-time on an hourly basis—via Zain's network - to a centralized database. This seamless data transmission enables efficient, real-time monitoring, facilitating timely decision-making by stakeholders from relevant ministries and institutions.

Zain's technological support enhances the speed, ease, and reliability of water quality monitoring, contributing to the sustainable management of one of Jordan's most vital resources.

Bahrain

In 2024, Zain Bahrain launched an impactful campaign during the holy month of Ramadan, titled "Beafalina Nanmu" aimed at raising awareness on reducing carbon footprints. The campaign consisted of four informative videos, each addressing a specific aspect of sustainability under climate change:

1. Encouraging eco-friendly transportation through walking, cycling, and carpooling.
2. Sharing practical water management tips for sustainable living at home.
3. Highlighting the importance of minimizing food waste and its environmental impact.
4. Promoting the benefits of supporting local Bahraini produce, fostering community support.

The campaign successfully engaged a wide audience, reaching an impressive number of 47,138 users on Instagram, further solidifying Zain Bahrain’s commitment to environmental responsibility and public awareness.

Iraq

In 2024, Zain Iraq partnered with Hala Startup to plant 850 native Acacia trees in Baghdad, with 600 planted in the city center and 250 in a public garden. This initiative aims to enhance green spaces, reduce CO₂ emissions, and promote climate awareness, fostering a sustainability mindset among local communities throughout the city.

Sudan

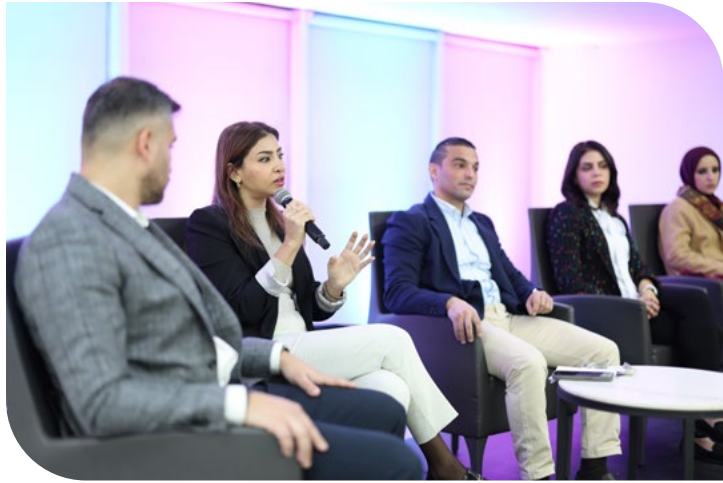
During 2024, Zain Sudan launched sanitation initiatives across the country to address waste accumulation and environmental degradation in safe areas where many Sudanese displaced by the war have sought refuge.

Environmental Sanitation Campaign in Port Sudan, Red Sea State - January 2024

Approximately 500 volunteers, including employees from Zain and Hawatif Company participated in cleaning multiple large neighborhoods, the main market, and roads. Partners in this campaign included the NGO “Beeaty” the Higher Council for the Environment, the Red Sea State Cleaning Authority, the Red Sea Centre for Environmental Activities, students from the Faculty of Natural Resources at the Red Sea University, and other individuals who joined voluntarily.

White Nile State – Al-Duwaym City - July 2024

The environmental sanitation campaign in White Nile State aimed to enhance conditions within displacement centers. Focused on 20 shelter sites in Al-Duwaym, the campaign operated under the slogan “Prevention - Health - Safety.” Implemented in collaboration with the Duwaymi Voluntary Initiative, it engaged 130 volunteers from youth associations, organizations, and government entities. The initiative successfully reached approximately 3,000 people.



ZYxGreenSkills

As part of Zain's empowerment of youth with the essential green skills needed to address the impacts of climate change, Zain re-launched the ZYxGreenSkills campaign in 2024, following its initial awareness launch in 2023.

The re-launch was led by insights from a Group-wide survey and focus groups conducted in 2023 to assess the youth's understanding of green skills and to gather feedback on the development of the program. These surveys and focus groups, which included responses from 1,348 young adults, provided critical guidance for refining the initiative to better meet the needs and interests of young participants. In response to the feedback, Zain operations organized workshops and awareness sessions in collaboration with local sustainability-focused businesses and influencers. These events emphasized the growing importance of green skills and demonstrated how every job has the potential to become a green job, further reinforcing the message of sustainability, innovation, and environmental responsibility. In this context, the potential of circularity is also significant, as it highlights the need for creating closed-loop systems that optimize resource use, reduce waste, and promote a regenerative economy. Through these efforts, Zain continues to equip young people with the skills necessary to drive positive changes across communities and the world. This initiative also reflects Zain's commitment to fostering eco-conscious leaders who will play a pivotal role in building a resilient and environmentally responsible society.

Bahrain

118 responses from Surveys

An engaging session titled "Demystifying Green Skills" in collaboration with the Global Shapers Community Budaiya Hub was conducted at Zain Bahrain Tower, attended by 45 attendees.



Kuwait

201 responses from Surveys

Zain Kuwait successfully hosted a comprehensive session on the importance of green skills, led by Eng. Yasmeen AlKandari, co-founder of a leading green building and sustainability consultancy in Kuwait. The session focused on key topics, including the importance of sustainability, competitive market positioning through sustainability skills, and the strategic impact of sustainability in shaping the future. Attended by 10+ participants, the session also addressed public policy initiatives and green projects relevant to Kuwait, providing localized insights into sustainability efforts. Eng. AlKandari highlighted the country's strategic goals to diversify its economy and promote a sustainable future, emphasizing the need to align green skills with national agendas and training programs.

Iraq

443 responses from Surveys

Zain conducted 12 awareness sessions about green skills in Baghdad, Basra, and Erbil. A total of 311 youth attended, including 194 internal staff and 117 external attendees. Additionally, an interactive session with the Ministry of Environment, Ministry of Agriculture, UNDP, and Makers of Baghdad raised awareness about the importance of green skills in combating climate change. This was followed by an internal session that highlighted the importance of integrating sustainability into our daily tasks as well as the impact of green skills on addressing climate change. The session successfully engaged 10 employees, significantly enhancing their awareness and commitment to sustainable practices.

Jordan

280 responses from Surveys

As part of the ZYxGreenSkills initiative, Zain held a comprehensive awareness session on critical climate change topics, attended by 37 Zain employees under the age of 27. The session began with an in-depth presentation on Zain's commitment to climate action through its CS strategy, focusing on the company's net-zero goals and the environmental impact of CO2 emissions. Participants were also briefed on Zain's transition to green energy, highlighting ongoing investments in renewable energy solutions to reduce its carbon footprint.

Additionally, the session explored the principles of the circular economy, emphasizing sustainable resource use and waste reduction. The session concluded by emphasizing the vital importance of biodiversity in maintaining ecological balance and supporting sustainable development. Expert speakers from Zain and partner organizations provided valuable insights. Nature conservation expert, Hussam AlZoubi, discussed the preservation of natural ecosystems; Circular Economy Specialist, Eng. Haneen Abu Hamra, explored strategies for resource efficiency; career coaching consultant, Dana Gharaibeh, examined the importance of green skills in the evolving workforce; and Climate Action Manager, Eng. Ahmad Ismail, reviewed Zain's climate action efforts. The event was organized in partnership with the Ministry of Environment and the Royal Society for the Conservation of Nature (RSCN), reinforcing Zain's collaborative approach to advancing sustainability in Jordan.

Saudi Arabia

97 responses from surveys

Zain KSA did not hold any sessions in 2024 and plans to launch its activities in 2025.

Sudan

20 responses from surveys

Due to the unstable situation in Sudan, the team was unable to proceed with the initiative.

South Sudan

189 responses from surveys

Zain South Sudan did not achieve the intended outcomes of the ZYxGreenSkills survey in 2024. As a result, the team is undertaking a strategic restructuring to better align with the program's objectives and ensure future success.





Water Management

Each of Zain’s operating locations faces unique challenges related to climate conditions and water scarcity. Recognizing this, Zain determined that setting tailored targets for each operation would deliver more effective outcomes. This approach ensures that the targets are relevant to the specific environmental conditions of each location while enhancing their feasibility, ultimately leading to more impactful and efficient results. This strategy builds on the comprehensive water management plan implemented in 2023, aimed to address water consumption within Zain’s operations and improve overall water efficiency.

During this period, the company conducted detailed measurements and evaluations across its operations to establish accurate benchmarks. This analysis was done with the understanding that Kuwait, Bahrain, Jordan, and KSA are classified as highly stressed water areas, where the demand for water significantly exceeds the available supply. This classification was based on recognized global water stress indices, such as the Water Stress Index from the World Resources Institute (WRI), which assesses the ratio of water demand to supply. In contrast, Iraq, Sudan, and South Sudan are considered moderately or less stressed areas, where water availability is less critical but still requires careful management to ensure adequate use.

Given the low water intensity of Zain’s operations, which primarily includes office-based activities across locations such as Kuwait, Bahrain, Jordan, and KSA, combined with the climatic conditions in these dry regions and existing infrastructural constraints, water recycling and rainwater harvesting are not practical or cost-effective solutions. Instead, Zain continued to monitor the water conservation measures, including the installation of efficient fixtures (e.g., smart faucets and reduced-flow flush systems), prompt repair of leaks that were installed in previous years in addition to the implementation of policies to ensure effective success in reducing overall water consumption.

This approach enables Zain to set customized, realistic water efficiency targets for each operational site, including time-specific goals to reduce water consumption in water-stressed areas.

Zain Group aligns its water management reporting with the principles of the United Nations Global Compact (UNGC), demonstrating its commitment to sustainability and responsible resource management.



The table below highlights the total water consumption in 2024 at each of Zain’s operations:

	Kuwait	Bahrain	Iraq	Jordan	Saudi Arabia	Sudan	South Sudan
Total Water Consumption in m³ in 2024	15,683	11,946	13,986	5,503	10,580	N/A	3,220
Total area of operational Headquarters (m²)	40,299	19,637	76,361	21,500	59,635	N/A	8,000
Total Consumption in 2024 (m³)	60,918 (Note: This final figure includes six of Zain operations compared to 2023 where only five of Zain’s operating markets were considered, resulting in total consumption of 64,733)						
Y-o-Y Reduction (%)	5.89%						
Y-o-Y Reduction (m³)	3,815						

The following table shows the progress observed in each operation in 2024 specific to water management:

OpCo	2024 Water management Performance
Kuwait	In 2024, Zain Kuwait continued its efforts to reduce water consumption compared to 2023 levels. This progress was driven by initiatives implemented in 2023, including: • The installation of smart water faucets in the remaining buildings of HQ3 and the car parking areas. • The establishment of clear guidelines on the frequency and methods for washing outdoor yards and internal car passageways. To further enhance water efficiency, the company is planning to conduct additional measures in 2025, such as: • Installing flush valves in the HQ1 and HQ2 buildings. • Ensuring that all water leaks are repaired within 24 hours of detection.
Bahrain	Zain Bahrain did not apply any new measures in 2024.
Iraq	Since 2022, Zain Iraq implemented several water reduction measures aimed at improving efficiency and conserving water resources. Key initiatives included: • Replacing outdated generators: Older generators that required significant amounts of water for cooling were replaced with more efficient models. • Repairing and replacing damaged air conditioning units: The damaged AC units at the main headquarters (14,400 m²) were upgraded to ensure effective cooling during the summer while reducing water consumption. These actions contributed to measurable water savings, as reflected in the differences in water consumption between 2022, 2023, and 2024.
Jordan	Zain Jordan successfully implemented water efficiency measures by reducing the water flow and capacity of WC flush systems by 25%, lowering consumption from six liters per flush to 4.5 liters. This initiative led to an overall reduction in total water consumption by approximately 7%.
Saudi Arabia	Zain KSA did not implement any measures in 2024 and has continued to closely monitor water consumption throughout the year.
Sudan	Due to the ongoing conflict and instability in the country, there has been no water consumption from Zain’s headquarters.
South Sudan	In Q2 2024, Zain South Sudan achieved a significant milestone by successfully installing a smart meter system at its headquarters in Juba. This system enables precise and real-time measurement of water consumption, ensuring improved monitoring and management of resources. The installation marks a pivotal step forward, as it addresses the previous inability to accurately calculate water usage in prior years and set an accurate baseline for 2024 measurements.



Biodiversity

Biodiversity conservation and nature preservation are integral components of Zain's climate action strategy as it plays a crucial role in maintaining an equilibrium that supports life on Earth. In the MENA region, biodiversity faces significant challenges due to rapid urbanization, habitat degradation, and climate change. Recognizing these pressing risks, Zain remains steadfast in its commitment to biodiversity conservation and nature preservation by embedding these priorities as core elements of its climate change pillar and integrating biodiversity considerations into Zain's Climate Change Policy Statement.

In alignment with global best practices with regards to biodiversity requirements, Zain has further integrated biodiversity considerations into its operational and strategic decision-making. As part of its efforts, the company introduced biodiversity topics and questions into its supply chain management process. This new requirement ensures that our suppliers assess the potential impacts their operations may have on biodiversity and the traceability of the materials they use. By promoting greater transparency and accountability throughout Zain's value chain, the company acknowledges that the supply chain might be one of the biggest risks for biodiversity.

Zain's Environmental and Social Management Plan (ESMP) is integral to the company's site assessment, selection, operation, and maintenance. Before deploying any networks, Zain conducts thorough environmental assessments to evaluate potential impacts on social and environmental criteria, including biodiversity. This process ensures that all natural habitats are identified and assessed for possible risks. In cases where proposed sites are located within legally protected areas, Zain engages with area sponsors, managers, local communities, and other stakeholders to implement additional conservation programs aimed at enhancing and preserving these ecosystems.

Another key aspect of the ESMP is strict compliance with local laws and regulations regarding biodiversity conservation. Zain ensures that all its operations align with the legal requirements imposed by local regulatory authorities, underscoring its dedication to responsible environmental stewardship. This adherence not only minimizes ecological risks but also demonstrates Zain's commitment to sustainable practices that align with global biodiversity objectives. In addition, as part of its quality control measures, the company includes biodiversity requirements into its site selection forms and maintenance procedures to ensure minimal risk to biodiversity in its tower selection and maintenance procedures on an ongoing basis. As of 2024, no risks were raised in relation to biodiversity.

Zain acknowledges the potential impacts of subsea cable operations on marine ecosystems. Through its subsidiary, Zain Omantel International (ZOI), the organization works closely with its consortia and networks to ensure adherence to biodiversity commitments during the planning, installation, and maintenance of subsea cables. The consortia ensures compliance with international biodiversity protection laws and regulations by integrating robust environmental management practices into the Environmental Impact Assessment (EIA) process for marine cable-laying projects. Compliance requirements are communicated to project teams and monitored throughout the installation process to ensure alignment with biodiversity protection goals.

ZOI ensures its partners conduct comprehensive EIAs in accordance with both regulatory and international standards, identifying sensitive marine and nearshore habitats, mitigating risks to biodiversity, and minimizing ecological impacts. Specific measures include avoiding critical habitats, adapting schedules to prevent disruptions during breeding seasons, and reducing underwater noise pollution. Additionally, ZOI ensures its stakeholders maintains relationships with environmental authorities and relevant parties to uphold marine biodiversity protection protocols and drive best practices across operations.

Strategic partnerships further enhance Zain's biodiversity initiatives. By working with local and international organizations, research institutions, environmental experts, as well as being part of industry-wide working groups (GSMA's Biodiversity Project Group), Zain develops and implements innovative conservation strategies. These collaborations enable the company to restore ecosystems, protect endangered species, and promote sustainable resource use. Engagement with local communities also ensures a more holistic approach to biodiversity preservation.

Zain is dedicated to implementing targeted initiatives that address biodiversity preservation and nature restoration across its operational regions. Below are some examples:

Bahrain Mangroves

In support of Bahrain's commitment to achieving carbon neutrality by 2060, Zain partnered with the Ministry of Municipalities Affairs and Agriculture, and the National Initiative for Agricultural Development (NIAD) to restore vital mangrove ecosystems in the Kingdom. Zain supported the planting of 2,000 mangrove saplings in the Western Aker region. Mangroves, considered one of the most effective natural carbon sinks, play a vital role in sequestering carbon, protecting coastlines, and supporting rich marine biodiversity. This project directly contributes to Bahrain's climate and biodiversity commitment by enhancing carbon sequestration, protecting coastal areas, and supporting marine biodiversity within the Kingdom.

Kuwait Dive Team

Zain Kuwait continued its longstanding partnership with the Kuwait Dive Team for the 26th year, reinforcing its role in preserving Kuwait's marine biodiversity conservation. In 2024, the collaboration supported reef health monitoring and marine waste removal initiatives, contributing to critical ecological restoration efforts. As part of these initiatives, CoralWatch, a non-profit at the University of Queensland, which engages divers globally to monitor coral reefs globally and share data for scientific research, contributed to the monitoring of reef health. Kuwait's diving team, as a regional ambassador, plays a vital role in this global effort, helping to enhance reef conservation in the region.

During 2024, the Dive Team achieved significant results in marine waste removal, collecting 72,200 kilograms of waste in Q2 and 52,000 kilograms in Q3. The 28% decrease in Q3 was due to an unusually large operation in Q2, which included the removal of a sunken boat that contributed substantially to the waste collected during that period.

By integrating waste removal with coral health monitoring, this collaboration highlights a comprehensive approach to Zain's overarching biodiversity conservation and nature preservation commitment.





3. Waste Management

In 2023, Zain Group developed a Waste Management Policy with the goal of eliminating all forms of waste, including e-waste, plastic waste, and wood and paper waste, by 2030. The policy applies to all Zain’s operations, subsidiaries, and entities where Zain has management control. This direction is aligned with the Climate Change Compliance Framework, which has been approved by Zain’s Board of Directors, to ensure the rightful and systematic implementation of waste management initiatives. This alignment reflects Zain’s commitment to transitioning to a net-zero economy by 2050 and addressing the entire value chain’s impact on ecosystems, including communities, the environment, and biodiversity.

Effective as of 2024, Zain established a Waste Management compliance framework that was approved by the Board during the year. The framework integrates waste management best practices into the design, implementation, and operation of Zain’s infrastructure. It also incorporates robust internal controls, detailed procedures, and clearly defined KPIs to ensure effective monitoring, evaluation, and implementation of waste management initiatives across all operations.

Building on its Waste Management Policy and compliance framework, Zain launched several strategic initiatives to address various forms of waste across its operations. These initiatives reflect the company’s dedication to integrating sustainability into every aspect of its value chain, fostering a circular economy, and contributing to the preservation of ecosystems. By collaborating with key partners and leveraging innovative solutions, Zain is making measurable progress toward its 2030 waste elimination goals.

MoU with Ertiqra

In 2024, Zain KSA partnered with Ertiqra, a non-profit focused on recycling and refurbishing used computers, to launch the second phase of its e-waste management campaign. This initiative aims to enhance investment in electronic waste management while promoting sustainable practices. As part of the collaboration, 3,000 electronic devices were recycled, integrating a circular economy in its premises.

MoU with TadwiRe

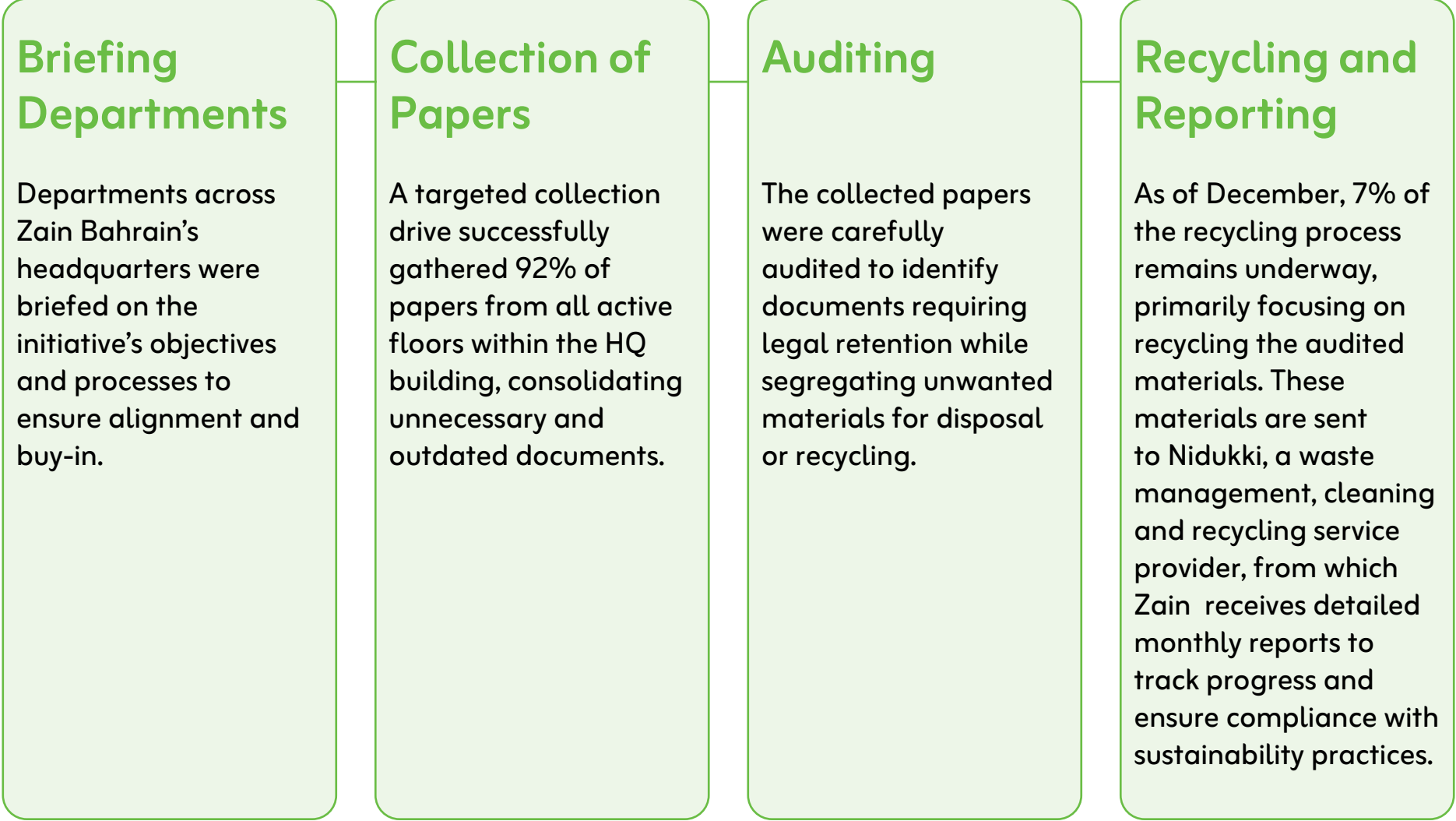
Zain Kuwait reinforced its commitment to sustainability through several waste management initiatives, including its ongoing partnership with the local recycling facility, TadwiRe, the first recycling facility of its kind in Kuwait. As part of this collaboration, the company is in the process of installing e-waste bins internally to launch its e-waste collection efforts.

Key Achievements:

- **Plastic (PET) Waste Reduction:**
 - › Q2: 529.5 kg collected
 - › Q3: 557 kg collected, a 5% increase from Q2
- **Paper Waste Reduction:**
 - › Q2: 9,076 kg collected
 - › Q3: 11,870 kg collected, a 31% increase from Q2
- **E-Waste Management:**
 - › Electronic waste disposal bins placed at HQ2
 - › Released an internal awareness video on e-waste management
 - » Collected 107 kg of e-waste in Q3
- **Other Waste Categories:**
 - › 326 kg of wooden waste collected

Paper Reduction Initiative – Zain Bahrain

As part of Zain Bahrain’s strategy to reduce all waste in its headquarter building, the company instituted a paper reduction initiative aimed at minimizing paper waste and improving operational efficiency, following a structured four-stage process:



Zain Bahrain plans to continue its paper reduction efforts and aims to finalize the initiative in 2025.



Operating Responsibly

This pillar of the strategy focuses on embedding Environmental, Social and Governance (ESG) practices across the company and its value chain. Under this pillar, Zain has three key focus areas:

- 1. Robust disclosure and transparency when reporting on how Zain creates value in the ESG space.
- 2. Stringent responsible supply chain management to ensure the company embeds ethical practices, and standards, and minimizes risks across its value chain.
- 3. Commitment to data privacy to safeguard Zain's stakeholders, including vulnerable segments such as the elderly, women, youth, and migrant workers.

By focusing on these areas, the company is centered on building trust, generating value, and leading in business ethics and transparency, ensuring our operations work beyond required regulatory standards.

Disclosure and Reporting

In 2024, Zain invested in a sustainability data monitoring cloud solution to help the company track, manage, and report on ESG metrics effectively. Through this platform, the company is able to streamline the collection and analysis of ESG-related information effectively, and provide actionable feedback to meet regulatory requirements faster and more efficiently.

Zain continues to monitor the progress of the targets set in its sustainability strategy through its business plans, operational reviews, and sustainability dashboard decks and stakeholder engagement mechanisms. This year, the company created a process manual for all operations on how to report on the targets set in its strategy as per best practices. In addition, Zain also established an evaluation criteria that embeds value creation components for any sustainability initiatives Zain engages in. This criteria, ensures that specific standards of reporting and stated KPIs between Zain and its partners are met and easy to track.

To further commit to transparency and publish reliable data, the company's Scope 1 and Scope 2 emissions have undergone reasonable assurance, ensuring accuracy in Zain's environmental reporting. The letter can be found on [page 129](#) of the report.

Responsible Supply Chain

Target for 2024

50% of active suppliers to answer the supplier self-assessment questionnaire and watch the supplier training video, and existing suppliers to align to policies

Zain's Response

Zain implemented a comprehensive strategy for supply chain management to screen and address sustainability risks and ensure that suppliers meet its ESG/supply chain standards. This approach aims to promote sustainable practices throughout its value chain and reduce reputational risks. The company also emphasizes the importance of developing its local supply chain with the aim of contributing to the local economy and enhancing supplier resilience. Tracking and measuring Zain's contribution to local suppliers across each market on a yearly basis showcases the company's commitment to supply chain stability.

The company's supply chain management processes are designed to rigorously screen suppliers to ensure they align with our values and standards. This includes comprehensive assessments that evaluate potential partners on various criteria, such as ethical practices, sustainability commitments, and compliance with regulatory requirements. By implementing a structured responsible supply chain management framework, Zain aims to partner with suppliers who demonstrate a commitment to responsible business practices and contribute positively to the company's sustainability goals. This proactive approach not only safeguards the company's operations but also reinforces its dedication to fostering a supply chain that reflects its corporate values.

For its fourth consecutive year, Zain conducted its annual Supply Chain Management Forum, inviting the procurement and sustainability teams from each operation to gather together, that saw 40 participants. The Forum's agenda included ensuring suppliers align to Zain's policies, such as its supplier code of conduct and human rights policy statement; suppliers self-assessment questionnaire; supplier training on sustainability-related topics, physical audits, and the local and foreign supply chain breakdown.

This year, Zain updated its self-assessment questionnaire to include aspects on net-zero, biodiversity, and traceability. The company aims to ensure it assesses its suppliers on net-zero ambitions and their impact on biodiversity, as well as looking into aspects such as the policies they have in place, compliance to regulations and nature-related laws, in addition to any biodiversity-related certification or frameworks. The traceability aspect evaluates whether the organization has a system to track the origin and movement of product materials and identifies any regions or suppliers where they encounter challenges in this process.

Topics covered in Supplier Self-Assessment Questionnaire include:

-  Workforce profile including breakdown of gender and people with disabilities.
-  Environment, which includes health and safety, training, energy consumption, packaging, waste management, use of raw materials, newly added net-zero targets, biodiversity, and traceability.
-  Social aspect, entailing labor, human and children's rights, child labor, compensation, and discrimination.
-  Security assesses how a supplier contracts another company for security purposes in situations where such a service is required.
-  Governance includes stakeholder engagement, accountability, grievance mechanisms, disclosure, and reporting.
-  Information Security assesses the information security management systems in place and their governance.
-  The use and sourcing of conflict minerals.



Zain Supply Chain Management Process



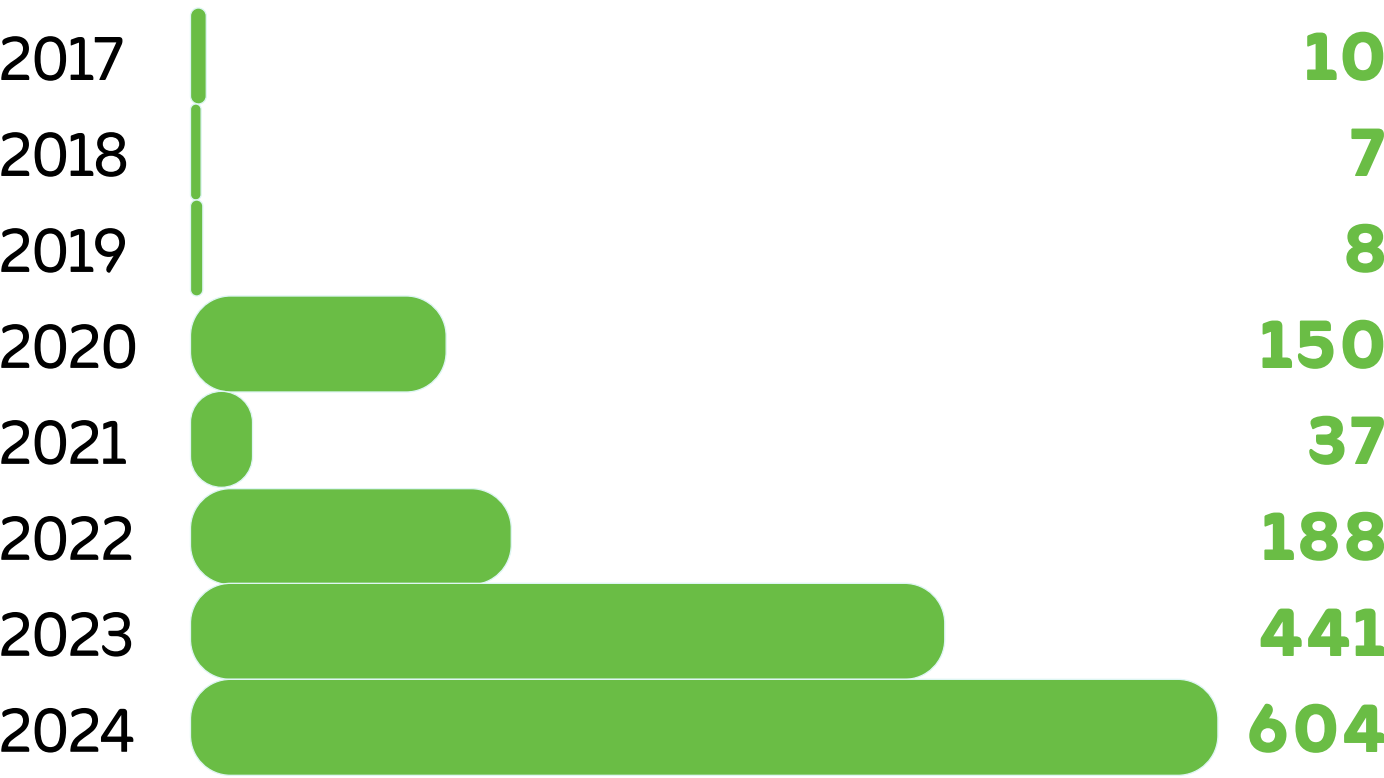
- **Supplier Code of Conduct and Human Rights Policy Statements:** These documents are available in both Arabic and English on the Zain Group website.
- **Supplier Training:** In response to feedback from Zain's 2023 survey, which confirmed that suppliers had viewed the training videos and identified areas of interest, the company recognized suppliers' interest on anti-corruption. In 2024, Zain released its third training video, focusing on the company's anti-corruption principles. This video addresses key topics such as business conduct, gifts and hospitality, third-party relationships, and the importance of accurate financial records. This year, Zain successfully trained 185 suppliers on it's Supplier Code of Conduct, Human Rights and Anti-Corruption.
- **Supplier Self-Assessment Questionnaire:** Zain uses a self-assessment questionnaire to gauge suppliers' adherence to its sustainability and ethical policies. A structured workflow was established to ensure that quality controls are in place for verifying the accuracy of suppliers' responses.
- **Physical Audit:** Zain conducts physical audits on an annual basis, increasing its target year-on-year as an additional layer of risk mitigation. These audits assess compliance with Zain's Supplier Code of Conduct, focusing on critical areas such as labor practices, environmental impact, and health and safety standards. During these audits, Zain collaborates closely with suppliers to identify gaps and provides recommendations for improvement, aiming to reinforce responsible practices across its supply chain. Any non-compliance issues identified are documented, and follow-up assessments are scheduled to ensure that corrective actions are effectively implemented.

Supplier Self-Assessment Questionnaire Completion per Operation

Operation	Number of Suppliers Target	Percentage achieved	Number of Suppliers Completion
Bahrain	50% of Active Suppliers in 2024	31%	31
Iraq		59%	79
Jordan		50%	170
Kuwait		55%	186
Saudi Arabia		19%	114
Sudan*		2%	4
South Sudan		10%	20
Total/Average			604

*The number of suppliers conducting supplier self-assessment questionnaires is impacted due to the political conflict in Sudan.

Progression of Supplier Self-Assessment Questionnaire



* In 2024, the number of responses reflects those from Group and suppliers across its operations

This year, Zain continued to implement its observation form; created in 2023, when conducting each physical audit. This form ensures Zain reports on risks identified as a result of physical audits. The observation form ranks the severity of the observation raised and if considered high-risk and a violation of the supplier code of conduct, the supplier undergoes a termination process. Throughout the year, zero suppliers were terminated based on results of the physical audit.

Supplier Physical Audit Completion per Operation

Operation	Target of Number of Suppliers	Completed	Number of observations raised and closed	If observation raised, which category does it fall under: Labor Rights, Human rights, Climate-related
Bahrain	10	10	No observations were raised.	N/A
Iraq	10	10	11 of Medium Materiality	Labor rights, Health and Safety
Jordan	10	10	26 of Low, Medium and High Materiality	Healthy and Safety, Policies & Procedures, Company Security
Kuwait	10	10	4 of Low, Medium and High Materiality	Health and Safety, Policies and Procedures, Labor Rights
Saudi Arabia	10	8	22 of Low, Medium and High Materiality	Labor Rights, Health and Safety
Sudan*	10	N/A	N/A	N/A
South Sudan	10	11	Zain South Sudan continued evaluating supplier observations and will begin documenting insights in 2025.	

* Due to political instability, Zain Sudan was unable to conduct on-site, physical audits

Procurement Spending

Zain continues to monitor its spending on local vs. foreign suppliers on an annual basis. In comparison to 2023, Zain increased its spend on local suppliers in the following markets Jordan, Saudi Arabia and South Sudan.

The graph below illustrates Zain Group's procurement spending for local vs. foreign suppliers for 2024 as compared to 2023.

2024 Procurement Spending Per Operation

Operation	% Spending on Local Suppliers	% Spending on Foreign Suppliers
Bahrain	49%	51%
Iraq	40%	60%
Jordan	68%	32%
Kuwait	49%	51%
Saudi Arabia	96%	4%
Sudan*	90%	10%
South Sudan	95%	5%
Total	73%	27%

Procurement Spending: Year-on-Year

Average % Spending on Local Suppliers



Average % Spending on Foreign Suppliers





Data Privacy

Target for 2024

Educate marginalized communities by creating a data privacy and protection training program by 2025

Zain’s Response

Throughout the year, each of Zain’s operations finalized its plan on data privacy programs and identified the target segment. Sudan was not able to finalize its plan due to the ongoing civil unrest in the country.

Bahrain

TARGET SEGMENT

- Elderly Community

PROGRESSION IN 2024

A session on cyber security was conducted for 15 elderly participants based in the Al Hekma Retired Society in Bahrain. The aim of the session was to educate this community on how to protect their banking information online, how to verify family and friends online, and avoid being catfished, and how to identify any occurrence of potential or actual fraud.

Iraq

TARGET SEGMENT

- Students

PROGRESSION IN 2024

In 2024, Zain Iraq hosted three sessions to promote Data Privacy Awareness to female university students. A total of 161 students were reached.

The sessions were conducted in partnership with the University of Information and Communication Technology, incorporating female high school students.

Topics included: How to protect their information online, avoid the leaking of personal data, and potential security risks. At the end of each event, the company hosted Q&A forums to assess the impact of the awareness sessions. Through this program, the company aims to raise awareness on the importance of reporting any form of blackmail students may experience online.

Kuwait

TARGET SEGMENT

- Humble Expat Workers

PROGRESSION IN 2024

As Zain Kuwait’s cleaning and janitorial services are provided by third-party staff, the company offered its first data privacy session to upskill and share knowledge to this target group. The session included the following topics: data privacy, physical security, and information security.

South Sudan

TARGET SEGMENT

- Ignored and displaced persons (IDPs), Remote areas of Refugees

PROGRESSION IN 2024

In 2024, Zain South Sudan signed an MOU with The Whitaker Peace & Development Initiative (WPDI) with an objective of building community capacity and enhance environmental conservation through smart livelihood activities and skill development. One of the focus areas of this partnership in 2025 will be customer's Data privacy by conducting data privacy awareness sessions for marginalized communities across Juba, Budi, Nimule, Maridi and Yambio.





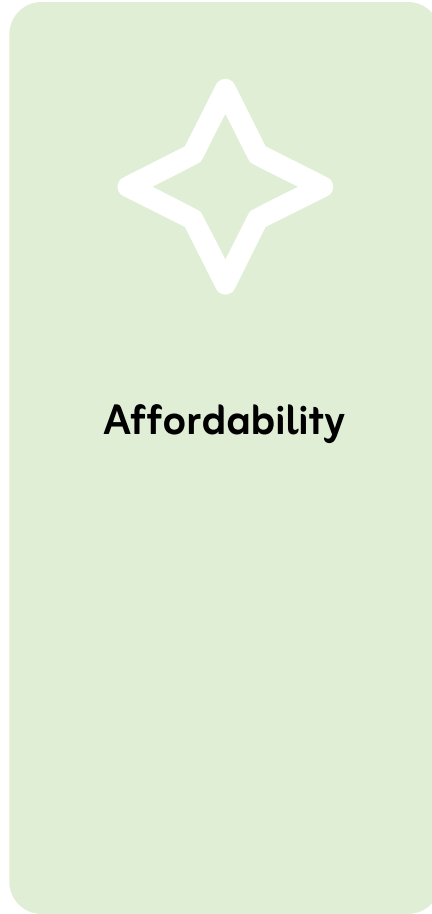
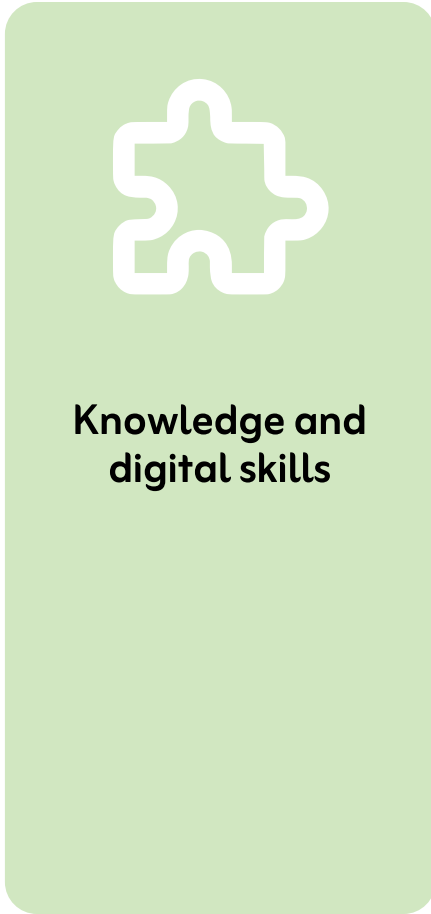
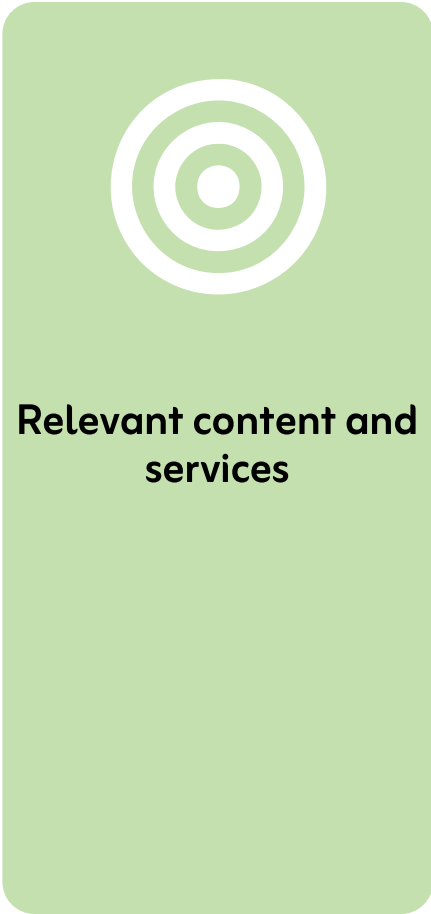
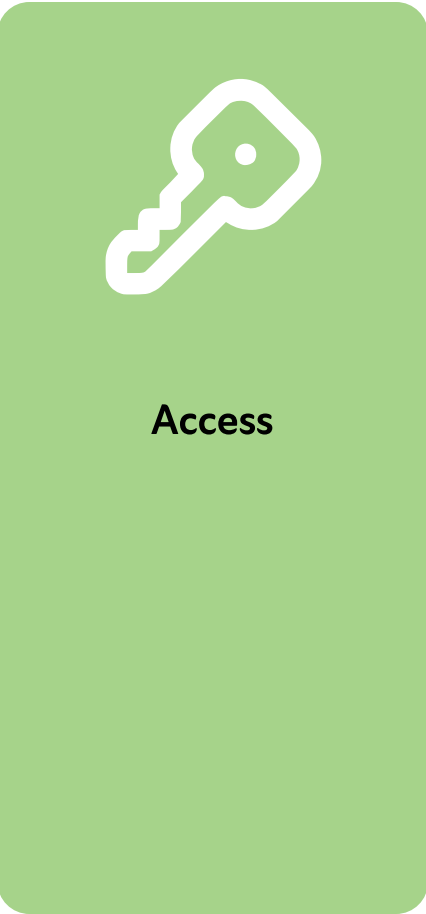
Inclusion

Under Zain’s Inclusion pillar of its Corporate Sustainability strategy, the company aims to bridge the digital divide among vulnerable community segments such as the elderly, people with disabilities, women, and children. Zain recognizes the value its core services bring to transforming people’s lives and its contribution to human and social development. Through connectivity, people can access a wide range of capacity-building opportunities, allowing them to develop their own skillset and contribute to the human capital of the communities in which Zain operates. However, it is important to ensure inclusion is pushed to the forefront with respect to any form of development, as it strengthens the company’s social license to operate and the relationship between the organization and its communities.

Despite advancements in connectivity, significant inequalities in access to hardware, devices, the internet, and digital skills are still evident, even in countries where the majority of the population is online. According to the GSMA, [key boundaries](#) to accessing mobile connectivity and the online space include:

To address such barriers, Zain devised specific targets and KPIs across its markets that provide each operation with the necessary guidance and strategic direction, while simultaneously offering the flexibility needed to address such challenges in a way that makes sense to their operating context.

Under its inclusion pillar, Zain focuses on the following segments:

 Elderly community	 People with disabilities	 Women in technology		
 Affordability	 Knowledge and digital skills	 Relevant content and services	 Safety and security	 Access



Elderly community

Target for 2024

Address 260,000 elderly people across Zain's footprint by 2025 through products and services, marketing campaigns, and benefit features

By 2025, Zain aims to address 260,000 elderly people across its footprint through tailored products, services, marketing campaigns, and benefit features for the elderly. In the MENA region, the elderly face challenges such as limited access to digital resources, social isolation, and financial vulnerability, hindering their quality of life. Having limited access to digital resources has made it difficult for some elderly to complete daily activities such as:

- Access to health and social care
- Obtaining information over the phone via a machine
- Carrying out administrative activities
- Conducting banking transactions
- Making online purchases

Such challenges can lead to greater isolation, limiting the access of this group to improve their well-being. According to Morgan Stanley's 'Cyber Security for Seniors: A Guide for Loved Ones' report, seniors are actively embracing digital services. However, the lack of knowledge on tech savvy security services makes them vulnerable to attack by cyber criminals.

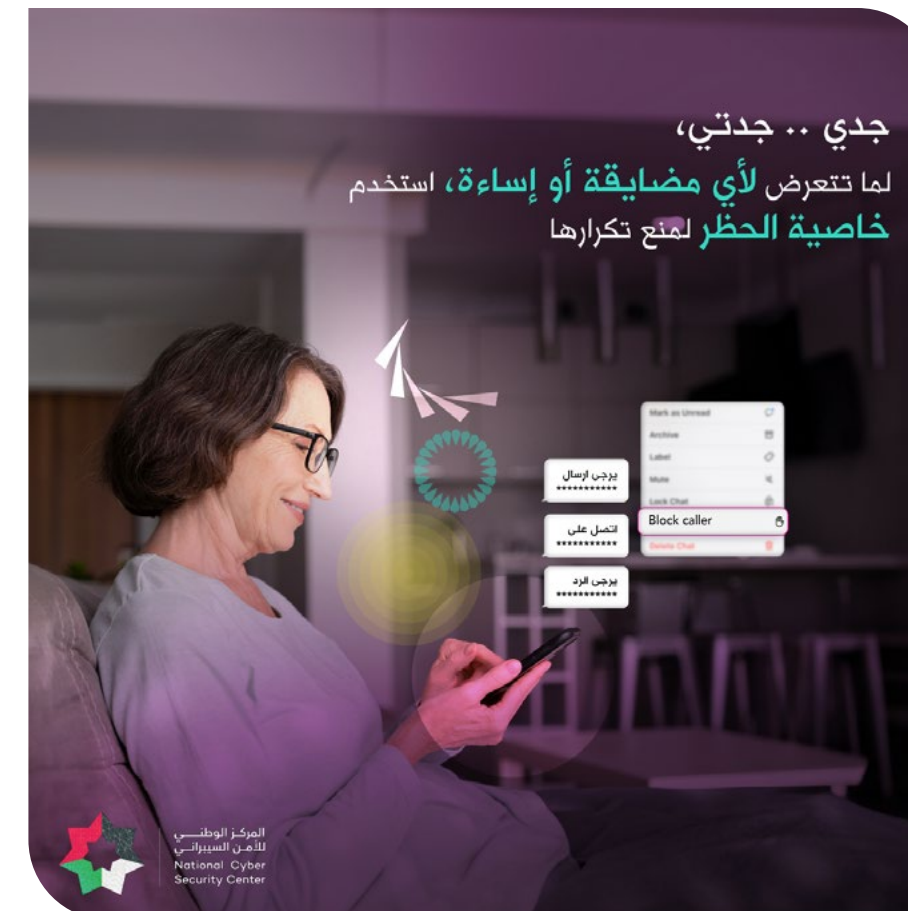
The context highlighted above presents Zain with an opportunity to deliver the needed awareness and provide this segment with the necessary tools to confidently engage and benefit from being online.

This year, Zain further advanced its research on the needs and challenges of the elderly community and

strived to provide services to meet their requirements. The company initiated a series of activities and campaigns aimed at reaching this demographic. By providing access to digital tools, accessibility, and education, Zain empowers the elderly to navigate the digital space more safely, helping them remain connected, and provide them with access to essential services. Initiatives included:

- Zain Jordan launched a dynamic social media campaign on cyber safety in partnership with the National Cyber Security Center, focusing on empowering the elderly community (65 years old+) to protect themselves online. This initiative offered easy-to-understand tips to help seniors avoid hacking and online threats. In a post-campaign survey, 62% of participants reported finding the advice helpful and accessible.
- Zain Iraq hosted Baraka Bazaar, an initiative that demonstrated the company's commitment to the community and cultural heritage of Iraq, in which 11 skilled seniors participated in the bazaar. Zain employees visited nine seniors at their work locations in Basra, honoring their traditional craftsmanship. These activities provided a valuable platform for seniors with limited income to showcase their handmade crafts, fostering intergenerational engagement and preserving heritage.
- In collaboration with the Kebar Association, Zain Saudi Arabia conducted a comprehensive training session for the elderly, involving 372 volunteer hours and benefiting 550 participants. This initiative featured specialized training courses tailored specifically for senior citizens, aimed at helping them master essential digital applications and programs. These courses were designed to enhance their quality of life by equipping them with the necessary digital skills to help them accomplish their day-to-day tasks more easily. These included accessibility to emails, digital time management, and electronic data safety. Zain employees actively participated in the program, providing mentorship

- and support throughout the training sessions.
- Zain Group commemorated the International Day of Older Persons by launching a social media campaign dedicated to issues related to the elderly across its various social media platforms in its markets of operation. The campaign will be continued in 2025 and redirected according to the responses received from Zain's social media followers.





People with disabilities

Target for 2024

Launch core data bundles and packages in 2024 for people with disabilities

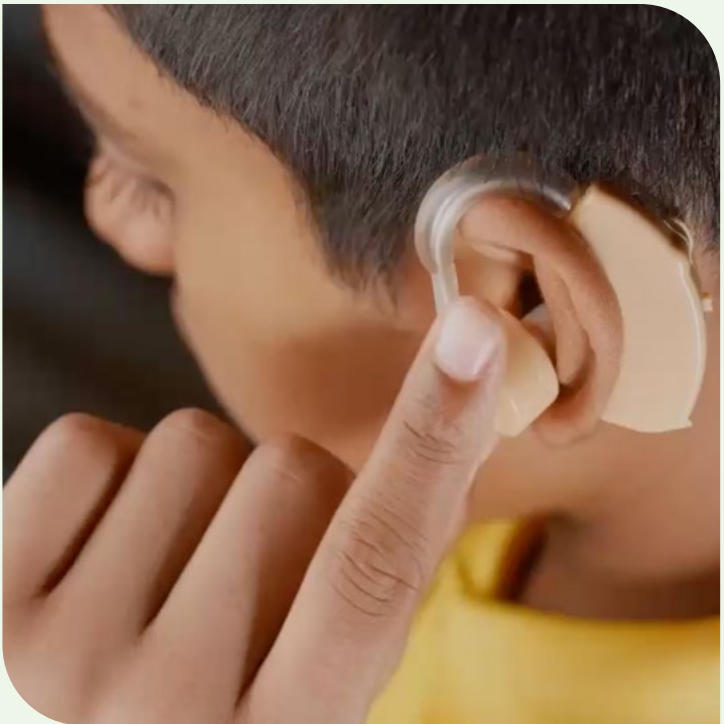
Based on a report published by PwC titled ‘The State of Digital Inclusion in the MENA Region,’ approximately 15% of the region’s population may be classified as disabled. As the world moves towards fully digital economies, it is vital to ensure such segments are not left behind. The GSMA presents mobile operators with a framework that aims to provide a basis for increasing digital inclusion among people with disabilities.

- 1. Understand the context and gather needed data
- 2. Integrating disability inclusion in relevant policies
- 3. Working cross functionally with other entities using a multi stakeholder approach
- 4. Addressing the barriers

Based on the framework highlighted above, Zain ensures that it holistically assesses the challenges and needs of this segment and addresses each point. Targeting this segment in a meaningful way generates value for the company by meeting regulatory requirements such as in Kuwait and Saudi Arabia in which we must ensure that we provide a core bundle/service for this segment. Providing assistive technologies also boosts innovation in servicing this community.

The following table highlights each market’s progress in providing core services to the disabled community.

Operation	Yes or no	Data Bundle for Persons with Disabilities (PwD)
Bahrain	Yes	In collaboration with Primary Health Care and the Bahrain Deaf Society, Zain Bahrain reaffirmed its commitment to Natawasal, the pioneering health video call center designed specifically for the deaf community in the Kingdom. Launched in 2022, this initiative addresses the unique healthcare needs of deaf and hard-of-hearing individuals, enabling accurate medical diagnoses and effective communication with healthcare providers. Natawasal operates through a dedicated WhatsApp number (+973 37239239), connecting users to a video link that facilitates real-time interpretation services. These interpreters act as intermediaries, ensuring seamless communication between PwDs and their intended contacts. The service spans 27 health centers across the Kingdom, providing essential support that bridges the gap between patients with hearing impairments and healthcare professionals. To date, the initiative has recorded 739 video calls, reflecting its impact in enhancing accessibility and inclusivity within the healthcare system. In 2024, Natawasal expanded its scope by partnering with the General Directorate of Traffic, enabling deaf and mute individuals to address inquiries related to traffic matters. This extension further demonstrates Zain Bahrain’s commitment to removing communication barriers and fostering equal access to essential services.
Iraq	No	Due to lack data and country-wide statistics, Zain Iraq did not launch any bundles specified for PwDs. To circumvent this challenge, Zain Iraq provided other support services for this community, helping them access the company’s digital products and services. This year, Zain Iraq provided support to 97 visually impaired students by offering them a monthly 100GB data bundle. This initiative was designed to facilitate their access to educational material on YouTube, aiding them in their preparation for school finals.
Jordan	Yes	In 2024, Zain Jordan's Basma line for the deaf and mute was reactivated, incorporating a new process in call centers to serve individuals more efficiently and informatively. The Basma Line+ was revamped after a focus group of approximately 20 mute individuals met with our commercial and sustainability teams to refine the line’s package details and benefits. The bundle had approximately 300 subscribers in 2024.
Kuwait	Yes	Following the launch of its own PwD bundle in 2022, Zain Kuwait undertook a comprehensive initiative in 2024 to enhance this bundle, aiming to better meet user needs and attract more customers. This initiative included the organization of a workshop called "Tech for All", which was attended by 15 people with various disabilities. The workshop was guided by the GSMA’s Mobile Internet Skills Training Toolkit and followed by a detailed post-workshop survey. The survey results indicated an interest in a potential follow-up session focused on repairing and replacing mobile devices for PwDs. Zain Kuwait is exploring a collaboration with a mobile services reseller, where participants can have their devices repaired, which Zain Kuwait intends to incorporate into its 2025 plans for PwDs.
Saudi Arabia	Yes	During Purple Saturday, a social media campaign in collaboration with the Authority of People with Disability (APD), Zain KSA was able to highlight a lifetime 50% discount on selected postpaid voice bundles. This initiative led to a remarkable 600% increase in the subscription. For more information on packages, please visit Zain KSA’s website.
South Sudan	In Progress	In 2024, the commercial team was active in its development of an inclusive bundle tailored for PwDs.





Target for 2024

Embed the GSMA's Principles for Driving the Digital Inclusion of Persons with Disabilities by 2025

Since 2020, Zain has been a signatory to the GSMA's Principles for Driving the Digital Inclusion of Persons with Disabilities. Zain recognizes the importance of digital inclusion and is committed to integrating it throughout its value chain. As a signatory to the Principles, Zain:

- 1. Embraces disability inclusion at every level of the organization
- 2. Understands how to reach and better serve persons with disabilities
- 3. Delivers inclusive products and services that meet the diverse requirements of PwDs

The company addresses the principles by taking following actions:

Principle 1: Embrace disability inclusion at every level of the organization

Action taken: The company established an internal disability inclusion initiative, WE ABLE, launched in 2019. The program aims to embed disability inclusive practices in the company by 2025. More information on the initiative can be found on [page 77](#).

Principle 2: Understand how to reach and better serve persons with disabilities

Action taken: Under the WE ABLE initiative, Zain launched a Group-wide social media campaign 'Be My Eyes'.

The aim of the campaign was to immerse the audience in the daily experiences of a blind person. The campaign raised awareness, and ultimately

drove meaningful changes in behavior and processes that affect the visually impaired. By providing a first-person perspective of the challenges and triumphs of navigating a world designed for the sighted, the campaign aimed to challenge preconceived notions and encourage more inclusive practices across various sectors.

More details on this campaign can be found on [page 77](#).

Principle 3: Deliver inclusive products and services that meet the diverse requirements of PwDs

Action taken: As Zain operates in eight distinct markets, each with its own specific challenges and requirements for supporting PwDs, each operation has developed a tailored bundle to address the unique needs of its market.

These bundles include a range of initiatives, such as launching social media campaigns with integrated sign language translation, providing on-demand interpreter services at Zain outlets via tablets, and offering a dedicated video calling center. Through the video calling service, customers can initiate contact via WhatsApp, and be connected with an interpreter who facilitates communication between the PwD customer and the intended party.

For further information on the PwD bundles available to Zain customers, please refer to [page 98](#).

Women in technology

Target for 2024

To mentor 150 female university students studying STEM in each operating market

In response to the significant gap in the MENA region's market, where fewer women are pursuing careers in STEM (Science, Technology, Engineering, and Mathematics), Zain established the Women in Tech (WiT) program in 2020. This initiative is further validated by a study from UNESCO, which confirms that women account for just 40% of the STEM workforce in the MENA region, underscoring the need for more programs like WiT to encourage female participation in STEM.

The annual Global Gender Gap Report 2024 published by the World Economic Forum, highlights major statistics that showcase the importance of programs such as WiT in addressing the challenges faced by women who aim to pursue STEM-related careers.

- Globally, women remain underrepresented in STEM roles, comprising only 28.2% of the STEM workforce compared to 47.3% in non-STEM sectors
- Men and women continue to showcase STEM skills disproportionately, the share of women with STEM skills is currently at 27.1%
- Women are overrepresented in non-STEM occupations across all industries. This creates a major disadvantage with regards to technological and workforce transitions, as women continue to occupy the lower growth, lower-paying jobs that are likely to be negatively affected in the short-term.

Based on the report, the ratio of STEM graduates is only available for three out of eight of Zain's markets.

This highlights the need for Zain's operations to highlight this challenge and use its influence to gather more insights to ensure proper representation in STEM is upheld.

Country	Percentage of Female STEM Graduates	Percentage of Male STEM Graduates
Bahrain	41%	59%
Iraq	Not available	Not available
Jordan	Not available	Not available
Kuwait	Not available	Not available
Saudi Arabia	37%	63%
Sudan	Not available	Not available
South Sudan	Not available	Not available
United Arab Emirates	41%	59%





Women in Tech (WiT):

The primary objective of Zain’s WiT program is to introduce recent graduates to various STEM-related job opportunities. To achieve this, the program pairs female participants with mentors at Zain, providing invaluable guidance and support.

Zain continues to work on expanding the WiT program across its operations, demonstrating a strong commitment to contributing to women’s empowerment in the technology sector and fostering a supportive community.

In 2024, the company successfully launched the fourth round of the program, training 485 participants across its operations in Kuwait, Bahrain, Iraq, Jordan, and Saudi Arabia. As the program continues to evolve, each of Zain’s regional operations tailored its timeline and structure to accommodate the increasing number of trainees.

Through these efforts, Zain plays a pivotal role in promoting gender equality in the tech industry, inspiring the next generation of female leaders in STEM.



Operation	Context	Achievements
Bahrain	In 2024 Zain Bahrain continued to seek partnerships with key stakeholders to foster mentorship opportunities and engage STEM students.	2022: - 2023: - 2024: -
Iraq	Out of 400 registrations, 160 applicants were selected to participate in the WiT program. Over three months, participants underwent extensive mentoring, covering approximately 40 technical topics, alongside sessions on soft skills to enhance their readiness for the job market. To date, the program has successfully led to the hiring of over 40 women. This year, Zain Iraq also hosted a career fair for WiT participants, featuring Zain subsidiaries and leading tech companies, providing direct employment opportunities. As a result, 10 women secured jobs through the fair.	2022: 115 2023: 136 2024: 160
Jordan	Zain Jordan successfully completed the WiT program, benefiting 154 women. The program was executed in two phases to achieve the 2024 target. In the first phase, 92 mentees participated, gaining valuable insights and skills through a series of structured sessions. The second phase accommodated 62 additional mentees and comprised six informative sessions covering topics such as digital transformation, career coaching, CV writing, and soft skills development. Delivered in a hybrid format to ensure accessibility for all participants, post-event surveys revealed a preference for smaller group sessions to maximize engagement with instructors.	2022: 100 2023: 122 2024: 154
Kuwait	Zain Kuwait successfully concluded the pilot of the WiT program with seven participants graduating this year. The program featured mentoring sessions on key topics such as data analysis, leadership, teamwork, and navigating workplace challenges. This trial serves as a foundation for scaling the program to a larger audience in 2025, with the goal of achieving Zain Kuwait’s cumulative target for the past two years. Post-event surveys of the program have determined a minimum satisfaction rate of 81.9% among participants, highlighting the program’s success. Sessions on building networks and leadership skills received frequent praise for their meaningful impact on participants' daily lives.	2022: - 2023: - 2024: 7
Saudi Arabia	The Communications, Space and Technology Commission and Zain collaborated in the WiT program for the third year. The program commenced in December 2024 and was tailored for 150 women.	2022: 100 2023: 150 2024: 150
Sudan	Zain Sudan launched the WiT program in December in an online format, adapting to the current situation on the ground. The initiative will extend into January 2025 and aims to empower women by providing them with advanced skills in programming, artificial intelligence, and innovation. The program will follow a hybrid model, combining pre-recorded sessions with live, interactive ones to maximize accessibility and engagement for participants.	2022: 69 2023: - 2024: 14
South Sudan	The team is planning to launch the WiT program in collaboration with the Forrest Whitaker Peace Development Initiative.	2022: - 2023: - 2024: -

Entrepreneurship for Women

Zain partnered with UN Women under the UN Women–UNDP joint program, ‘Accelerating Implementation of SDG 5 in the State of Kuwait: Phase 2 (2024-2027),’ to support Kuwaiti women entrepreneurs in enhancing their business capacities. This collaboration focuses on empowering women aged between 18-45 years of age, targeting licensed business owners and operators of informal enterprises. Through a comprehensive survey, the initiative gathered insights directly from the participants to identify the most effective capacity-building strategies. Zain played a pivotal role in raising awareness about the initiative and facilitating the survey’s distribution, which garnered 31 responses. The goal is to strengthen these entrepreneurs’ contributions to the national economy and sustainable development by offering tailored support to help their businesses thrive.





Generation Youth

In the MENA region’s dynamic landscape, safeguarding children's rights and ensuring their safety in the online world are paramount amidst rapid digital advancements and unstable geo-political environments. As internet accessibility and penetration grows, so does the need to protect children and youth from online risks such as abuse, cyberbullying, grooming, and exposure to harmful content such as child sexual abuse material (CSAM). The widespread prevalence of CSAM underscores the urgent need for robust regulatory frameworks and proactive measures to protect children in digital spaces.

Zain acknowledges its key role in the digital world and is committed to collaborating with stakeholders to implement stringent policies and educational initiatives to ensure online safety for all. By promoting digital literacy and responsible online behavior, Zain aims to empower caregivers and youth alike, creating a safer online environment that supports children's rights and well-being.

Separately, addressing youth unemployment requires a comprehensive strategy integrating education and skills development to provide sustainable employment opportunities. With the MENA region's youth unemployment rate currently at 27%, the urgency of these efforts is clear. By promoting children's rights and online safety, enhancing digital literacy, and tackling youth unemployment, Zain demonstrates its determination to address children’s rights as a key material topic, ensuring a more inclusive and secure ecosystem for sustainable growth.

As an advocate for children's rights and in alignment with the UN's Sustainable Development Goal 16.2, which aims to end all forms of violence against children by 2030, Zain launched a powerful campaign in response to rising global violence that is impacting children disproportionately. This initiative followed the escalating crises and conflicts worldwide, where children are bearing the brunt of severe hardships and violence, affecting their physical and mental health.

The campaign, titled [#EveryChildHasRights](#), was designed to highlight the critical threats faced by children in conflict-affected regions and demands their protection. It included a compelling video underscoring the urgent need to safeguard children’s rights, engaging audiences in meaningful and emotional dialog. Through the campaign, Zain aimed to create a global call to action and foster a deeper understanding of the pressing issues at hand. In 2024, the campaign successfully garnered 16.5m+ impressions across Zain's social media footprint, amplifying its message and driving significant awareness on the issue.

Child Online Safety

Digital Literacy

Youth Unemployment



Online Safety:

At Zain, we understand the importance of balancing the benefits of digitization, while recognizing potential risks, particularly with respect to children. The company actively engages with key stakeholders, including children, parents, caregivers, governments, and child protection organizations, to address this issue comprehensively. Zain aims to raise awareness about responsible online behavior through educational campaigns and collaborations with local entities.

Screen Time Campaign

In 2024, Zain launched a two-phase campaign to address the growing risks and challenges associated with excessive screen time, aligning with our commitment to sustainability and digital and online safety. Phase 1 of the campaign focused on children, highlighting how screen overuse isolates them from traditional childhood experiences like imaginative play and social interactions. Phase 2 shifted the spotlight to parents, illustrating how their digital habits can impact family dynamics, emotional connections, and the overall well-being of their children. The campaign reached 43.9 million impressions across Zain’s social media channels.

This campaign encouraged healthier screen use and raised awareness about the broader implications of online behavior, such as the potential risks to children’s mental and physical well-being in the digital age.

To assess its effectiveness, a pre- and post-campaign survey was conducted, revealing a significant shift in awareness and behavioral intent among participants:

- 82% of viewers stated they will set boundaries for screen time when spending time with their children after watching the campaign.
- 80% expressed their intention to reduce their overall screen time use.
- 100% of respondents reported that it helped them become more aware of how to manage their screen time.

Phase 1:



Phase 2:





Target

Partner and support the functionality of child helplines and hotlines across markets

Zain’s Response

Zain is advancing its three-year Memorandum of Understanding (MoU) with Child Helpline International (CHI) to support child helplines across its operational footprint. The partnership focuses on mobilizing, facilitating, and supporting child helplines in Zain’s markets. In its second year, Zain and CHI have successfully collaborated to enhance the effectiveness of helplines across Zain’s operational markets.

As part of this ongoing commitment, Zain delivered the opening speech at the Regional Consultation of Middle East and North Africa Child Helplines in 2024, highlighting the critical role of these services in providing support and protection to children and young people across the region. Zain also played a significant role in contributing to CHI’s [Voices of Children & Young People Around the World](#) report, helping amplify the voices of youth globally. This contribution underscores Zain’s advocacy for children’s rights and ensuring their perspectives are central to the conversation about child protection and well-being.

Zain Bahrain

Helpline #: 998



PROGRESSION OF HELPLINE

Zain Bahrain signed a Memorandum of Understanding with the Bahrain Helpline Office, under the Ministry of Social Affairs, to outline the company's strategic initiatives to create shared value for both organizations.

Zain Iraq

Helpline #: 497



PROGRESSION OF HELPLINE

The team continued to engage with the Social Police’s local helpline and planned to invest further in helpline software. However, the initiative is currently on hold awaiting further guidance from the government.

Zain Jordan

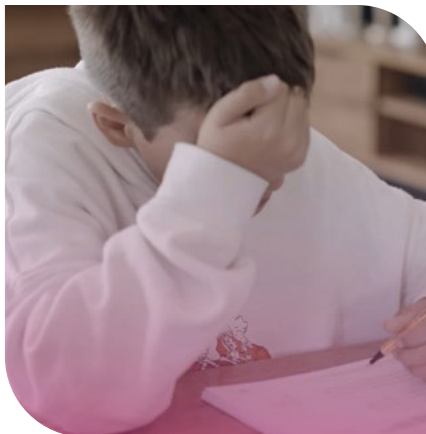
Helpline #: 110



PROGRESSION OF HELPLINE

The company continued its renewed five-year partnership with the Jordan River Foundation.

As part of the collaboration, Zain Jordan took the initiative to conduct Stress Inoculation Training. Additionally, another training session on Cognitive Behavioral Therapy was held over four days, totaling 50 hours of training. The company also took part in several awareness campaigns on the helpline, which garnered a total of 15.9k impressions across its social media channels.



Zain Kuwait

Helpline #: 147



PROGRESSION OF HELPLINE

This year, Zain Kuwait launched a partnership with the Kuwait National Child Protection Program (KNCPP). As part of the collaboration, Zain created several ongoing awareness campaigns centered on safeguarding children's rights. Both entities agreed on several key performance indicators that Zain will support, including conducting roadshows to schools, and improving the service quality.

The helpline witnessed major improvements following the partnership, with service quality rising from 50% to 83% between May and June, and answered calls increasing by 13% following the campaign launch. Building on this progress, an awareness video promoted in August on Instagram and in hospitals led to a 25% increase in calls by September, highlighting the campaign’s success.

To learn more about the helpline office in Kuwait, please watch the video Zain produced in collaboration with KNCPP [here](#).

Zain Saudi Arabia

Helpline #: 116111



PROGRESSION OF HELPLINE

In 2024 , Zain Saudi Arabia raised awareness of the helpline and hosted various events with children to instill the importance of digital safety and responsible online behavior. These efforts aim to create a safer and more informed community. After hosting several events in public spaces, the company handed out more than 1,100 giveaways to children, instilling the idea of the helpline in play and game form.

Zain Sudan

Helpline #: --

PROGRESSION OF HELPLINE

Unfortunately, the helpline offices in Sudan were destroyed, prompting the company to take proactive measures to ensure children’s rights. Zain Sudan began contacting various aid agencies to re-establish a helpline in a different region and restart the program.

Zain South Sudan

Child helplines are not available In South Sudan, however, Zain continued to address strategic communications to discuss its establishment with relevant parties in 2024.



Target

Install CSAM blocking mechanisms within our networks across all markets

Zain's Response

Zain continued to take major strides in installing blocking mechanisms that prevent CSAM through Project Arachnid and the Internet Watch Foundation (IWF) across its operations. As part of the ongoing commitment to online safety, Zain remains vigilant in adopting technologies that enhance the detection and prevention of CSAM, thus contributing to a safer and more secure digital environment for all.

Zain Bahrain
Already installed an extensive CSAM blocking mechanism as per TRA requirements

Zain Iraq
Launched Q4 2023

Zain Jordan
Launched Q4 2022

Zain Kuwait
Launched Q3 2021

Zain Saudi Arabia
Launched Q2 2023

Zain Sudan
Throughout the conflict, Zain maintained its installation and operations with the Internet Watch Foundation

Zain South Sudan
Initiated the process of installation with related stakeholders

The company continued its collaboration with the GSMA Mobile Alliance against Digital Child Sexual Exploitation. This alliance focuses on proactively addressing technology-facilitated child sexual exploitation through a multi-stakeholder approach. It engages with key international stakeholders and telecom operators to ensure a coordinated and effective response to counter digital child sexual exploitation and abuse. This year, the Alliance met four times and discussed lobbying efforts, conducted knowledge-sharing initiatives, and shared best practices on tackling digital child exploitation. Additionally, the Alliance reported on its progress in achieving its baseline commitments.

Digital Literacy

Target

To equip 471,000 children and youth with digital literacy skills by 2025

In the MENA region, widespread digital connectivity has transformed access to information and development opportunities. However, this advancement has also highlighted significant disparities in digital literacy and internet navigation. While more people are online than ever before, many still face challenges in accessing and effectively using digital resources. Inequities in digital literacy hinder individuals' ability to fully benefit from the internet, contributing to broader social and economic inequalities. Addressing these gaps is crucial for ensuring that all individuals can navigate the digital world confidently and access the opportunities that come with it.

Zain Jordan: B12

Zain Jordan, in collaboration with UNICEF, has been advancing the B12 learning platform since 2021, benefiting 24,000 students by enhancing access to quality education. Supporting both in-class and distance learning, B12 offers an advanced learning management system that empowers schools to adapt to modern educational needs. This ongoing initiative aligns with Zain's commitment to fostering digital transformation, expanding internet access, and positioning itself as a leader in the education sector, while driving societal improvement.

Zain Saudi Arabia: Aanab & Code School Finland partnership

Since 2022, Zain KSA partnered with Aanaab and Code School Finland through an MoU to promote digital education and literacy. This global-local partnership aims to empower and localize digital education efforts. The initiative trained 700 teachers, resulting in over 28,000 youth beneficiaries. By focusing on coding skills, the program provides certificates to teachers who complete the course and enhances coding skills among youth, fostering a digitally skilled generation ready to meet future challenges.





Youth Unemployment

Target

Reach unemployed youth through training, developing skills, conducting workshops, and mentorship opportunities

Foster the startup community and capture jobs generated

In today's world, where socio-economic instability and geo-political conflicts threaten our security, addressing youth unemployment and fostering job creation is more crucial than ever. With the MENA region's youth unemployment rate estimated to be the highest in the world, this challenge underscores the urgent need for comprehensive strategies that integrate education, skills development, and employment opportunities. Tackling youth unemployment not only addresses immediate economic concerns but also promotes long-term stability and growth, ensuring that the next generation can actively contribute to and benefit from a more resilient and cohesive society.

Zain Sudan: Vocational Training

In response to rising youth unemployment and displacement due to political instability in Sudan, Zain Sudan launched a vocational training program aimed at empowering Sudanese individuals with practical skills to enhance their employability. Conducted in collaboration with external partners, this initiative underscores our commitment to creating sustainable livelihoods and fostering economic resilience. The program is delivered entirely in-person, providing hands-on training tailored to align with market needs. Key areas of training include repairing mobile phones, troubleshooting electronic devices, and other technical skills that directly address labor market demands. These practical sessions ensure participants are equipped to enter the workforce with confidence and competence. Since its inception, the program has successfully trained 1,256 individuals across Egypt and Sudan, equipping participants with competencies to secure meaningful employment.



Zain Iraq: Maharatech

Combatting youth unemployment is a key focus for Zain. In 2024, Zain Iraq launched the MaharaTech competition to develop young people's technical skills and prepare them for future employment. Over three months, 30 students from five universities gained expertise in data automation, digital communication, and marketing research while creating tech solutions to address the education sector's challenges. This initiative also promotes entrepreneurship, empowering participants to build their careers and contribute to their communities.



Task Force on Climate Related Financial Disclosures



The following section addresses Zain’s response to the Task Force on Climate-Related Financial Disclosures (TCFD) in alignment with the guidance on the framework. The section represents a detailed response to Zain’s approach towards TCFD’s recommendations.

Zain’s Climate Action Journey



First Sustainability Report published	Completed first five-year target cycle	Aligned the CO₂ emission factors to IEA Standards Set new CO₂ emissions reduction targets for five years	Updated Zain's Environmental and Social Management Plan to include IFC recommendations	Became a member of the GSMA Climate Action Task Force Disclosed to CDP - private
2012	2016	2017	2018	2019
Disclosed to CDP - public Established a Climate Action Committee (CAC)	Plan to introduce Internal Carbon Pricing (ICP) Plan to commit to SBTi Published Zain's Climate Change Policy	Developed the Climate Change Compliance Framework (approved by the Board) Formal commitment letter approved by SBTi and received acceptance letter on January 6, 2023 Set new CO₂ emissions targets for five years	Board approved waste management policy Submission of Science-Based Targets to the Board for approval The joint creation of Sustainability Innovation Hub under the GCC Telco Alliance	Board approved Waste Management Compliance Framework Zain's Science-Based Targets have been approved by the Science-Based Targets initiative (SBTi)
2020	2021	2022	2023	2024



Governance

A. Describe the Board’s oversight of climate-related risks and opportunities

The Vice-Chairman of Zain Group’s Board of Directors (BoD), who is also the CEO of the company, is responsible for setting the strategic direction for the company. He is also responsible for the implementation of the company’s strategy, which includes climate change-related adaptation and mitigation plans. Zain performs an annual review of its five-year business plan to align future investments with its strategic direction set by the Board. The revised five-year business plans and annual budgets are consolidated and submitted to the Board for approval at the end of each year. These plans and budgets include capex requirements for the implementation of energy-saving initiatives that would help achieve the company emissions targets. Throughout this process the CEO oversees and guides the development of Zain’s climate transition plan.

As part of the governance process, Zain’s Board reviews and approves the business plans and budgets submitted annually by the Group CEO, which become the reference for the execution of the company’s strategy. The Board, through the Group CEO, monitors the implementation of all initiatives including those related to climate change mitigation and adaptation. The Group CEO has given the responsibility of managing day-to-day climate-related issues to the Group Chief Sustainability (CSO) and Group Chief Technology Officers (CTO) who co-chair the Climate Action Committee (CAC), and whose role is to ensure the approved climate change mitigation and adaptation initiatives are properly implemented. The CSO & CTO report directly to the Vice-Chairman and Group CEO who in return reviews Zain’s climate-related performance and provides guidance to the

CAC through its co-chairs for preventive and corrective actions when required to ensure that the company meets its targets.

The CAC is a cross-functional committee appointed following an internal consultation process, with the purpose of providing the Board with oversight into climate-related matters. Through the CSO and CTO, the CAC provides recommendations to the Board on how to manage climate-related risks and opportunities. The Board reviews and approves the recommendations from the CAC, and these approvals are reflected by the CAC in the company strategy for identifying, assessing, and managing climate-related risks and opportunities.

The CAC meets quarterly to discuss climate-related risks and opportunities that are immediately reported to the Board through the Group CEO, who provides recommendations and guidance. The reports to the Board by the CAC are done during regular quarterly Board meetings, whereby all management issues are also discussed. Board decisions on reported climate-related issues are made as frequently as needed, with the quarterly reviews focusing on ensuring that the company is meeting its climate specific key performance indicators (KPIs) in terms of greenhouse gas (GHG) emission levels, fuel and electricity consumption, waste management, and public awareness on climate change. By monitoring such KPIs on a quarterly basis, the Board can assess, evaluate, and support the company’s performance regarding climate change-related issues. In addition, the Board has a clearer viewpoint of the progress the company is making in this regard.

Zain provides its management team with incentives for its contribution to helping achieve its environmental commitments and transition goals as set in the Board’s approved climate change compliance framework. This framework outlines the strategic path to achieving net-zero emissions by 2050. The objectives and KPIs within the framework are disseminated to team members at both the Group and opco/subsidiary

levels. All stakeholders, including opcos/subsidiary CEOs, CAC members, and employees responsible for supporting climate targets, are assigned clear climate action objectives. The company conducts an annual assessment of its management team’s overall performance, including climate change mitigation and adaptation efforts. This assessment determines monetary rewards based on the progress towards achieving the predetermined objectives.

B. Describe management’s role in assessing and managing climate-related risks and opportunities

The Board, through the Group CEO sets the direction that shapes the strategy of the company for addressing climate change. All management issues including climate-related matters such as the company’s CO₂ emission reduction targets status, risks associated with ambient temperature increase, the possible changes in precipitation pattern, as well as the transition to new technologies due to climate change. These issues and more are the responsibility of the Group CEO, who delegates the day-to-day operations and control of climate-related issues to the CAC co-chaired by the CSO and the CTO.

Below is a summary of the roles and responsibilities of each major management function within the CAC:

- i. Chief Financial Officer (CFO): Manages annual budgets related to environmental issues, reviews climate-related initiatives business cases and approves associated project budgets. Manages capital requirements and reviews decisions about investments in new technology such as the use of renewable energy and the deployment of energy efficient solutions.
- ii. Chief Technology Officer (CTO): Oversees the selection, testing, and implementation of new technologies within the company. To ensure

that transition risks and opportunities such as the deployment of energy efficient solutions are properly managed, the CTO’s contribution is key. He is responsible for energy efficiency improvements and energy use. He also measures and reports energy use against targets. The CTO sets emissions-related KPIs and monitors the implementation of low emissions solutions. The CTO co-chairs the CAC with the CSO. Both CTO and CSO provide an oversight to the Board into climate-related issues and ensure that recommendations from the Board are considered in the company’s strategy for addressing climate-related issues.

- iii. Chief Sustainability Officer (CSO): This executive has a central position with respect to Zain’s climate agenda. The CSO strategically drives the company’s net-zero ambition by ensuring that all value chain emissions are properly addressed through a framework that runs from the emissions boundary to the scopes; the timeline; and the engagement with suppliers and local authorities. The CSO has day-to-day responsibility for the implementation and reporting of all climate-related issues within the company. She provides guidance and recommendations for climate change and sustainability strategy, monitors climate-related KPIs (emissions, renewable energy objectives, climate awareness and engagement), and climate-related incentives. The CSO co-chairs the CAC with the CTO. Both CSO and CTO provide an oversight to the Board regarding climate-related issues and ensure that recommendations from the Board are considered in the company’s strategy for addressing climate-related issues.
- iv. Chief Risk Officer (CRO): Identifies and quantifies climate change risks and opportunities, performs scenario analysis, prepares mitigation plans for the identified risks, monitors them, and ensures an appropriate response whenever they materialize. Annually, the CRO ranks these risks to prioritize them and provides recommendations for mitigation and adaptation.

- The CRO identifies and quantifies climate change risks and opportunities, performs scenario analysis, prepares mitigation plans for the identified climate change risks, monitors those risks, and ensures proper response whenever the risks materialize.
- The CRO ranks the risks on an annual basis to prioritize them and provides recommendations for mitigation and adaptation.
- On a quarterly basis, the CRO reports the status of all the identified risks, including climate change-related risks to the BRC.
- The BRC reviews the risks and sets priorities for mitigation and adaptation when required.
- Those priorities are part of the recommendations that the Board provides to the CAC through the Vice-Chairman and Group CEO.



Strategy

The information included below reflects figures and analysis for 2024.

A. Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long-term.

	From (years)	To (years)	Comment
Short-term	1	3	The short-term time horizon is aligned to the company’s business planning process. The short-term business plan considers this period for the operational risks arising due to climate change events that need to be addressed to enhance services to remain competitive throughout markets. The normal life-time of some of our assets such as diesel generators used on off-grid sites is approximately three years, hence, we consider three years to be a reasonable period for assessing the impact of physical risks on such assets. From a financial and strategic perspective, Zain’s short-term horizon is focused on development and achievement of revenue forecasts, cost and profitability targets.
Medium-term	3	5	The medium-term time horizon is aligned to medium-term business planning process that uses a five-year horizon period for the operational risks arising due to climate change events. This period is also in line with the life-time of other assets such as the deep cycling batteries, which are used to mitigate the risks associated with some of the physical and transition risks. Zain’s five-year business plan is prepared every year while monitoring the progress of the previous year’s five-year plan’s execution. The business plan is updated with actual figures for the first year and the revised forecast for four years, subsequently an incremental year is added.
Long-term	5	15	The long-term business financial planning process is planned over 5 - 15 years to align with Zain’s goals of climate change initiatives. A significant portion of the company’s assets, including cooling systems, DC power systems, radio systems, and other active equipment in transmission and core sections, are gathered during this specific time-frame. The impact of physical risks on such assets is evaluated and mitigated to ensure that the company remains competitive in its markets of operation. From a strategic perspective, a business plan entails the long-term horizon and is focused on a forecast of cashflows and revenue potential from the initiatives that Zain identifies as part of the organization’s strategy.

Risks identified as input to the Strategies for scenario planning

Transition risks: Increase in energy tariffs

During the assessment of climate-related risks for core site, offices, and base station facilities, Zain identified that there could be an increase in operational expenditure due to fuel tariff hikes and grid power units in areas of operations.

The biggest operating costs are energy-related to cater for cooling requirements for telecom and IT systems that require temperatures of approximately 23°C for optimum performance, which is much lower than ambient temperatures in Zain’s markets of operation. Our total energy consumption in 2024 was 118.5 Mn liters of diesel and 1,189.7 GWh grid across Zain’s operations.

The 2024 overall energy cost for the calendar year 2024 was USD 175.74 Mn.

For the SSP2 – 4.5 2039 scenario, we estimated that energy operating costs could increase by over 60% to USD 281 Mn.

The increase in costs is primarily due to:

1. Rise in energy tariffs due to inflation
2. Rise in mean temperatures

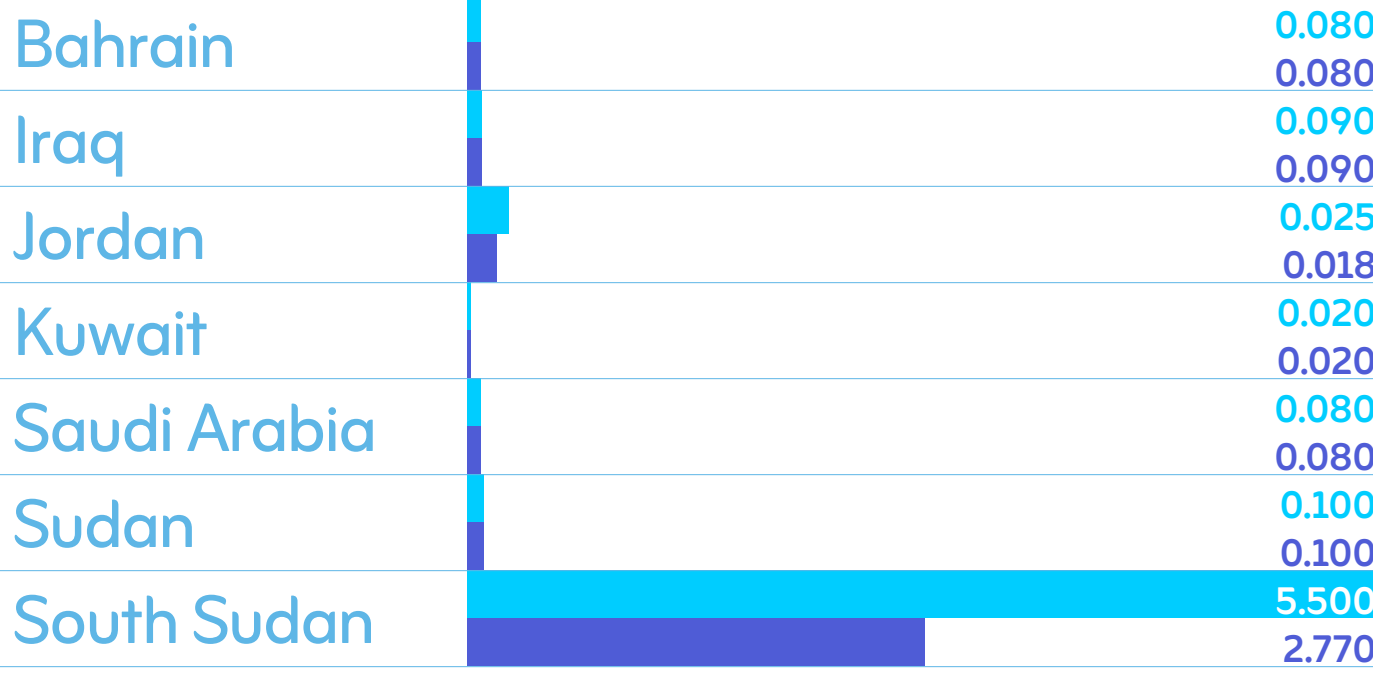
We estimate the increase in tariffs per liter of diesel and per kWh of grid power as per inflation rates in each of Zain’s operating entities due to varying macroeconomic profiles.

Physical Risks: Rise in Mean Temperature

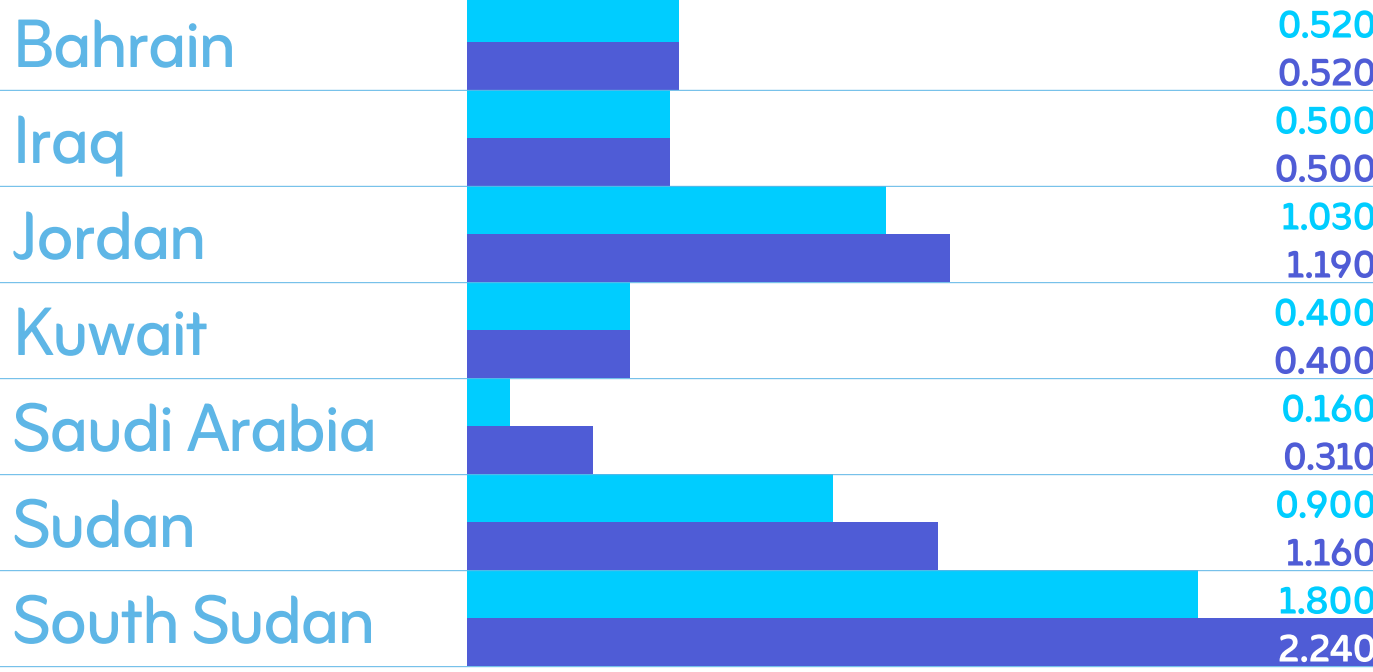
In the Middle East and North Africa (MENA), we experience extremely hot weather temperatures, which led to energy consumption increases in 2024. According to multiple studies, including the projections of the World Bank Group (WBG), the MENA region will continue to face increasingly high temperatures for longer periods under current scenarios (SSP2 4.5 - means business as usual).

As an example, in 2023, the cost for cooling sites, data centers, and office premises in KSA was USD 27.1 Mn, which rose 10.97% to USD 30.1 Mn in 2024 due to an increase in diesel prices.

Grid price (USD) per unit kWh



Diesel Fuel price (USD) per liter across OpCos



Opportunities Identified

Returns on investment in low emission technology

Zain noticed that it could achieve savings in energy consumption by reducing dependency on fossil fuels, which would lead to CO₂ emissions and opex reductions. The driver for this initiative was the erratic availability and pricing of diesel in Zain’s markets, especially in Sudan and South Sudan.

The availability of a reliable universal grid supply is essential for economic growth and the alleviation of poverty.

While the South Sudanese government’s desire to modernize and extend on-grid coverage and introduce additional generation capacity is commendable, until such time when a stable political and conflict-free environment exists in the country, the current challenging state of the nation’s main utility supply is likely to persist for the foreseeable future.

To address the power challenge, Zain deployed green power solutions such as battery-hybrid solutions, solar systems, outdoor equipment, connection of base station sites to the grid and performed site-sharing deployments with other MNOs. The strategy followed by Zain is to transform the identified physical and transition risks into opportunities by responding in a way that helps reduce operating costs with payback periods that do not exceed six years. The implementation of energy efficient solutions has led to a reduction of our Opex of USD 11.4 Mn in 2024. The benefits of such initiatives will continue for at least five more years (during the life-time of the equipment that was deployed). Zain reduced by 28,247 metric tons in 2024. The opportunity refers to Zain’s broader operations. We highlighted Iraq, Sudan, and South Sudan as these opcos represent the major beneficiaries of this opportunity due to grid availability and cost of diesel due to devaluation of the local currencies.

B. Describe the impact of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning.

The success of risk management will depend on the effectiveness of the management framework providing the foundations and arrangements that will embed it throughout the organization at all levels. The risk management framework operates at varying levels and within specific contexts of the organization. The framework ensures that information is adequately reported and used as a basis for decision-making and accountability at all relevant organizational levels.

The Group Enterprise Risk Management team develops an annual risk plan to include all Zain opcos for the purpose of scheduling periodic risk assessment exercises. During the assessment for a particular opco, the leadership of commercial and corporate divisions, and technology, define their risk attitude, including climate-change risks, which may affect their businesses. Risk severity is reviewed to ensure alignment and acceptability.

As per risk management methodology, Zain’ risk assessment impact matrix has a five-point scale based on financial indicators, namely revenue, capex intensity, and operational EBITDA margins. The highest impact grading is “extreme,” which would be applicable for an event when its financial impact exceeds the most significant thresholds. For substantive financial impact, we identified thresholds to determine if a risk has the potential to significantly affect the company and needs to be reported.

Zain’s risk management corporate policy defines an acceptable risk as the degree of exposure that the company is ready to accept in as much as it allows the creation of value, achieving the right balance between growth, performance, and risk. This threshold is considered when reviewing the strategy to ensure we operate within the established risk appetite.

The following are the thresholds for substantive or high financial impact as per Zain’s risk matrix:

- Whenever there is a risk that results in an impact on gross revenue of more than 4% of opco’s annual revenue.
- When capex intensity planned for the fiscal year exceeds 10% (where capex intensity is the ratio between capex to revenue).
- When the impact of the risk event exceeds EBITDA margins of the opcos by more than 3%.

C. Describe the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.

Climate-related Scenario	Scenario Analysis Coverage	Parameters, assumptions, analytical choices
Transition Scenario IEA 450	Company-wide	Temperature alignment: The company explored changes in energy costs under one of the IEA scenarios, namely the IEA 450, which is aligned with temperature increases to or below 2°C compared to pre-industrial levels. Parameters, assumptions, and analytical methods increases in energy tariffs will lead to an increase in energy costs for the operation of telecom/IT sites. During the assessment of climate-related risks for data center locations, offices, and base station sites, Zain identified that there could be an increase in operational expenditure due to tariff hikes for fuels and grid power units in areas of operation. Energy prices are subsidized in oil rich operations in Kuwait, Saudi Arabia, and Bahrain. The biggest operating costs are energy-related to cater for cooling for telecom and IT systems, which require temperatures of 22°C, which is much lower than the average ambient temperatures in these markets. Zain’s total energy consumption in 2024 was 118.5 Mn Liters and 1,189.7 GWh, the overall energy cost for the calendar year was USD 175.74 Mn which is a 7% drop from 2023. The company also consumed less diesel in 2024, as the consumption was 128.2 Mn liters in 2023 down 7.5% YoY, compared to 119 Mn liters in 2024. Overall energy costs including diesel in 2024 were USD 175.74 Mn. With our long-range planning process of 15 years, we estimate that energy operating costs could increase by over 60% to USD 281 Mn. The estimated figures factor in the underlying per unit grid power and diesel fuel hikes as per macroeconomic indicators due to inflation and gradual reduction of subsidies. The estimates are based on consumption for the 2024 calendar year. The increase in costs is primarily due to two main variables: 1. A rise in energy tariffs due to inflation and reversal of subsidies in some operations, and 2. A rise in mean temperature. Zain chose the SSP 5 8.5 scenario to estimate the likely outcome if the governments in our operating countries do not make concerted efforts to cut GHG emissions. We took the net present value with a discount rate of 4% to arrive at USD 87.3 Mn, which when compared to 2023 EBITDA will be graded in the high category due to a financial impact of 3.3% to 2023 EBITDA figure.

Climate-related Scenario	Scenario Analysis Coverage	Parameters, assumptions, analytical choices
Physical Climate Scenarios SSP 5 8.5	Company-wide	This business-as-usual scenario (SSP 2 4.5) assumes temperature increases by 0.92°C by 2039 and 1.6°C by 2059 compared to pre-industrial level. Parameters, assumptions, and analytical methods: Zain relies on World Bank Group (WBG) forecasts, that use data from the CMIP6 models included in the IPCC - AR5 as a reference to help project climate change states for the entire company. Two-time horizons were considered: 2020 – 2039 and 2040 – 2059. These two horizons are the default horizons proposed by the WBG using the CMI6 models for climate change projections. Within these horizons, and considering a linear progression, a 15-year climate change analysis from 2020 to 2035 (main time horizon) was derived to align with Zain’s corporate risk management long-term timescale and the life cycle of its assets. The company explores both physical and transition risks for Zain’s base stations, data centers, and office buildings. As per SSP 8.5 Ensemble, there will be an average temperature increase of 0.99°C by 2039 and 2.19°C by 2059. A vulnerability assessment of Zain’s operations revealed that some of the company’s assets in the eight opcos will consume more power to maintain the same level of temperature because of the positive correlation between external temperatures and energy consumption. To reduce the energy consumption due to increased cooling requirements, a set of initiatives has been developed under one of the strategic pillars which is, “operational effectiveness.” These initiatives helped reduce 4,889 tons of CO₂ emission in 2024.
		Temperature alignment: The company’s ambition is to be net-zero by 2050. To understand the impact of such a move on the business, Zain looked to uncover associated costs. This analysis is based on RCP 1.9 pathway that limits the rise in mean temperature to 1.5°C compared to the pre-industrial era. Parameters, assumptions, and analytical methods: The parameters considered in this analysis are the number of sites, energy consumption per site, and the share of renewable power. The projected energy consumption is based on the number of sites in 2050, against a set of initiatives ranging from the deployment of hybrid battery solutions, outdoor cabinets, and solar power solutions. Although energy consumption is likely to increase, the fact that the share of solar-based power increases at a faster rate helps predict substantial reductions in CO₂ emissions. It is assumed that solar plants will be deployed in operations in Bahrain, Sudan, South Sudan, Kuwait, and Jordan for the company to be able to achieve 80 – 90% reduction of CO₂ emissions by 2050. The remaining 10 – 20% of the emissions will be offset through investments in carbon sinks and the implementation of carbon capture solutions.

Risk Management

A. Describe the organization’s processes for identifying and assessing climate-related risks

The company recognizes that climate change poses several physical and transition-related risks to its business.

The risk assessment process consists of four steps: Risk identification, analysis, evaluation, and treatment: The scope of the risk assessment processes includes all people, processes, and technology within Zain Group and its operating countries.

Risk Identification: Risk owners and the risk management team review the risks specific to the division and identify any emerging issues that are material to the operating environment.

Risk Analysis: For the identified risks, impact of the risk event is based on the likelihood of occurrence and the impact severity of the identified risk events.

Risk Evaluation: For the identified risks, the management team assigns risk owners who perform detailed root cause analysis of their respective risk and take actionable steps.

Risk Treatment: Mitigation plans are agreed between the risk manager and the risk owners. Opco risk managers present the status of current and proposed plans for the approval of opco CEO. Once the mitigation plans are approved by the respective CEOs, risk managers share the risk register with the Group risk management team.

Climate change risks are considered in Zain’s risk universe as defined in Zain’s Risk Management Policy and included in the company’s risk assessment and evaluation. The Climate Change Risk process monitors both physical risks and transition risks.

Risks & opportunities Identification & assessment

The climate risks and opportunities identification process follows a bottom-up approach by advising opcos based on analysis of historical and projected data related to physical and transition risks and opportunities.

Risk assessment exercises are conducted annually, where the Group Risk Management team identifies risks across short-, medium-, and long-term timeframes. Risks arising from climate change impact on operations, and macroeconomic factors are some of the long-term risks in the company’s register.

Risks are quantified based on the likelihood and impact as per the risk management criteria for revenue, EBITDA, and other metrics.

B. Describe the organization’s processes for managing climate-related risks.

For managing climate-related risks, energy sources are closely monitored. Fuel and electricity consumption patterns are analyzed to assess variations. In case the energy consumption increases more than 10% quarter-on-quarter, the concerned opcos are required to provide details and justifications for such changes.

The Coupled Model Intercomparison Project, Phase 6 (CMIP6) models included in the IPCC’s Sixth Assessment Report (AR6) were referenced. Global warming of 1.5C relative to 1850–1900 would be exceeded in the 21st Century under the intermediate, high, and very high GHG emissions scenarios considered in this report (SSP2-4.5, SSP3-7.0 and SSP5-8.5, respectively). For the analysis, Zain selected the following SSP scenarios: SSP1 – 1.9: Sustainability Road, SSP2 – 4.5: Middle of the Road, SSP5 – 8.5: Fossil fuel development.

The following estimations were taken per opco:

SSP1 1.9 2039 and 2050: Kuwait (0.25, 0.25), KSA (0.27, 0.27), Bahrain (0.38, 0.38), Iraq (0.25, 0.25), Jordan (0.16, 0.16), Sudan (0.14, 0.14) and South Sudan (0.22, 0.22).

SSP5 8.5 2039 and 2050: Kuwait (1.06,2.33), Saudi Arabia (1.1, 2.41), Bahrain (0.99, 2.15), Iraq (1.18, 2.52), Jordan (1.06, 2.3), Sudan (0.9, 2.03), South Sudan (0.68, 1.59).

SSP2 4.5 2039 and 2050: Kuwait (0.98, 1.76), Saudi Arabia (1.02, 1.79), Bahrain (0.86, 1.55), Iraq (1.1, 1.86), Jordan (1.02, 1.71), Sudan (0.86, 1.54), South Sudan (0.65, 1.26).

The timeframes include Zain’s net-zero timeline, but the analysis went beyond 2050 to provide an understanding of the extent to which the business could be impacted in the long run.

Knowing the total cooling energy requirement for the previous year, Zain can estimate the total energy consumption increases that would result from the impact of that physical risk. When mapped to Zain’s risk criteria, this is Moderate as it represents approximately 1.96% of annual EBITDA.

The risk is said to manifest across all seven countries of operation, as the underlying energy consumption data is an aggregate from operations.

To reduce energy consumption due to increased cooling requirements, a set of initiatives have been developed under one of our company’s strategic pillars which is “the operational effectiveness”. In 2024, Zain deployed a total of 189 outdoor cabinets across Bahrain, Kuwait and South Sudan for a cost of 1.7 million USD. These initiatives have led to a reduction of 28,610 metric tons in 2024 of CO₂ emission. It is expected that the emissions’ reductions will continue for at least five more years.

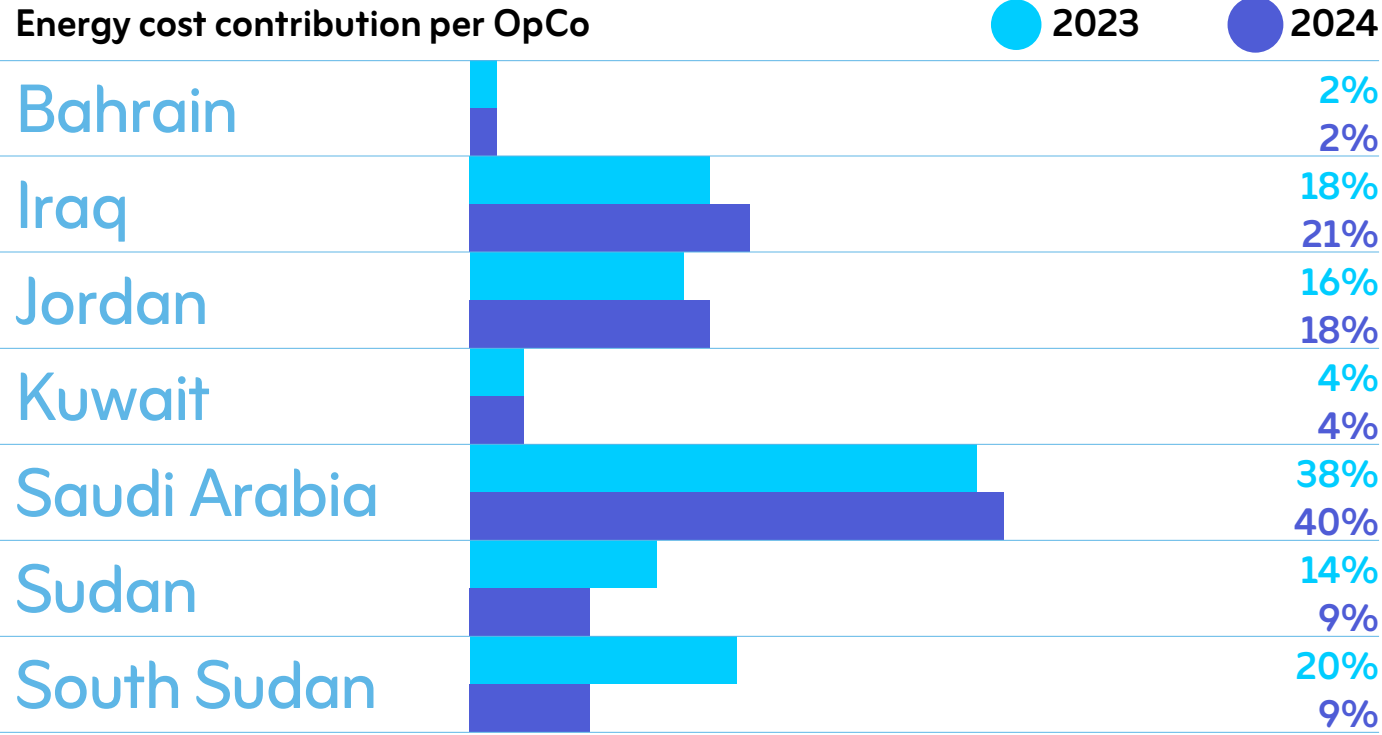
C. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management.

Zain is presenting a case study of a climate change risk, its impact, and the mitigation strategies.

Risk 1: Transition Risk: Increases in energy tariff will lead to an increase of energy costs for the operation of Zain’s telecom/IT sites.

During the assessment of climate-related risks for Zain’s core site, offices, and base station facilities, it was identified that there could be an increase in opex due to fuel tariff hikes and grid power units in Zain’s areas of operations.

The biggest operating costs are energy-related to cater for cooling requirements for Zain’s telecom and IT systems that require temperatures of approximately 23°C for optimum performance, which is much lower than ambient temperatures in Zain’s markets of operation. Our total energy consumption in 2024 was 118.5 million liters of diesel fuel and 1,189.7 GWh electricity across Zain’s operating entities. The 2024 overall energy cost for the calendar year was USD 175.742 million.

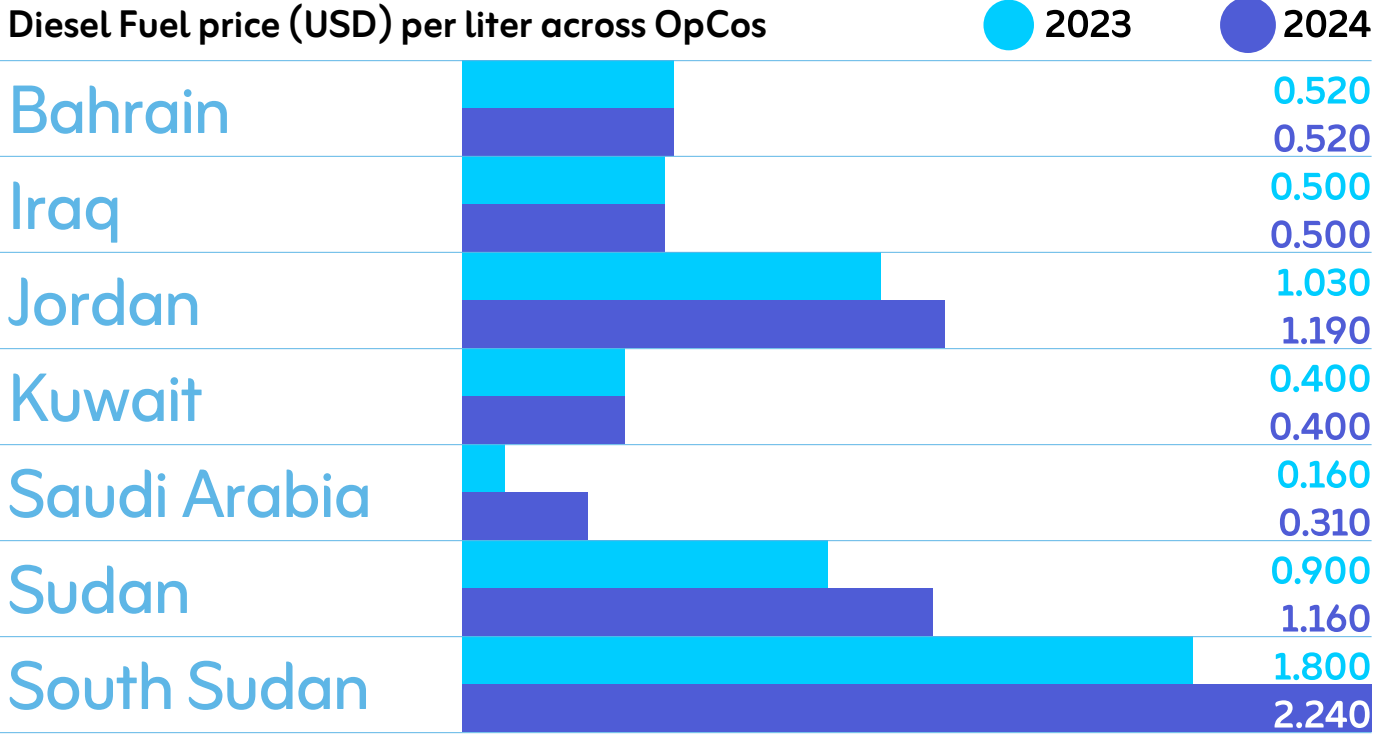
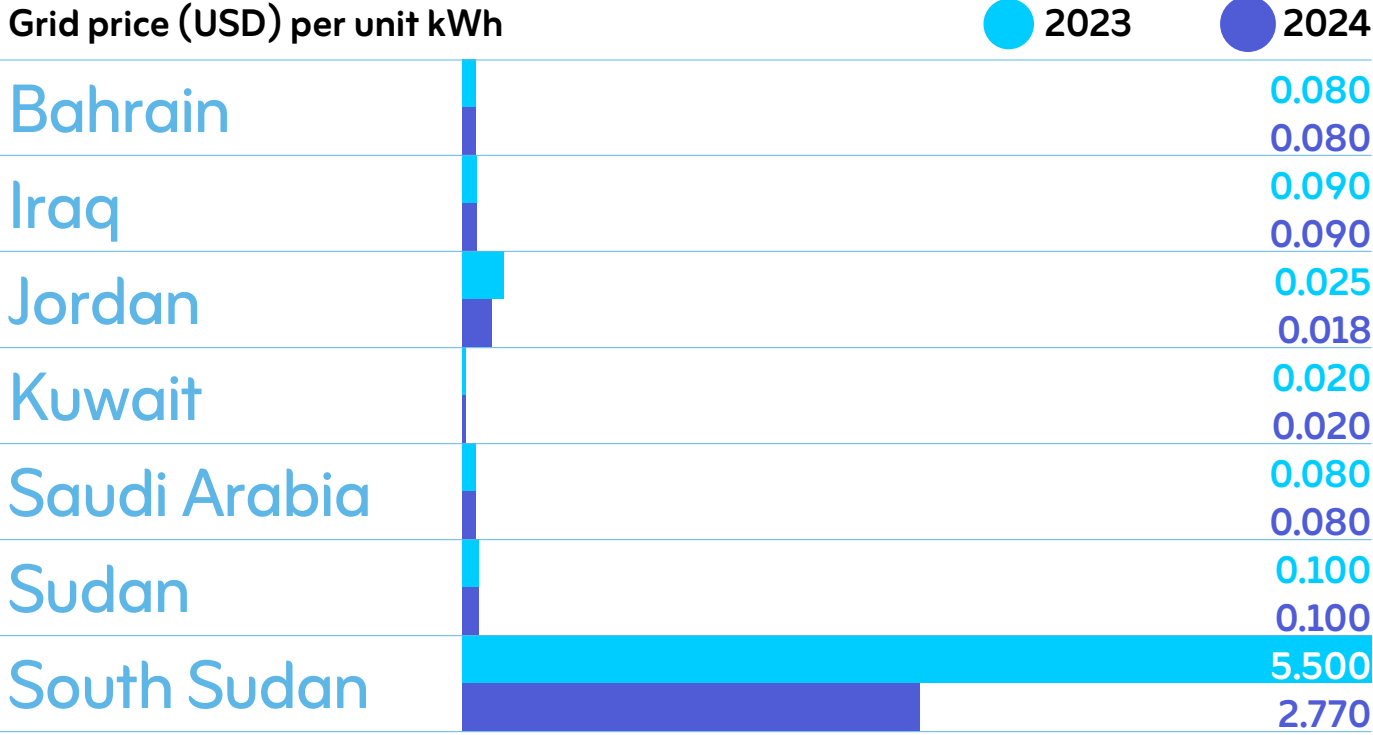


For the SSP2 – 4.5 2039 scenario, it is estimated that energy operating costs could increase by over 60% to **USD 247 million**. The estimated figures factor in the underlying per unit grid power and diesel fuel hikes as per macroeconomic indicators due to inflation and gradual reduction of subsidies.

The increase in costs is primarily due to:

1. Rise in energy tariffs due to inflation
2. Rise in mean temperatures

Zain estimates the increase in tariffs per liter of diesel and per kWh of grid power as per inflation rates in each of the company’s operating entities due to varying macroeconomic profiles.



Mitigation

Zain’s guidelines for network deployment mandate that sharing its passive infrastructure with other operators is the first course of action before exploring other options. Generally, site sharing results in savings in energy consumption because of the optimum utilization of power systems. At the same time, in countries such as Sudan and South Sudan where most of Zain’s base stations are running on diesel generators due to lack of stability of the grid, being able to reduce fuel consumption would have the double advantage of reducing the energy cost and reducing emissions. Based on previous year electricity tariffs and fuel prices, and data analysis for Zain’s opcos, we have estimated that if the trends continue, the operating cost of Zain’s base stations will double by 2035. As an example, most of the sites in Sudan and South Sudan are powered by diesel generators. This means that if the fuel cost increases, the energy cost will increase as well. To mitigate, the company deployed 39 solar solutions and 52 battery-hybrid power solutions in 2024. This represents approximately a 60% reduction in fuel consumption over a period of five years from the year 2024.

To mitigate the risks associated with additional energy costs, Zain has developed a set of initiatives ranging from infrastructure sharing to the deployment of green power solutions, and the use of smaller size diesel generators.

Metrics and Targets

A. Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.

The information included below reflects figures and analysis for the years 2023 and 2024.

Metrics used by Zain include emissions, energy consumption, and capital deployment.

Metrics	Performance	
	2023	2024
Energy		
Diesel Fuel Consumption (Liters)	Diesel fuel consumption decreased by 6% Y-o-Y across all operations.	Diesel fuel consumption decreased by 7.5% Y-o-Y across all operations.
Grid Consumption (KWh)	The total electricity consumption increased by 3% across all operations	The total electricity consumption increased by 2.8% across all operations
Average Fuel price per Liter	Bahrain - 0.52 Iraq - 0.5 Jordan - 1.03 Kuwait - 0.4 Saudi Arabia - 0.16 Sudan - 0.9 South Sudan - 1.8	Bahrain - 0.52 Iraq - 0.5 Jordan - 1.03 Kuwait - 0.4 Saudi Arabia - 0.4 Sudan - 1.6 South Sudan - 2.24
Average Grid unit price	Bahrain - 0.077 Iraq - 0.09 Jordan - 0.25 Kuwait - 0.016 Saudi Arabia - 0.08 Sudan - 0.1 South Sudan - 5.5	Bahrain - 0.077 Iraq - 0.09 Jordan - 0.18 Kuwait - 0.016 Saudi Arabia - 0.08 Sudan - 0.1 South Sudan - 2.77
Capital Deployment		
Investment in climate mitigation	42 infrastructure sharing sites for USD 178,000, deployment of 206 outdoor cabinets for USD 4.9m, the deployment of 13 smaller size diesel generators, the implementation of 242 solar solutions and 96 hybrid battery solutions, as well as the connection of 123 sites to commercial power for USD 4.01m.	85 infrastructure sharing sites for a cost of USD 417,765 - The deployment of 189 outdoor cabinets for a cost of USD 1.74 million - The installation of 614 DG-Battery Hybrid solutions, 17 smaller-size generators, and 20 free cooling systems for a total cost of USD 501,218 - Implemented 163 solar hybrid solutions for a cost of USD 4.19 million - Connected 192 sites to commercial power for a cost of USD 923,622

B. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 GHG emissions and the related risks.

The following tables summarize the GHG emissions and related risks for Q3 2023 across Zain Group.

Scope of emission	Unit	Total
Scope 1 emissions	tCO ₂ e	330,115,856
Scope 2 emissions	tCO ₂ e	662,079,802
Total Scope 1 & 2 emissions	tCO ₂ e	992,195,658
Total Scope 3 emissions	tCO ₂ e	502,137

Emissions risks:

Scope	Related Risks	Summary
Scope 1 emissions	Increase in consumption of diesel.	Sporadic availability of grid across operations due to natural or man-made events may entail an increase in diesel consumption as a backup energy source. As 5G is launched across operations and coverage of 4G sites increases, there could be an increase due to the demand of fuel for the greenfield sites.
Scope 2 emissions	Increase in consumption of grid power.	As 5G is launched across the operations and coverage of 4G sites increases, the primary energy source is grid power, which could lead to further increase in consumption and incremental emissions.
Total Scope 3 emissions	N/A	Increases in the use of fossil fuel-based energy or non-decarbonized sources of energy by our value chain suppliers and partners could increase both upstream and downstream emissions.

C. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

Initiatives	Target	Narrative
Enhance share of renewable power source	2.5% increase per year.	The current energy source mix between fossil fuel and renewable sources is 90.94% and 9.06%. We intend to increase this mix by 2.5% annually to reduce Scope 1 and 2 emissions.
Scope 2 emissions	4.2% CO ₂ emission reduction per year.	As 5G is launched across operations and with the addition of 4G for enhancing cellular coverage, the primary energy source of grid power will witness additional demand, and this could lead to further increase in consumption and incremental emissions.
Virtualization of core network	75% in core.	Core network equipment such as CS Core, PS Core (2G,3G, 4G) and IMS for VoLTE require power on 24*7. The migration from legacy bare metal system design to virtualized core entails benefits of approximately 40% reduction in energy consumption as smaller equipment footprint translates to lower cooling and power consumption.
Digitalization	2.5% per year.	The current mix for prepaid recharges and postpaid payments between online and traditional channels is approximately 35:65. Zain aims to enhance the online segment as this will entail a reduction of branch operation costs due to savings in energy costs at the branches for lighting and air-conditioning.





Looking Forward



The 2024 Sustainability Report, entitled The New Paradigm Shift, highlights Zain’s position in creating value for its stakeholders in an inclusive manner. For Zain, 2024 was a year of transition, as the company started to shift certain aspects of the business to align to context, trends, and stakeholder feedback. To remain responsive to the various market pressures and challenges and be able to thrive, Zain has increased efficiencies, accessed new technologies, and ensured it is generating value for its operating communities.

Throughout the year, Zain reiterated its 4WARD and Corporate Sustainability strategies, which will be further evolved in 2025, building on the tangible achievements to date. The company continued to embed sustainability across all aspects of the business, positioning value creation and integrated thinking principles at the heart of the decision-making processes. This ensures that Zain adopts a holistic approach, avoiding any blind spots and making sure decisions take into consideration the associated trade-offs. The company also embedded its business plan, operational review and sustainability tracker decks into its standardized processes, making sure it considers the short, medium, and long-term aspects of its initiatives across the board.

The company recognizes that its senior leadership plays a role in guiding their teams to continue to embed sustainability as a key business priority. To affirm its commitment to sustainability, Zain conducted its due diligence in 2024 on linking sustainability KPIs to its annual incentives for Zain Group C-Suite demonstrating the company’s structured and collaborative approach in addressing its sustainability strategic objectives.

The table below highlights Zain’s sustainability plans for 2025:

Corporate Sustainability Target	Comments
Set strategic targets to address climate change, reduce greenhouse gas emissions, and conserve nature and biodiversity by addressing risks, unlocking new market opportunities, and improving resource efficiency	- Continued to align across all Group functions, operations, and subsidiaries to ensure full adoption of the Science Based Target Initiative (SBTi) approved emission reduction targets. - Ensure further commitment from suppliers on net-zero alignment. - Track progression on the implementation of waste management compliance framework across operations, subsidiaries and supply chain. - Monitor value created on all biodiversity-related initiatives across each market operation and supply chain. - Collaborate with stakeholders including regulators on policy reform for climate-related regulations and policies.
Aiming to bridge the divides that exist in our operating markets, focusing on marginalized segments	- Implement action plans based on accessibility audits conducted for Zain’s branches and other customer touchpoints such as social media channels. - Track, monitor, and assess the implementation of Zain’s Responsible Marketing and Communications Standards. - Engage with the elderly community to evolve existing services and campaigns that are geared towards them. - Continue to scale Women in Tech program to reach targets set in the Corporate Sustainability strategy and conduct assessments of the program over the past five years.
Ensuring a responsible supply chain across Zain business practices	- Leverage engagement channels with suppliers to embed feedback on future training programs on various sustainability topics. - Develop automation mechanism for supplier assessment on sustainability risks for self-assessment questionnaire and physical audits. - Develop climate-related awareness and alignment for suppliers through training. - Continue to address biodiversity and nature within Zain’s supply chain.
Committing to safeguard and empower 16 million youth across Zain’s footprint, enabling them to reach their full potential	- Continuously evaluate challenges, gaps, and opportunities concerning children’s rights throughout all business operations. - Continue the progression and achievement of KPIs set in the MoUs with national child helplines. - Work towards achieving the commitments set in the GSMA Mobile Alliance to combat Digital Child Sexual Exploitation. - Continue to drive advocacy on children’s rights across Zain’s value chain. - Enhance partnerships with local and international NGOs to develop and implement community-based programs focused on the protection and empowerment of children in vulnerable regions. - Implement ZYxGreenSkills program across all operating markets to advance youth’s skills to address climate change.



Corporate Sustainability Target

Comments

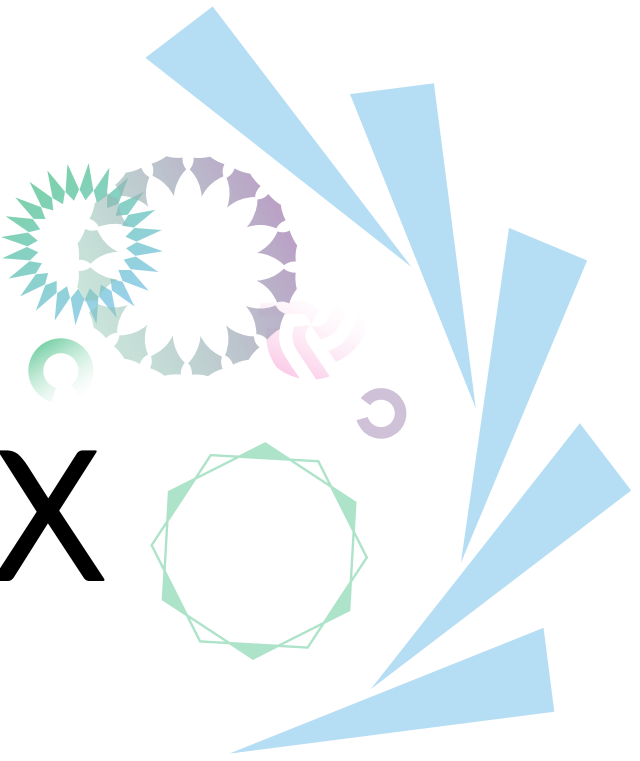
Building human capital within the organization	• Continue to scale the human rights training and ethical standards to cover all full-time, part-time employees, and contractors. • Work towards equal gender ratio for employee training. • Prioritize the Workforce of the Future pillar focusing on training employees in the following areas: analytics, digital enablement, innovation and creativity, leadership, and customer experience.
Expand and improve Zain’s stakeholder engagement strategy across all functions	• The company remains dedicated to enhancing its stakeholder engagement practices through open, effective, and regular communication with key stakeholders. For further information on Zain’s stakeholder engagement, please refer to the ‘Stakeholder Engagement’ section on page 55.
Continue to improve governance policies and practices to maintain compliance with Kuwait’s Capital Markets Authority (CMA) regulations	• Zain adheres to CMA regulations in Kuwait regarding transparency and governance and is actively working to enhance its compliance in line with global best practices.
Continue to optimize the company’s risk management policies and practices	• Zain’s Risk Management and Internal Audit functions work closely with the Board Risk and Audit committees to enhance the organization’s ability to identify and address risks and internal audit findings effectively.
Expand and broaden the organization’s Innovation agenda	• Continue to develop the innovation agenda through subsidiaries such as Dizlee (API platform), ZainTECH, Zain Esports, and Zain Fintech entities, amongst others. • Contribute to national innovation by establishing innovation centers, ZINC in Kuwait, Iraq, and Jordan. • Aim to further enhance the intrapreneurship ecosystem within the company through the ZAINIAC program.
Continue to take steps to address and improve gender and disability disparity and encourage greater inclusivity within the organization	• Pioneering the Inclusion, Diversity, and Equity (IDE) agenda across the board, to further the targets set in each of the IDE focus areas: » WE – tackling gender gaps within the company » WEABLE – supporting people with disabilities in the workplace » ZAINIAC – internal innovation » BEWELL – promoting mental health and well-being » ZY – empowering young Zain employees through skills development, including ZYxGreenSkills » IDEU – Inclusion, Diversity, and Equity University

We look forward to receiving your thoughts and feedback on this report. Kindly send comments and/or questions to group.sustainability@zain.com.





Appendix





ESG Metrics for Mobile

GSMA

ESG METRICS
FOR MOBILE

INDUSTRY REPORTING FRAMEWORK

ESG Metrics for Mobile code	Definition	Time period (calendar year) 2024
GSMA-ENV-01	Disclose if the company has set, or committed to set, GHG emissions targets that are in line with the goals of the Paris Agreement — to limit global warming to well below 2°C above pre-industrial levels and pursue efforts to limit warming to 1.5°C — and to achieve net-zero emissions before 2050	Zain Group’s formal targets have been approved by the Science Based Targets initiative (SBTi). This was formally activated after initially issuing a commitment letter approved by SBTi and receiving an acceptance letter on October 17, 2024.
GSMA-ENV-02	The amount of GHG Protocol Scope 1 and 2 GHG emissions (e.g. carbon dioxide, methane, nitrous oxide, F-gases, etc) produced	992,196
	Percentage change in absolute Scope 1 and 2 emissions	-1.52%
	The amount of GHG Protocol Scope 3 GHG emissions produced	501,218
	Percentage change in absolute Scope 3 emissions	0.93%
GSMA-ENV-03	The amount of energy consumed across the entire business operations	1,699 million MWh
	The amount of energy consumed across the mobile network	1,699 million MWh
	The percentage of network energy consumed that is generated by renewable energy sources	9.06%
	The percentage of network energy consumed that is generated by fossil fuels	70.02%
	The percentage of network energy consumed that is generated by diesel	20.92%
GSMA-ENV-04	The percentage of total network equipment prevented from becoming waste through repair or reuse, by units	Refer to Sustainability Agenda, page 81
	The percentage of total network equipment prevented from becoming waste through repair or reuse, by purchase price	Refer to Sustainability Agenda, page 81
	The percentage of handsets or CPE prevented from becoming waste through repair or reuse, by units	Refer to Sustainability Agenda, page 81
	The percentage of handsets or CPE prevented from becoming waste through repair or reuse, by purchase price	Refer to Sustainability Agenda, page 81
GSMA-ENV-05	Total amount of waste produced across the entire business operations	Refer to Sustainability Agenda, page 81
	Total amount of network equipment waste produced	Refer to Sustainability Agenda, page 81
	Total amount of handset and CPE waste produced	Refer to Sustainability Agenda, page 81
	Total amount of other waste produced	Refer to Sustainability Agenda, page 81
GSMA-ENV-06	The percentage of network equipment waste recycled, by units	Refer to Sustainability Agenda, page 81
	The percentage of handset and CPE equipment recycled, by units	Refer to Sustainability Agenda, page 81
	The percentage of other waste recycled, by units	Refer to Sustainability Agenda, page 81

ESG Metrics for Mobile code	Definition	Time period (calendar year) 2024
GSMA-INC-03	Digital skills training programs must focus on establishing or improving at least one of the basic, intermediate or advanced digital skills identified in the ITU Digital Skills Toolkit	Refer to Sustainability Agenda, page 81
GSMA-INT-01	The total number of data breaches identified during the reporting period,	In 2024, there was 0 reported cases related to breaches of customer privacy, data leaks, theft or loss.
	The percentage of data breaches in which personal data was subject to the data breach	0, None
	The total number of unique customers who were affected by data breaches	0, None
	The number of instances in which a data protection violation resulted in regulatory action of any kind	0, None
GSMA-INT-02	A policy that specifically covers the protection of consumers’ digital rights	Privacy Policy available via link
GSMA-INT-03	A policy that specifically covers the online safety of children and other vulnerable groups	Privacy Policy available via link
GSMA-SUP-01	The commissioning, purchase and management of goods, works and services in a way that reduces or negates negative ESG impacts within the supply chain	Supplier code of conduct is available via link
	The number of core elements of sustainable procurement (as defined by ISO 20400) covered in your sustainable procurement policy	We cover the following: • Human Rights • Labour Practices • Environment • Fair operating practices • Community involvement and development (not included in the supplier code of conduct, however we train our suppliers on various sustainability topics)
GSMA-SUP-02	Percentage of all active suppliers that have been screened against the sustainable procurement policy	2,213 of active suppliers
	Percentage of all active suppliers that have been assessed against the sustainable procurement policy through physical site visits	3% physical audit (59 physical audits across zain operations), 27% self-assessment questionnaire (604 suppliers in total)



SASB - Telecommunication Sector



Topic	SASB Code	SASB Standard/Metric	Section	Comments	External Assurance
	TC-TL-000.A	Wireless Subscribers		42,689	
	TC-TL-000.C	Broadband Subscribers		6,321	
	TC-TL-000.D	Network Traffic		33.43 PByte	
Environmental Footprint of Operations	TC-TL-130a.1	Total energy consumed		6,117,226.52 gigajoules	Yes
		Percentage grid electricity		70.02%	
		Percentage renewable energy		9.06%	
Data Privacy	TC-TL-220a.1	Description of policies and practices relating to behavioral advertising and customer privacy	ENTERPRISE RISK MANAGEMENT		Yes
	TC-TL-220a.2	Number of customers whose information is used for secondary purposes	ENTERPRISE RISK MANAGEMENT		Yes
	TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy		This information is considered confidential, as such Zain does not disclose this indicator.	
	TC-TL-220a.4	1. Number of law enforcement requests for customer information		This information is considered confidential, as such Zain does not disclose this indicator.	
		2. Number of customers whose information was requested			
		3. Percentage resulting in disclosure			
	Data Security	TC-TL-230a.1	1. Number of data breaches	ENTERPRISE RISK MANAGEMENT	
2. Percentage involving personally identifiable information (PII)			ENTERPRISE RISK MANAGEMENT		
3. Number of customers affected			ENTERPRISE RISK MANAGEMENT		
TC-TL-230a.2		Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	ENTERPRISE RISK MANAGEMENT		Yes



Topic	SASB Code	SASB Standard/Metric	Section	Comments	External Assurance
Product End-of-Life Management	TC-TL-440a.1	1. Materials recovered through take back programs, percentage of recovered materials that were, (2) reused, (3) recycled and (4) landfilled	SUSTAINABILITY AGENDA		
Managing Systemic Risks from Technology Disruptions	TC-TL-550a.1	1. System average interruption frequency and		Zain does not yet report on this metric.	
		2. Customer average interruption duration			
	TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	ENTERPRISE RISK MANAGEMENT		
Competitive Behavior & Open Internet	TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations		This information is considered confidential, as such Zain does not disclose this indicator.	
	TC-TL-520a.2	Average actual sustained download speed of		Zain does not yet report on this metric	
		1. Owned and commercially associated content			
		2. Non-associated			
	TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating, and related practices		Zain does not yet report on this metric	



Global Reporting Initiative (GRI)



General Disclosure		Section	Comments	External Assurance
2-1	Organizational details	ABOUT THE REPORT COMPANY OVERVIEW		Yes
2-2	Entities included in the organization's Sustainability Reporting	ABOUT THE REPORT		Yes
2-3	Reporting period, frequency and contact point	ABOUT THE REPORT		Yes
2-4	Restatements of information		There is no significant information restated in the 2024 Report	Yes
2-5	External Assurance	ABOUT THE REPORT INDEPENDENT ASSURANCE REPORT		Yes
2-6	Activities, value chain and other business relationships	ABOUT THE REPORT PRODUCTS & SERVICES		Yes
2-7	Employees	PEOPLE & PURPOSE		Yes
2-8	Workers who are not employees	PEOPLE & PURPOSE		Yes
2-9	Governance structure and composition	CORPORATE GOVERNANCE		Yes
2-10	Nomination and selection of the highest governance body	CORPORATE GOVERNANCE		Yes
2-11	Chair of the highest governance body	CORPORATE GOVERNANCE		Yes
2-12	Role of the highest governance body in overseeing the management of impacts	CORPORATE GOVERNANCE		Yes
2-13	Delegation of responsibility for managing impacts	CORPORATE GOVERNANCE		Yes
2-14	Role of the highest governance body in sustainability reporting	CORPORATE GOVERNANCE		Yes
2-15	Conflicts of interest	CORPORATE GOVERNANCE		Yes
2-16	Communication of critical concerns	CORPORATE GOVERNANCE		Yes
2-17	Collective knowledge of the highest governance body	CORPORATE GOVERNANCE		Yes
2-18	Evaluations of the performance of the highest governance body	CORPORATE GOVERNANCE		Yes
2-19	Remuneration policies	CORPORATE GOVERNANCE		Yes
2-20	Process to determine remuneration	CORPORATE GOVERNANCE		Yes
2-21	Annual total compensation ratio	CORPORATE GOVERNANCE		
2-22	Statement on sustainable development strategy	MESSAGE FROM THE BOARD OF DIRECTORS MESSAGE FROM THE VICE-CHAIRMAN AND GROUP CEO MESSAGE FROM THE CORPORATE SUSTAINABILITY OFFICER		Yes

General Disclosure		Section	Comments	External Assurance
2-23	Policy commitments	CORPORATE GOVERNANCE HUMAN RIGHTS		Yes
2-24	Embedding policy commitments	CORPORATE GOVERNANCE HUMAN RIGHTS		Yes
2-25	Processes to remediate negative impacts	HUMAN RIGHTS		Yes
2-26	Mechanisms for seeking advice in raising concerns	CORPORATE GOVERNANCE HUMAN RIGHTS		Yes
2-27	Compliance with laws and regulations		In accordance with the regulations issued by the Capital Markets Authority (CMA) in Kuwait, material information includes any significant event, transaction, or change affecting the Company's financial position, operations, or stock performance. Zain will have to disclose major transactions (acquisitions, joint ventures, contracts), financial and operational changes (new products, lawsuits, regulatory impacts, fines, and corporate governance updates (management or board changes). Disclosures also cover meeting results, financial statements, trading suspensions, and related party transactions exceeding 5% of assets. Extraordinary events like shutdowns or compensations must be reported. By adhering to these principles, we ensure that our assessments prioritize transparency, market integrity, and regulatory compliance. Only material information within defined parameters is disclosed to prevent market disruption and ensure stakeholders receive relevant and significant updates.	Yes
2-28	Membership associations	COMPANY OVERVIEW ENTERPRISE RISK MANAGEMENT		Yes
2-29	Approach to stakeholder engagement	STAKEHOLDER ENGAGEMENT		Yes
2-30	Collective bargaining agreements		Zain Sudan: Full time employees 100% FOO: Full time employees 24% Part time employees 25% Zain Iraq: Full time employees 5% Part time employees 1%	Yes

Disclosure on Material Topics		Section	Comments	External Assurance
3-1	Process to determine material topics	MATERIALITY ASSESSMENT		Yes
3-2	List of material topics	MATERIALITY ASSESSMENT		Yes
3-3	Management of material topics	MATERIALITY ASSESSMENT		Yes



Number	Material Topics - Based on Materiality Assessment	Section	Comments	External Assurance
Topic Specific Disclosures				
GRI 418 - Customer Privacy				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	ENTERPRISE RISK MANAGEMENT		Yes
GRI 416 - Customer Health and Safety				
416-1	Assessment of the health and safety impacts of product and service categories		In accordance to industry standards, the company ensures that all its products and services are in accordance to health and safety best practices when it comes to network equipment. When it comes to launching new products and services into the market, the company abides by health and safety standards set by the local regulatory entities. Furthermore, the company covers all health and safety impacts of its products and services in its Environmental and Social Management Plan (ESMP) which includes public exposure to Electro- Magnetic Fields, compliance to International Commission on Non-Ionizing Radiation Protection (ICNIRP).	Yes
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services		There has been 0 incidents concerning health and safety of Zain's products and services.	Yes
GRI 405 - Diversity and Equal Opportunity				
405-1	Diversity of governance bodies and employees	CORPORATE GOVERNANCE PEOPLE & PURPOSE		Yes
405-2	Ratio of basic salary and remuneration of women to men	PEOPLE & PURPOSE		Yes
GRI 205 - Anti-Corruption				
205-1	Operations assessed for risks related to corruption		100% of Zain's operations are assessed for fraud risks and violations of the Code of Conduct which include anti-corruption risks	
205-2	Communication and training about anti-corruption policies and procedures	CORPORATE GOVERNANCE	Through its onboarding process, the company communicates its anti-corruption policies and procedures to all new joiners. Furthermore, it ensures that such policies and procedures are accessible to all through the company's internal portal.	Yes
205-3	Confirmed incidents of corruption and actions taken		There were 0 incidents in 2024.	Yes
GRI 202 - Market Presence				
202-1	Ratios of standard entry level wage by gender compared to local minimum wage		This indicator is not relevant to the industry we operate in, as such data is not collected for this measure. The company's pay scales are reviewed on regular bases and adhere to each operating country's labor law guidelines.	
202-2	Proportion of senior management hired from the local community	PEOPLE & PURPOSE		
GRI 413 - Local Communities				
413-1	Operations with local community engagement, impact assessments, and development programs		100% of our operations include local community engagement and development programs	Yes
413-2	Operations with significant actual and potential negative impacts on local communities	SUSTAINABILITY AGENDA	The company aligns to the Zain Environmental and Social Management Plan (ESMP) Guidelines. The ESMP Guidelines were developed to minimize Zain's potential harmful environmental impacts, protect the safety of its surrounding communities and address negative impacts of the company's business activities. The processes in the ESMP Guidelines include reviewing environmental and social risks, notifying local communities before undertaking any installation or maintenance work and issuing policies that address grievance from local community members. Zain's equipment is tested regularly to ensure compliance is maintained with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) for occupational public exposure to electric and magnetic fields, and to guarantee that the public is protected and made aware of EMF zones by restricted access and appropriate signage of Antenna propagation zones that exceed the ICNIRP maximum public level.	Yes

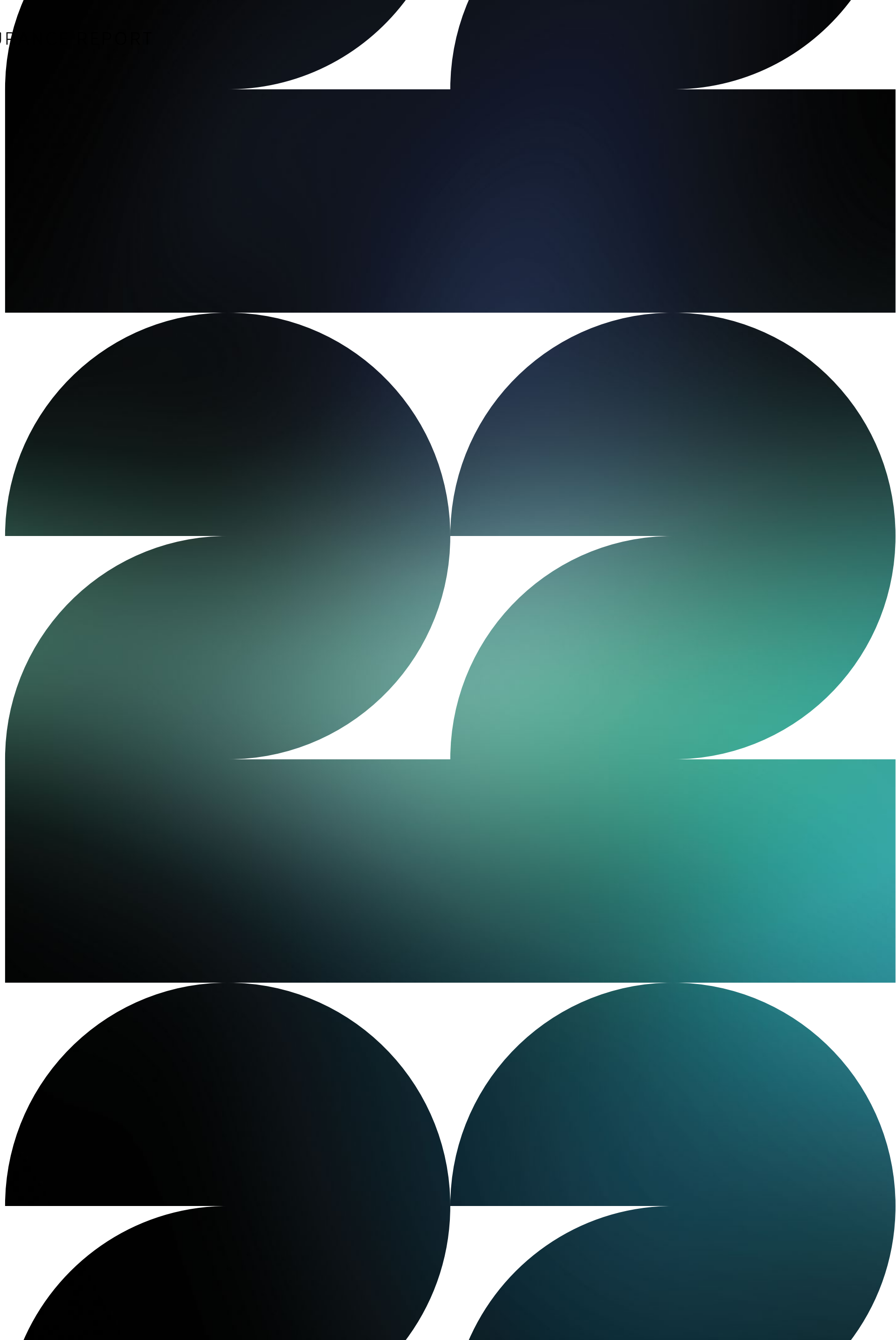


Number	Material Topics - Based on Materiality Assessment	Section	Comments	External Assurance
GRI 204 - Procurement Practices				
204-1	Proportion of spending on local suppliers	PRODUCTS AND SERVICES		Yes
GRI 201 - Economic Performance				
201-1	Direct economic value generated and distributed	PRODUCTS AND SERVICES		Yes
201-2	Financial implications and other risks and opportunities due to climate change	SUSTAINABILITY AGENDA TCFD REPORT		Yes
GRI 305 - Emissions				
305-1	Direct (Scope 1) GHG emissions	SUSTAINABILITY AGENDA		Yes (Reasonable Assurance)
305-2	Energy indirect (Scope 2) GHG emissions	SUSTAINABILITY AGENDA		Yes (Reasonable Assurance)
305-3	Other indirect (Scope 3) GHG emissions	SUSTAINABILITY AGENDA		Yes
GRI 406 - Non Discrimination				
406-1	Incidents of discrimination and corrective actions taken		0 cases were reported in 2024.	Yes
GRI 401 - Employment				
401-1	New employee hires and employee turnover	PEOPLE & PURPOSE		Yes
401-2	Benefits provided to full-time employees that are not provided to temporary or parttime employees		Found in Zain's Financial Statement on Page 30 and 32 on the pdf	
401-3	Parental leave	PEOPLE & PURPOSE		Yes
GRI 308 - Supplier Environmental Assessment				
308-1	New suppliers that were screened using environmental criteria	PRODUCTS AND SERVICES		Yes
308-2	Negative environmental impacts in the supply chain and actions taken	PRODUCTS AND SERVICES	There were no negative environmental impacts identified through Zain's supply chain in 2024.	Yes
GRI 203 - Indirect Economic Impact				
203-1	Infrastructure investments and services supported	PRODUCTS AND SERVICES SUSTAINABILITY AGENDA		Yes
203-2	Significant indirect economic impacts	PRODUCTS AND SERVICES SUSTAINABILITY AGENDA	There were no negative environmental impacts identified through Zain's supply chain in 2024.	Yes
GRI 414 - Supplier Social Assessment				
414-1	New suppliers that were screened using social criteria	PRODUCTS AND SERVICES		Yes
414-2	Negative social impacts in the supply chain and actions taken	PRODUCTS AND SERVICES	There were no negative social impacts identified through Zain's supply chain in 2024.	Yes

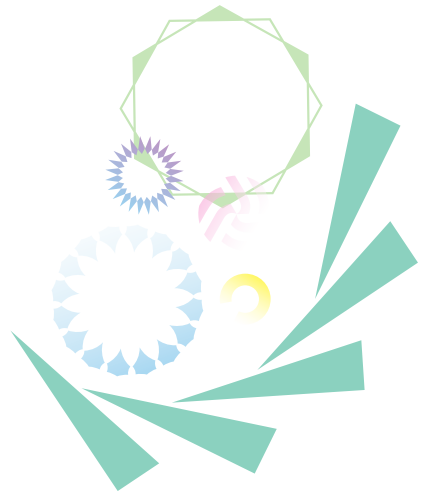


TCFD Recommendations

Recommendations		External Assurance
Governance	a. Describe the board’s oversight of climate-related risks and opportunities.	Yes
	b. Describe management’s role in assessing and managing climate-related risks and opportunities.	Yes
Strategy	a. Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	Yes
	b. Describe the impact of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning.	Yes
	c. Describe the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Yes
Risk Management	a. Describe the organization’s processes for identifying and assessing climate-related risks.	Yes
	b. Describe the organization’s processes for managing climate-related risks.	Yes
	c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management.	Yes
Metrics and Targets	a. Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	Yes
	b. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks.	Yes
	c. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	Yes



Independent Assurance Report





Independent practitioner’s assurance report

To the Board of Directors and Management of Mobile Telecommunications Company K.S.C.P.

Scope

We have been engaged by Mobile Telecommunications Company K.S.C.P. (“Zain Group”) to perform a ‘limited assurance engagement,’ as defined by International Standards on Assurance Engagements, here after referred to as the engagement, to report on material areas / performance metrics (as described below, the “Subject Matter”) in Zain Group’s 2024 Sustainability Report (the “Report”) for the year ended 31 December 2024.

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

Our limited assurance engagement covered disclosures reported in full or partially by Zain Group in the Report against the indicators in the Global Reporting Initiative Sustainability Reporting Standards 2021 (GRI Standards), Sustainability Accounting Standards Board (SASB) Telecommunication Services Sustainability Accounting Standard Codes and, Recommendations of the Task Force on Climate-related Financial Disclosures June 2017 (TCFD). Our assurance is limited to indicators as specified in the table below:

Global Reporting Initiative (GRI)	• The organization and its reporting practices: 2-1, 2-2, 2-3, 2-4, 2-5 • Activities and workers: 2-6, 2-7, 2-8 • Governance: 2-9, 2-10, 2-11, 2-12, 2-13, 2-14, 2-15, 2-16, 2-17, 2-18, 2-19, 2-20 • Strategy, policies and practices: 2-22, 2-23, 2-24, 2-25, 2-26, 2-27, 2-28 • Stakeholder engagement: 2-29, 2-30 • Disclosure on material topics: 3-1, 3-2, 3-3 • Economic performance: 201-2 • Market presence: 202-2 • Indirect economic impacts: 203-1, 203-2 • Procurement practices: 204-1 • Anti-Corruption: 205-1, 205-2, 205-3 • Energy: 302-1 • Emissions: 305-3 [Other indirect (Scope 3) GHG emissions] • Supplier environmental assessment: 308-1, 308-2 • Employment: 401-1, 401-3 • Diversity and equal opportunity: 405-1, 405-2 • Local communities: 413-1, 413-2 • Supplier assessment for labor practices: 414-1, 414-2 • Customer health and safety: 416-1, 416-2 • Customer privacy: 418-1
Sustainability Accounting Standards Board (SASB)	• Environmental footprint of operations: TC-TL-130a.1 • Data privacy: TC-TL-220a.1, TC-TL-220a.2 • Data security: TC-TL-230a.1, TC-TL-230a.2
Taskforce on Climate-Related Financial Disclosures (TCFD)	• Governance – Board oversight and management role in assessing and managing climate-related risks and opportunities. • Strategy – Climate-related risks and opportunities identified and its impact on the organization along with the climate-related scenario analysis. • Risk management – Organization process of identifying, assessing and managing climate-related risks and the integration of these into the organization’s overall risk management. • Metrics & targets – Metrics includes Scope 3

The scope excludes future events or the achievability of objectives, targets and expectations of Zain Group. EY has not conducted an audit, review or conduct an examination of any of the Zain Group’s financial statements or any other financial information.

Criteria applied by Zain Group

In preparing the Subject Matter, Zain Group applied the Global Reporting Initiative Sustainability Reporting Standards (GRI Standards), the Sustainability Accounting Standards Board (SASB) Telecommunication Services Sustainability Accounting Standard and, Recommendations of the Task Force on Climate-related Financial Disclosures June 2017 (TCFD) (Collectively the “Criteria”)

Zain Group’s responsibilities

Zain Group’s management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

EY’s responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the *International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* (‘ISAE 3000 (Revised)’) and the terms of reference for this engagement as agreed with Zain Group on 26th August 2024. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.



Our independence and quality management

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management’s internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the subject matter and related information, and applying analytical and other appropriate procedures.

Our procedures included:

- a. Conducted interviews with personnel in the Group Corporate Sustainability Department, Networks team, Procurement team, Human Resource team and Legal and Risk Management team to understand the business and reporting process;
- b. Conducted interviews with key personnel to understand the process for collecting, collating and reporting the Subject Matter during the reporting period;
- c. Checked documents and internal communications received by the Group Corporate Sustainability Department to validate the accuracy of information reported;
- d. Checked that the calculation criteria have been correctly applied in accordance with the methodologies outlined in the Criteria;
- e. Undertook analytical review procedures over the Subject Matter and made inquiries of relevant personnel;
- f. Tested, on a sample basis, underlying source information to check the accuracy of the data;
- g. Tested the disclosure and presentation of the subject Matter within the report against the criteria.

We also performed such other procedures as we considered necessary in the circumstances.

Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that need to be made to the subject matter as of 31 December 2024 and for the period 1 January to 31 December 2024, in order for it to be in accordance with the Criteria.

For Ernst & Young (Al Aiban, Al Osaimi & Partners)

Signed by Bader ALAbduljader

20 March 2025

Kuwait



Independent practitioner’s assurance report on Greenhouse Gas (GHG Scope 1 and Scope 2) Statement

To the Board of Directors and Management of Mobile Telecommunications Company K.S.C.P.

Scope

We have undertaken a reasonable assurance engagement of the accompanying GHG statement of Mobile Telecommunications Company K.S.C.P. (“Zain Group”) as of 20th March 2025 for the year ended 31 December 2024, comprising the Emissions Inventory Scope 1 and Scope 2, (the “Subject Matter”), contained in Zain Group’s 2024 Sustainability Report (the “Report”). Our assurance is limited to indicators as specified in the table below:

Global Reporting Initiative (GRI)	- Emissions: 305-1(Scope 1) - Emissions: 305-2(Scope 2)
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Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express an opinion on this information.

Criteria applied by Zain Group

In preparing the Subject Matter, Zain Group applied the Global Reporting Initiative Sustainability Reporting Standards (GRI 305-1 and GRI 305-2) and the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard (the “Criteria”)

Zain Group’s responsibilities

Zain Group’s management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the GHG statement such that it is free from material misstatement whether due to fraud or error.

EY’s responsibilities

Our responsibility is to express an opinion on the presentation of the Subject Matter based on the

evidence we have obtained.

We conducted our engagement in accordance with the [International Standard for Assurance Engagements ISAE 3410 Assurance engagements on Greenhouse Gas Statements (‘ISAE 3410’)], and the terms of reference for this engagement as agreed with Zain Group on 26th August 2024. Those standards require that we plan and perform our engagement to obtain reasonable assurance about whether, in all material respects, the Subject Matter is presented in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence we have obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our independence and quality management

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed

A reasonable assurance engagement in accordance with ISAE 3410 involves performing procedures to obtain evidence about the quantification of emissions

and related information in the GHG statement. A reasonable assurance engagement also includes:

- Considering internal controls relevant to Zain Group’s preparation of the GHG statement.
- Assessing the suitability in the circumstances of Zain Group’s use of the Criteria;
- Evaluating the appropriateness of quantification methods and reporting policies used, and the reasonableness of estimates made by Zain Group and
- Evaluating the overall presentation of the GHG statement.

We also performed such other procedures as we considered necessary in the circumstances.

The Green House Gas quantification process is subject to scientific uncertainty, which arises because of incomplete scientific knowledge about the measurement of GHGs. Additionally, GHG procedures are subject to estimation (or measurement) uncertainty resulting from the measurement and calculation processes used to quantify emissions within the bounds of existing scientific knowledge.

Our procedures included:

- a. Conducted interviews with personnel in the Group Corporate Sustainability Department, and the Networks team, to understand the business and reporting process;
- b. Conducted interviews with key personnel to understand the process for collecting, collating and reporting the Subject Matter during the reporting period;
- c. Checked documents and internal communications received by the Group Corporate Sustainability Department to validate the accuracy of information reported;
- d. Checked that the calculation criteria have been correctly applied in accordance with the methodologies outlined in the Criteria;
- e. Undertook analytical review procedures over the Subject Matter and made inquiries of relevant

personnel;

- f. Tested underlying source information to check the accuracy of the data;
- g. Tested the disclosure and presentation of the subject Matter within the report against the criteria.

Opinion

In our opinion, the Emissions Inventory Scope 1 and Scope 2 as of 31 December 2024, and for the period 1 January to 31 December 2024, is presented, in all material respects, in accordance with GRI 305-1 and GRI 305-2.

For Ernst & Young (Al Aiban, Al Osaimi & Partners)

Signed by Bader AlAbduljader

20 March 2025

Kuwait



Contact list

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