



Zain Group Human Rights Policy Statement

This policy has been approved by the Zain Group Board of Directors on 17 February 2026

Introduction

Since inception, Zain has been deeply committed to the basic principles of human rights, respect for the rule of law and the wellbeing of society. We conduct our business in a fair, transparent, and equitable manner and proactively engage with our various stakeholders. Our Board of Directors recognize that Zain Group has the responsibility to acknowledge respect for human rights and contribute towards positive systemic change in our communities.

Human rights and its related applications are of great importance to a variety of stakeholders including our Board of Directors, shareholders, investors, employees, business partners, suppliers, customers, and the public. We recognize that as part of our social contract, Zain should always strive to be inclusive in its approach to business and play a leading role for the betterment of society.

Our Human Rights Policy Statement illustrates the principles embedded into our policy which set out the minimum obligations that every person working for the company or engaged with Zain must adhere to.

Commitment

At Zain we commit to respecting human rights as defined in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the ILO Declaration on Fundamental Principles and the Rights at work.

The policy is also guided by the United Nations Guiding Principles for Business and Human Rights, 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, and it is in alignment with the principles of the United Nations Global Compact and the Global Network Initiative's principles on Freedom of Expression and Privacy – GNI Principles.

This policy applies to all Zain operating companies and those entities under Zain Group Management control. The policy is also applicable to all our suppliers and business partners as well. Our suppliers are expected to adhere to the Zain Group Supplier Code of Conduct and the Zain Group Human Rights Policy.

Zain is committed to monitor the implementation of this policy through its internal processes overseen by Group Sustainability, Group Risk Management, Group Corporate Governance and Group Legal whose mandate is to report on a transparent basis the progress made on human rights issues to the Board of Directors. Human rights issues are communicated in Zain's Annual Corporate Sustainability Report.

Objective and Scope

Through this policy Zain confirms its commitment to respect and actively encourage upholding human rights principles at the Group, its operating companies, and its supply chain.

We aim to establish the guidelines required to make certain that our operating companies are equally committed as these guidelines describe the governance framework as a minimum requirement and is applicable to all the operating entities that constitute part of the Zain Group.

Declaration

Zain firmly believes that the right to access to communications, right to privacy & freedom of expression, child rights & child online safety, child labor, force labor, modern slavery, human trafficking and use of conflict minerals are fundamental human rights, and we are taking steps to promote human rights through the access to our products and services.

Approach and Key Impact Areas



Approach and Key Impact Areas

Our approach to human rights starts with understanding how our activities, including our products and services, as well as the activities of our business partners may impact, positively or negatively our rightsholders. These include employees, contractors and subcontractors, customers, supply chain workforce, and the broader community.

We strive to ensure that the rights of these rightsholders are respected and promoted through our activities and those of our business partners. We work to meet our commitment through the activities outlined below:

Privacy and Freedom of Expression:

Zain takes great steps in ensuring that the proper processing of personal data is in place with the objective to respect the fundamental rights and freedoms of individuals including the right to the protection of personal data. The company tries to minimize the impact that might result from possible government restrictions which might be consistent with both national and international law standards. All requests must be according to regulatory frameworks and the rule of law.

Products and Services:

The company ensures that products and services are developed through a framework that assesses the impact of new technologies and the overall impact on the various stakeholders

Child Online Safety & Child Rights:

Zain is committed to actively promote and advocate for a safer internet environment for children and youth across its footprint. The company plays an active role in respecting the rights of children, prohibits the use of child labor in any of its operations and its supply chain and will take necessary steps against those individuals or partners that do not abide by this requirement.

Zain is committed to developing products and services that provide children with meaningful content to enrich their learning and development.

Discrimination:

Zain takes great measures to ensure that its business practices are non-discriminatory and engagement with all its stakeholders including but not limited; customers, partners, agents, and the general public, is without bias related to nationality, race, gender, ethnicity, religion, age and disability.

Fair and Safe Work Environment:

Zain believes that all its employees should be treated with dignity, respect and fairness and should not be subjected to harassment, discrimination, forced labor, or inhumane treatment. The company is continuously working on providing a safe and inclusive work environment for our employees in line with international labor standards across our geographical footprint. Zain also promotes the same values across its value chain and has oversight mechanisms and expectations from the various business partners to meet the same standards in their own operations.

Diversity and Inclusion:

Zain strongly believes in being a diverse and inclusive organization that fosters equal opportunities without prejudices linked to nationality, race, gender, ethnicity, religion, age, and disability. Zain is committed to enhancing gender parity in its workforce and empowering women across its value chain.

Partnerships:

Zain believes in doing business with partners that share our values and commitments to respect human rights. While Zain strives to work with partners that share our human rights commitments, we acknowledge that sometimes this might not be the case. To mitigate risks of human rights violations further down our supply chain, we will continue to strengthen

our ongoing partnership due diligence and review the process, including a review of potential human rights considerations as part of that due diligence, and use our leverage when partner related risks are identified.

Conflict Minerals:

Zain understands the risks associated with conflict minerals – which refers to the use of raw materials – tin, tantalum, tungsten, and gold also called 3TG metals as well as the use of Cobalt- which is widely used in the electronic industry.

The company request all its suppliers to ensure conflict minerals are not used in equipment sold to Zain nor utilized in any manner through the company's supply chain.

Disclosure on the use of conflict minerals is mandatory and it is also part of the Supplier Self-Assessment program.

Slavery and Human Trafficking:

Zain does not tolerate any form of forced, compulsory, bonded labor, human trafficking, child labor or any kind of slavery or oppression within its operating companies and its supply chain. We are steadfast in our obligation to take necessary steps to ensure that everyone adheres to our principles and values and overall respect for human rights.

The image features a close-up of two hands shaking, symbolizing agreement or partnership. The entire scene is overlaid with a semi-transparent teal color. In the bottom right corner, there are decorative geometric elements: a blue-outlined octagon and several green, stylized leaf or petal shapes. The text 'Compliance & Governance and Remediation' is centered in white, bold, sans-serif font.

Compliance & Governance and Remediation

Compliance

Employees, suppliers, business partners and contractors are expected to:

- (1) comply with this policy and all applicable Zain Policies
- (2) to speak up promptly about any conduct or circumstances they believe may constitute a violation of this policy or any other policy.

Governance and Remediation

Human rights at Zain is part of the wider strategy and it is implemented through several policies and procedures.

We report on our progress against our targets in our annual Corporate Sustainability Report. Ultimate oversight of human rights falls under Zain Group Vice Chairman and Group CEO. Operational oversight of human rights is managed by Group Chief Sustainability Officer, Group Head of Legal, Group Chief Communications Officer in charge of Corporate Governance, Head of Corporate Compliance in charge of Corporate Compliance and Group Chief Human Resources Officer.

In line with the expectations articulated in the UN Guiding Principles, Zain provides several grievance channels for employees and other stakeholders to report concerns on human rights and receive remedy including through www.zain.com, Zain official address: PO Box 22244, Safat 13083, Kuwait or info@zain.com.

We advise and encourage all concerned stakeholders to not hesitate to raise a concern. Any Zain's employee who suspects violations of this Policy is expected to speak up and raise the issue to their line manager, to Human Resources, to the Compliance Office, or to use the Zain's Whistleblower policy.

All Zain's employees, suppliers, business partners and contractors can raise questions and/or concerns and to report regarding potential and actual adverse Human Rights impacts. At Zain, we do not accept any form of retaliation against someone who speaks up, expressing concerns or opinions. In addition, the local laws and regulations ensure protection of the whistleblower from discriminatory and punitive actions as a result of reporting in good faith acts of corruption, misconduct, or suspicious activities.

We are committed to investigating any concerns, and if we discover any adverse Human Rights impacts, we will act appropriately without delay.

The purpose of Zain's Grievance mechanisms is to:

- provide a way to reduce the risk entailed in projects,
- provide an effective means of communications between involved parties to express and address concerns
- provide solutions to such concerns
- foster a mutually beneficial relationship.

A consistent structure serves for a well-functioning grievance mechanism. Our mechanism at Zain is transparent, fair, and effective as per the local laws and regulations which conform with international standards. Zain ensures to develop trust as an essential part of wider community relations through its procedures and operations. Our board and management work collectively to identify rising issues and trends and facilitate remedial action in a proactive approach.