

CHAPTER

11



Human Rights



The company’s strategy towards Human Rights is framed by the following:

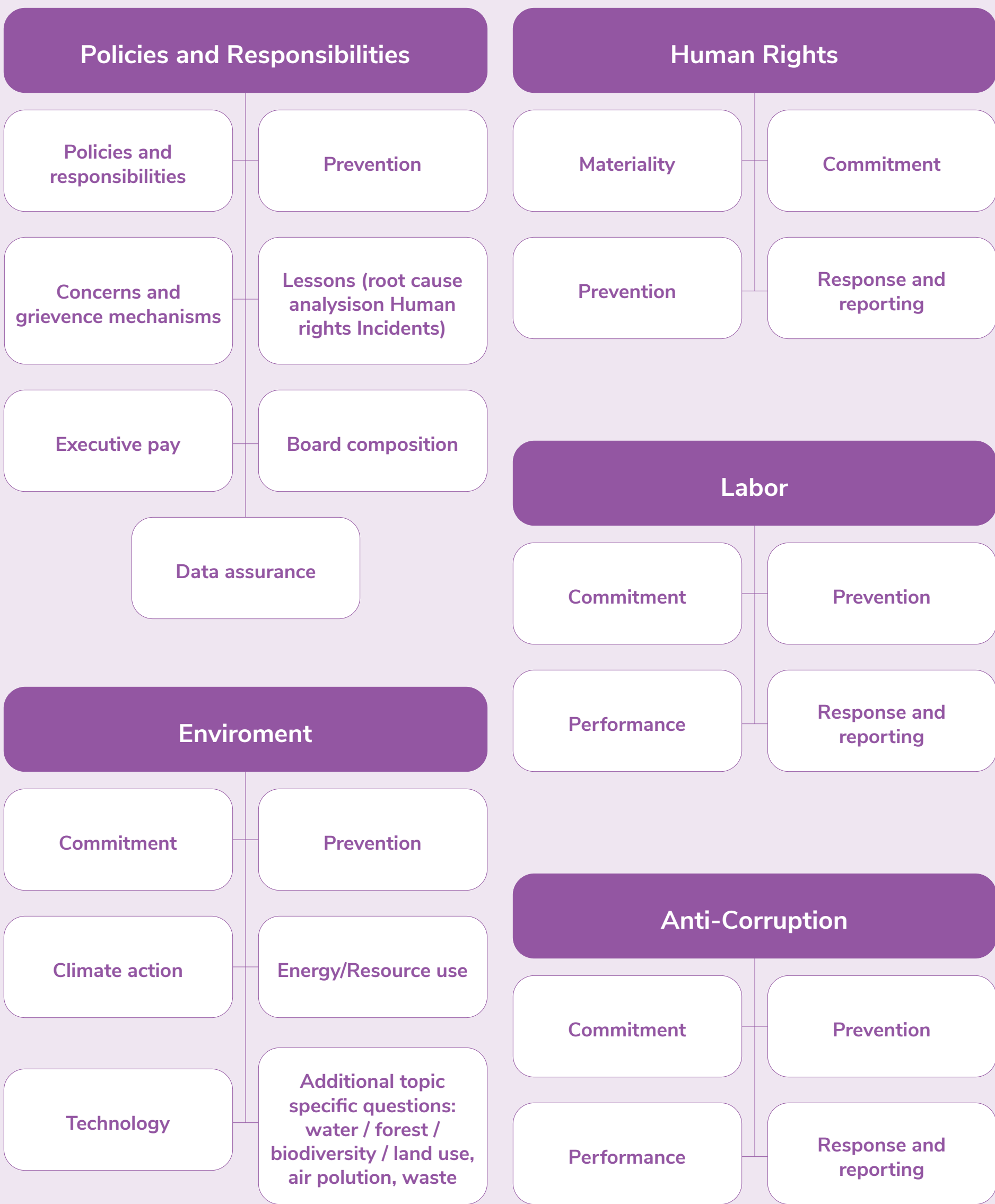
- Governance and policy
- Our approach
- Identification of salient human rights topics through engagement
- Reporting and impact

Zain continues its alignment with the United Nations Guiding Principles (UNGP) on Business and Human Rights Reporting

For its ninth consecutive year, Zain is continuing its alignment with the UNGP on Business and Human Rights. By reporting on the principles, the company provides the transparency and accountability needed to inform its stakeholders on how it addresses human rights risks.

The company’s 2023 Thought Leadership Report titled, “Building Inclusive Societies Through Connectivity” emphasizes the various phases of connectivity over the four decades of Zain’s operations while highlighting how such connectivity is a fundamental human right. The report also includes a section dedicated to Zain’s Human Rights Impact Assessment where it highlights the company’s salient issues related to the topic and how it addresses them.

Last year, Zain became a member of the United Nations (UN) Global Compact initiative, a voluntary leadership platform for the development, implementation, and disclosure of responsible business practices. In 2023, the company finalized its Communication of Progress (CoP) report and publicly submitted it through the UNGC portal. The CoP report covers the following topics:



GOVERNANCE AND POLICY

Zain demonstrates the importance of adhering to human rights through its [Human Rights Policy Statement](#), [Corporate Sustainability \(CS\) Policy](#), [Code of Conduct](#), [Supplier Code of Conduct](#), [Climate Change Policy](#) and [Data Protection and Privacy Policy](#). The policies are in line with universal and local human rights rules and regulations and international standards. They also ensure that human rights requirements are applicable to all stakeholders across the company’s value chain.

The policies are guided by the following standards:

- UNGP 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
- Principles of the United Nations Global Compact
- Global Network Initiative’s Principles on Freedom of Expression and Privacy – GNI Principles.

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

OUR APPROACH

Zain’s scope for human rights extends across operations (Bahrain, Iraq, Jordan, Kuwait, Saudi Arabia, Sudan, and South Sudan), as well as to subsidiaries such as ZainTECH, Zain Omantel International (ZOI), and 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 Sustainable Development Goals (SDGs), the following human rights topics have been identified:



IDENTIFICATION OF SALIENT HUMAN RIGHTS TOPICS THROUGH ENGAGEMENT

This section provides the different components that were taken into account when identifying the salient human rights topics for Zain in addition to any evolutions that happened in 2023.

- In 2023, the company conducted its human rights impact assessment which is disclosed in detail in its 2023 Thought Leadership Report. The company's due diligence identified the most relevant human rights issues, primarily through comprehensive stakeholder engagement. In addition, insights are 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 Purpose and HR Officer, Head of Legal/Legal Counsel, and Chief 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, raising awareness on vulnerable segments that include people with disabilities. The company also looks to address the digital divide, and internet safety. 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 through the company's Environmental and Social Management Plan (ESMP).
- Based on this year's human rights impact assessment, Zain added Digital Inclusion as a salient human rights issue and repositioned Child Online Safety to Children's Rights to ensure the topic takes a holistic approach to addressing the needs of children and safeguarding their rights. By adding Digital Inclusion, the company looked to ensure this encompasses access to connectivity and necessary skills.
- The company not only maintains its policies and ensures they are upheld, but also prioritizes educating its stakeholders that may be impacted, including its employees, suppliers, the public, and other relevant stakeholders. In 2023, Zain launched a supplier training video on human rights on its website where it monitors its viewership, verifies its completion, and solicits feedback from suppliers.
- 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 Conducts, and ESMP. Each document includes details for impacted people to communicate their grievances to the company.

REPORTING AND IMPACT

In addition, Zain ensures that its local and international suppliers also share its commitment to responsible business practices, which include human rights. Standards are expected to be upheld by Zain's suppliers and partners through compulsory compliance with the company's Supplier Code of Conduct, Human Rights Policy Statement, and a screening process that takes place prior to onboarding.

In 2022, Zain expanded the number of international and local suppliers that adhere to its human rights policies and 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 related to 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, children's rights, accessibility for people with disabilities, inclusivity, fair and equal opportunity, and 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 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](#)
- [Life at Zain](#)

The company also has its internal policy that is communicated and available to all employees:

HUMAN RESOURCES POLICY

All documents listed above are revised every three years, however the company may make changes more frequently in alignment to its stakeholders' needs and expectations in addition to aligning to evolving best practices.

IMPACT ON POLICIES

Zain maintains multiple channels for employees to report any alleged violations of their labor rights or mistreatment and ensures any updates on policies and procedures are communicated through Zain's internal channels. The company also monitors any incidents related to discrimination and assesses the corrective action necessary to address any cases across its operations. The company also has open channels for its suppliers to provide or report on any incident through its whistleblowing channel at: whistleblowing@zain.com

PUBLIC SAFETY

STAKEHOLDER ENGAGEMENT

Zain ensures that its activities, including the establishment of base stations, are in accordance with ESMP guidelines and are carried out in compliance with relevant regulatory authorities. In 2023, the company finalized the revision of its ESMP guidelines, approved by the Board of Directors.

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.

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 and Customers' section, and through the website. Zain continues to place great emphasis on data privacy and information security across all areas of the business. In 2023, the company published its updated Data Protection and Privacy Policy to guarantee the company meets the highest standard of data protection and privacy.

IMPACT ON POLICIES

The company's 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.

DIGITAL INCLUSION

STAKEHOLDER ENGAGEMENT

The company ensures it tackles this topic internally and externally. Internally, it has a dedicated Diversity, Equity and Inclusion (DE&I) 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 DEI 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 84](#).

CHILDREN'S RIGHTS

STAKEHOLDER ENGAGEMENT

Zain's Human Rights Policy Statement and Data Protection and Privacy Policy 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 2023, the company participated in the revitalized GSMA Mobile Alliance against Digital Child Sexual Exploitation initiative. The mobile alliance is comprised of international mobile operators within the GSMA committed to working together to take proactive steps to fight technology-facilitated child sexual exploitation. The mobile alliance adopts a multi-stakeholder approach by engaging with key international stakeholders to ensure a well-coordinated response and effort in countering digitally facilitated child sexual exploitation and abuse.

IMPACT ON POLICIES

More information on Zain's progress in achieving the targets in this area are included in the 'Our Sustainability Agenda' section on [page 84](#).

