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Addressing Key Challenges to Human Rights



Addressing Key Challenges to Human Rights

Zain is deeply committed to the basic principles of human rights, respect for related laws, and regulations, and the overall wellbeing of communities it serves and beyond. As part of its social contract, the company strives to be inclusive in its approach to business and play a leading role for the betterment of society.

The company's strategic approach towards human rights is framed by the following:

Governance and Policy

Our Approach

Identification of Salient Human Rights through Engagement

Reporting and Impact



Zain continues its alignment with the UNGP on Business and Human Rights Reporting

The company aligns its human rights reporting methods to the United Nations Guiding Principles on Business and Human Rights Reporting Framework. Zain's commitment to the principles showcases its strong stance in upholding the highest standards across its operating communities.

In 2022, Zain joined the United Nations (UN) Global Compact initiative, a voluntary leadership platform for the development, implementation, and disclosure of responsible business practices. The UN Global Compact is a call to companies everywhere to align their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment, and anti-corruption, to take action in support of the UN's Sustainable Development Goals (SDGs).



Governance and Policy

Zain's Human Rights Policy Statement aims to define the governance and requirements mandated to all stakeholders that engage with Zain.

The company defines human rights as per the definition of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the ILO Declaration on Fundamental Principles and Rights. The policy is 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.

The policy is published on Zain Group's website, here:

[English](#) | [Arabic](#)

Our Approach

Zain's scope for human rights extends to all its operations (Bahrain, Iraq, Jordan, Kuwait, Saudi Arabia, Sudan, and South Sudan). Based on its continuous engagement with stakeholders, assessment of Zain's operating context and communities, industry landscape, and the Sustainable Development Goals (SDGs), the following human rights topics have been identified:

Salient Human Rights Topics

Value Chain and Impact

Labor Rights, Treatment and Safety



Supply Chain



Public Safety



Supply Chain and Community



Customers' Right to Privacy



Community and General Public



Child Online Safety



Community and Vulnerable Segments



Identification of salient human rights topics through engagement

Zain identified the most relevant human rights issues primarily through high-level interactions within the company, namely between the Vice-Chairman and Group CEO, Chief Sustainability Officer, and other senior executives, the Board of Directors, Chief Risk Officer, Chief Human Resources (HR) Officer, Head of Legal/ Legal Counsel, and Chief Communications Officer. The company also takes into consideration insights from leading industry associations, data analytics platforms, industry analysts, and ESG indices.

Zain also leverages its social media channels to engage with the public on topics that include promoting the importance of child hotlines, protecting data privacy, and inclusion. Zain continued to engage with shareholders and key investors; communicate with local communities regarding site selection; and abided by all laws and regulations regarding upholding people's rights.

To ensure Zain's policies to protect human rights continue to be effective, the company frequently engages with employees, suppliers, the public and other stakeholders who may be potentially impacted by such policies. Employees, for example, possess several internal channels through which to communicate labor grievances. In cases where people are negatively impacted by the company's activities, effective remedies are stipulated within Zain's HR Policy Statement, its Supplier Code of Conduct and its Environmental and Social Management Plan (ESMP) Guidelines. Each document clarifies channels for impacted people to communicate their grievances to the company



Impact and Reporting

The policies related to addressing human rights issues are shared and readily available to all relevant stakeholders and accessible to all employees through the Zain Group website and dedicated Zain application. Such specific policies are articulated within the Human Rights Policy Statement, Human Resources Policy, the Supplier Code of Conduct, the Corporate Sustainability (CS) Policy, Climate Change Policy, and the Environmental and Social Management Plan Guidelines. With regards to customers, Zain's policy on protecting its customers' data privacy is articulated in the GSMA Mobile Privacy Principles and reflected in the Data Privacy Policy. An updated policy was undertaken to incorporate international best practices and embed laws and regulations developed across Zain's markets. The company's position on the non-disclosure of customer information and the protection of the confidentiality and privacy of all personal information is publicly available on the website: (<http://www.zain.com/en/privacy-policy/>).

In addition, Zain ensures that its local and international suppliers also share their commitment to responsible business practices, which include human rights. Such human rights standards are upheld by Zain's suppliers and partners through compulsory compliance with Zain's Supplier Code of Conduct and a screening process that takes place prior to onboarding new suppliers.

In 2022, Zain expanded the number of international and local suppliers that adhere to its human rights policies. Through this engagement, suppliers must also commit to the human rights policy statement before registering on Zain's supplier portal. The company is currently going through a process to ensure existing suppliers are all signatories to the Human Rights Policy Statement that was launched in 2020.

Furthermore, in matters regarding geographical expansion or entry into new revenue streams through acquisitions of licenses or existing businesses, Zain pays attention to human rights impact assessments, including gender equality, inclusiveness and fair and equal opportunity labor practices such as child labor, compulsory labor, etc. This report covers all of Zain's most pertinent human rights issues that took place during the course of the year. During this period, there were no human rights abuses committed under Zain's scope.

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

Zain's Human Resources-related policies are communicated with employees through internal announcements and the Zain employee application. The company also promotes open communication channels across the Group, which enables employees to voice their concerns, feedback, and views on the company's policies and procedures. As such, the Human Rights and Human Resources Policies remain fluid documents that are responsive to employee priorities and are adjusted accordingly.

IMPACT ON POLICIES

Zain maintains multiple channels for employees to report any violations of their labor rights or mistreatment and ensures any updates on the policies and procedures are communicated through Zain's internal channels. The company also monitors any incidents related to discrimination and assesses the corrective action to be taken to address any cases across its operations.

Public Safety



STAKEHOLDER ENGAGEMENT

Zain ensures that its activities, such as the establishment of base stations, are in accordance with the ESMP guidelines and are carried out in compliance with relevant regulatory bodies. In 2022, the company started the revision process for its ESMP guidelines to ensure they capture stakeholders' concerns and Zain aims to finalize the updated version in the first quarter of 2023.

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.

Customers' Rights to Privacy



STAKEHOLDER ENGAGEMENT

The protection of Zain customers' personal data is communicated through its annual Sustainability Report in the 'Our Products and Customers' and 'Our Enterprise Risk Management' section, and through the website. Zain continues to place great emphasis on data privacy and information security across all areas of the business to ensure customers are protected. The company is also working with the GSM Association (GSMA) on how it can educate marginalized segments such as the elderly and people with disabilities to remain safe online.

IMPACT ON POLICIES

The company continues to adhere to the GSMA Mobile Privacy Principles and is committed to protecting the personal information of its customers. The company applies stringent measures to avoid data leaks, theft and/or loss. Zain also aims to respond to such issues with the utmost precaution and diligence. Zain complies with laws and regulations related to the protection of customer data privacy and follows developments occurring in this space.

Child Online Safety



STAKEHOLDER ENGAGEMENT

The pandemic resulted in the drastic increase of children online. The company's Human Rights Policy Statement covers and protects children's rights and safety online. Under Zain's Generation Youth pillar, one of the focus areas is child online safety where designated KPIs and targets include:

- Installation of child sexual abuse material (CSAM) blocking mechanisms across all markets
- Launch of cyber bullying awareness campaigns
- Facilitation of features for nation-wide child helplines
- Ongoing stakeholder engagement with schools, government agencies, law enforcement, and child protection organizations

IMPACT ON POLICIES

Zain maintains its adherence to the GSMA's Mobile Alliance Against Child Sexual Abuse Content. More information on Zain's progress in achieving the targets are included in the 'Our Sustainability Agenda' section on [page 113](#).