



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](#)

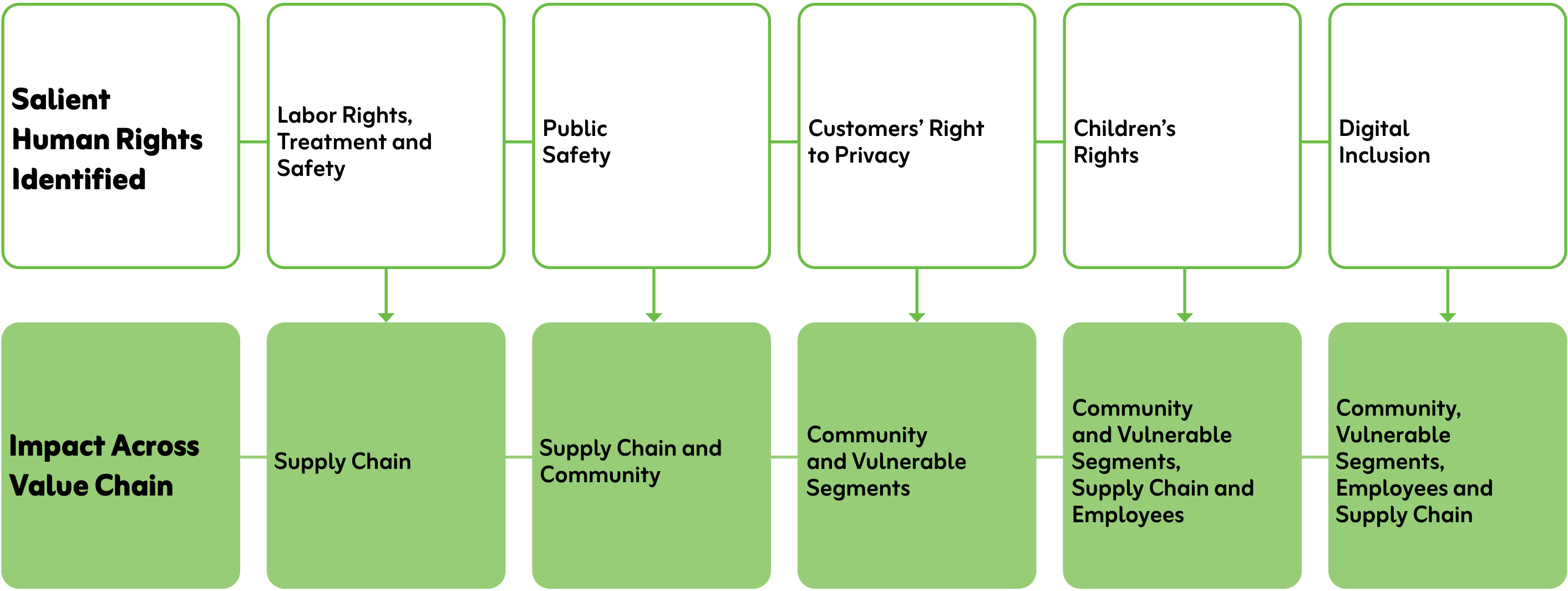
All of the company’s policies are publicly available on its website in [English](#) and [Arabic](#).



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](#).