



Corporate Sustainability Policy

Version 2.0

Aug 2026

This Policy has been approved by the Zain Group Board of Directors on 10 of August 2026.

Responsibility for Implementing the Policy

Zain Group Corporate Sustainability is responsible for implementing this Policy, monitoring its application across the Group, and recommending updates for approval.

Related Documents

- [Zain Group's Code of Conduct](#)
- [Zain Group's Human Rights Policy Statement](#)
- [Zain Group's Supplier Code of Conduct](#)
- [Zain Group's Personal Data Protection and Privacy Policy](#)
- [Zain Group's Responsible Marketing & Communications Standard Policy Statement](#)
- [Zain Group's Climate Change Policy Statement](#)
- Zain's Environmental and Social Management Plan (ESMP) (Internal)
- [Zain Group's Climate Transition Plan](#)
- [Zain Group's Environmental Standard](#)
- [Zain Group's Waste Management Policy](#)
- [Zain Group Water Management Policy Statement](#)
- Zain Group's Donations and Sponsorships Policy and Approval Matrix (internal)

1. Objective

The objective of this Policy is to establish a guiding framework for Zain to integrate sustainability and ethical principles into every facet of its operations, business practices, and value chain. Zain strives to create value for the business, society, and the environment, while maintaining economic viability and upholding the highest standards of responsibility, transparency, and accountability. By embedding ethics and sustainability into decision-making, Zain aims to achieve the strategic objectives set out in the Zain Group Corporate Sustainability Strategy 2025–2030 in alignment with Zain’s brand values of Heart, Radiance and Belonging and the company’s organizational purpose of “better lives, lasting connections”.

2. Scope and Applicability

This Policy applies to Zain Group and all its operating companies, subsidiaries and companies under management control, and to all directors, officers, and employees of these entities. Zain also expects its suppliers, contractors, outsourced personnel, and business partners to act consistently with the principles of this Policy, as reflected in Zain Group’s Code of Conduct and Human Rights Policy Statement. Where Zain holds non-controlling interests, including joint ventures and venture investments, the company uses its influence to encourage the adoption of equivalent standards.

3. Introduction

Zain Group recognizes the importance of sustainable development and its role in fostering a resilient and inclusive future for all. Zain leverages its resources and influence to embed sustainability throughout its business operations and value chain, acknowledging that the company’s long-term success is linked to the prosperity of the societies in which it operates and to continuously addressing stakeholder needs.

Zain’s approach is grounded in integrated thinking principles of creating and sustaining multiple forms of value, rather than financial returns alone. Our strategy encompasses social, environmental, economic, and human rights dimensions. This means prioritizing the well-being of our stakeholders while minimizing our negative impacts through sustainable practices and fostering resilience in our business model, acknowledging that value creation involves trade-offs that can be positive, negative, or neutral and depend on six capitals, namely financial, natural, social, human manufactured and intellectual. By integrating these elements, the company ensures that its growth benefits all stakeholders.

By aligning our sustainability efforts with our strategic objectives, we aim to enhance our competitive advantage, foster innovation, and drive growth across three time horizons:

- **Short-term impact (1–3 years):** delivers immediate actions and measurable outcomes that build momentum and address current sustainability challenges.
- **Medium-term impact (3–5 years):** targets emerging sustainability risks and opportunities, driving resilience, adaptability, and steady progress toward strategic goals.
- **Long-term impact (5+ years):** focuses on strategic investments to address systemic challenges, create lasting value, and secure a sustainable future.

4. Alignment with Global Standards and Frameworks

Zain's corporate sustainability commitments are informed by, and aligned with, leading international standards and disclosure frameworks, including:

- The Ten Principles of the United Nations Global Compact (UNGC), of which Zain is a member;
- The UN Convention on the Rights of Persons with Disabilities;
- The UN Convention on the Rights of the Child;
- The Guidelines of the Organization for Cooperation and Economic Development for Multinational Companies;
- The United Nations Sustainable Development Goals (SDGs);
- The United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises;
- The Science Based Targets initiative (SBTi), to which Zain has committed its emissions reduction targets to achieve Net-Zero by 2050;
- Global sustainability reporting and disclosure standards, including the Global Reporting Initiative Standards (GRI), Sustainability Accounting Standards Board Standards (SASB), Task Force on Climate-related Financial Disclosures (TCFD), and the ISSB's IFRS S1 and S2; GSMA ESG Metrics for Mobile , and CDP;
- Industry frameworks, principles, and reporting indices and agencies;
- The UNESCO Recommendation on the Ethics of Artificial Intelligence, guiding Zain's responsible adoption of AI.

5. Our Commitments

Zain has a comprehensive approach to corporate sustainability, structured around the three pillars of the Corporate Sustainability Strategy 2025–2030: Climate Action, People & Society, and Operating Responsibly.

5.1 Climate Action

- Align Zain's activities toward achieving the company's Net-Zero target, in line with its commitment to the Science Based Targets initiative and its published [Climate Transition Plan](#);
- Build climate resilience across networks, data centers, and operations to maintain reliable connectivity amid rising climate-related risks;
- Ensure implementation of Zain's Environmental and Social Management Plan (ESMP) to minimize the environmental, social, and economic impacts of our infrastructure expansion and operations, with mitigation embedded into design and construction practices and performance monitored across the Group and operating companies, including contractors under Zain's operational control;
- Advance waste management principles inline with Zain's SBTi approved target of zero waste by 2030 through a circular economy by extending asset lifecycles, promoting reuse, refurbishment, and recycling, and reducing non-recycled waste across operations in accordance with the [Waste Management Policy Statement](#);
- Minimize our environmental and nature footprint by promoting biodiversity conservation and embedding responsible environmental practices across our operations and value chain in line with [Zain's Environmental Standard](#);
- Monitor and manage water and energy consumption to ensure efficient use in line with [Zain's Water Management Policy Statement](#);
- Work with suppliers to decarbonize the value chain, embedding climate and environmental practices into procurement decisions as per the [Climate Transition Plan](#).

5.2 People & Society

- Promote fair labor practices and respect human and children's rights throughout our operations and supply chain, guided by [Zain Group's Human Rights Policy Statement](#) and [Supplier Code of Conduct](#);
- Foster an inclusive, diverse, and equitable workplace where every employee is treated with dignity, fairness, and respect, in accordance with Zain Group's Inclusion, Diversity and Equity policies and procedures;
- Implement initiatives to bridge the digital divide, ensuring equitable access to technology and digital skills across communities, with a particular focus on marginalized and underserved populations such as persons with disabilities, the elderly, children, women, rural populations and economically disadvantaged groups;

- Ensure inclusive products and services for persons with disabilities, the elderly, and other marginalized and vulnerable segments;
- Support the growth of an inclusive digital economy, including through financial technology services that expand financial inclusion for unbanked and underserved populations;
- Invest in upskilling and reskilling programs that prepare employees, youth, and communities for the future of work, including skills in AI, data, cybersecurity, and green technologies. All initiatives must align with the Group Upskilling & Reskilling Framework, including its program classifications, minimum measurement standards, governance requirements, and reporting expectations.
- Build resilience for children and youth within our operating communities
- Encourage employee volunteering in support of community development

5.3 Operating Responsibly

- Develop and use artificial intelligence ethically, transparently, and responsibly, assessing and mitigating AI-related risks including: bias, misinformation, misuse, privacy, and environmental intensity and promoting AI literacy among employees, suppliers, and communities;
- Advocate for children's rights and ensure online safety for children across Zain Group's digital platforms and services, including measures to combat technology-facilitated child sexual exploitation and abuse;
- Safeguard digital rights, including efforts to counter misinformation and disinformation in collaboration with governments and relevant agencies;
- Protect personal data and privacy in line with [Zain Group's Personal Data Protection and Privacy Policy](#), and provide data privacy training and awareness programs, including programs tailored for marginalized communities;
- Establish a responsible supply chain aligned with Zain's standards, policies, and practices, including supplier due diligence, training, and audits under Zain's Supplier Screening Process available in the Supplier Code of Conduct;
- Protect the health, safety, and well-being of employees and workers across our operations and supply chain, monitoring workplace incidents and driving continuous improvement;
- Embed environmental, social, and governance considerations into Zain's venture and investment activities.

6. Governance

Effective governance underpins the delivery of this Policy and of Zain's corporate sustainability agenda:

- **Board of Directors:** the Zain Group Board of Directors approves this Policy and provides oversight of the company's corporate sustainability strategy, performance, and material sustainability-related risks and opportunities.
- **Executive management:** Group executive leadership is accountable for embedding sustainability into business strategy, planning, and resource allocation, and reviews progress against strategic objectives, KPIs, and targets.
- **Corporate Sustainability function:** the Group Corporate Sustainability team is responsible for the day-to-day implementation of this Policy, coordinating with functions across the Group and with operating companies, and for consolidating performance data and reporting.
- **Operating companies:** each operating company is responsible for implementing this Policy and the Group's sustainability frameworks within its market, adapting programs to local contexts while remaining consistent with Group standards.
- **Policy review:** this Policy is reviewed at least every two years, or earlier where material changes in strategy, regulation, or global standards require it. Material amendments are submitted to the Board of Directors for approval.

7. Materiality

Zain conducts periodic materiality assessments to identify the sustainability topics that matter most to the business and its stakeholders. These assessments follow a double materiality approach, considering both the impact of Zain's activities on society and the environment, and the influence of sustainability-related risks and opportunities on enterprise value. The outcomes inform Zain's strategy, target-setting, and disclosures, and are refreshed in line with evolving global standards and stakeholder expectations.

8. Corporate Sustainability Performance Processes

Zain Group prioritizes proactive engagement with its diverse stakeholders, gathering insights through channels such as social media, meetings, and the company's digital platforms. Rigorous monitoring, tracking, and reporting frameworks, supported by clear performance indicators and benchmarking against industry standards, to enable Zain to uphold accountability and demonstrate progress toward its sustainability objectives.

8.1 Stakeholder Engagement

Zain is committed to actively engaging with all its stakeholders, including customers, shareholders and investors, employees, the public and community institutions, business partners, and government and regulators, in an open and transparent manner. Stakeholders are selected based on their relevance to our business activities and value chain. Zain assesses the nature of its relationships with each stakeholder group to determine the most appropriate channels for gathering insights and integrating them into decision-making processes. Stakeholder engagement occurs through multiple communication channels, including social media, meetings, our website, press releases, and the Zain app.

8.2 Partnerships and Collaborations

Zain recognizes that the scale and complexity of today's sustainability challenges cannot be addressed by any single organization, thus Zain pursues strategic partnerships and multistakeholder collaboration with governments, regulators, international organizations, civil society, academia, and private sector entities to amplify the impact and reach of our sustainability objectives. Partnerships are selected based on their alignment with Zain's corporate sustainability strategy, their potential to create shared value for our stakeholders and communities, and the partner's commitment to ethical standards consistent with Zain's Code of Conduct. Zain regularly assesses its partnerships to ensure continued alignment with the Group's strategic objectives and values.

8.3 Initiative Evaluation

As part of the initial phase of planning an initiative, evaluation of the sustainability initiatives, programs, and campaigns is based on their alignment with Zain's strategic objectives, their impact on stakeholders, their contribution to overall sustainability goals, and their ability to create long-term value. This includes regular reviews and assessments to ensure continuous improvement and relevance. By integrating value creation into the evaluation process, the company is able to focus on generating positive social, environmental, economic, and human rights outcomes that benefit all stakeholders, ensuring that initiatives address immediate challenges while contributing to sustained growth and resilience for Zain and the communities we serve.

8.4 Monitoring, Tracking, and Reporting

Zain commits to monitoring, tracking, and reporting on its sustainability performance through established targets and key performance indicators (KPIs). This involves regular data collection, analysis, and reporting to provide transparency and accountability to our stakeholders. Findings and progress including achievements, challenges, and future plans are

made publicly available through Zain's channels, including the company website and the annual Sustainability Report, prepared with reference to global reporting standards and subject to independent assurance and verification where applicable.

8.5 Benchmarking

Zain benchmarks its sustainability performance against industry peers, ESG ratings and indices, and best practices on a periodic basis to identify areas for improvement and to set ambitious yet achievable targets. This helps stay competitive and continuously advance the company's sustainability agenda.

8.6 Grievances and Remediation

In the event of any breach of this Policy or any adverse impact related to it, Zain is committed to promptly identifying the issue, assessing its root cause, and implementing corrective actions to prevent recurrence. Concerns may be reported confidentially to Group.Sustainability@zain.com or through the reporting channels set out in [Zain Group's Code of Conduct](#). All reports are acknowledged, assessed, and investigated in a timely manner, and appropriate remediation is implemented where adverse impacts are confirmed. Zain prohibits retaliation of any kind against anyone who raises a concern in good faith. Grievances related to human rights are handled in accordance with the grievance mechanism set out in [Zain Group's Human Rights Policy Statement](#).

8.7 Compliance

Zain commits to adhering to applicable national and international laws, regulations, and standards, ensuring that business practices meet legal requirements and industry best practices. This includes environmental regulations, labor laws, data protection legislation, sustainability disclosure requirements, and other relevant mandates in the markets where the company operates.

9. Donations and Sponsorships

All sponsorships and donations undertaken by Zain are governed by the Donations and Sponsorships Policy and Approval Matrix, which sets out the criteria for the evaluation, approval, and monitoring of donations and sponsorships and ensures their compliance with laws, regulations and alignment to Zain's corporate sustainability strategy, brand values, and ethical standards.

10. Conclusion

Zain Group's Corporate Sustainability Policy is a foundational commitment to integrating ethical principles and sustainable practices throughout our operations and value chain. Its objective is clear: to minimize environmental impact, ensure positive social outcomes, and maintain economic viability with the highest standards of responsibility, transparency, and accountability.

By prioritizing climate action, social equity, and governance transparency, Zain aims to minimize its environmental footprint, enhance community resilience, and foster innovation and economic development. The company's dedication to these principles ensures the long-term value creation for the business and positively impacts societies and environments in which it operates. Through continuous improvement, stakeholder engagement, and rigorous alignment with global standards, Zain strives to lead by example in sustainable development, creating lasting value for current and future generations.