

Grounded in Purpose, Growing Sustainably

SUSTAINABILITY REPORT 2025

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01 About the Report





Zain's 2025 Sustainability Report offers a comprehensive overview of the company's sustainability activities and performance, highlighting both its actual and potential impact across environmental, social, and governance domains. The report also explores how Zain creates, preserves, or erodes value over the short-, medium-, and long-term across the six capitals, Financial, Manufactured, Natural, Human, Intellectual, and Social, the framework developed by the International Integrated Reporting Council (IIRC) under the integrated thinking approach.

Report Scope and Timeline:

Headquartered in Kuwait, Zain operates in the following markets: Kuwait, Bahrain, Iraq, Jordan, Saudi Arabia, Sudan, and South Sudan, and counts the following key subsidiaries: ZainTECH, TASC Towers and Zain Omantel International (ZOI), all headquartered in the UAE. In Morocco, Zain holds a 15.5% stake through a joint venture, though INWI is not referred to in this report.

In alignment to Zain's annual report/financial statements, the report is reviewed, assessed, and approved by the company's Vice-Chairman and Group CEO; Chief Sustainability Officer; Chief Financial Officer; and other executive management members prior to its publication.

It is published on an annual basis and covers the period from January 1, 2025 to December 31, 2025.

Assurance:

The 2025 Sustainability Report is independently assured by Ernst & Young (Al Aiban, Al Osaimi & Partners) under both Reasonable and Limited Assurance. Last year's reasonable assurance covered Scope 1 and 2 emissions, where this year's scope has been expanded to include Scope 3 emissions. Details on the reasonable assurance indicators can be found on page 142, with the Limited Assurance report presented on page 144.

Alignment of Frameworks:

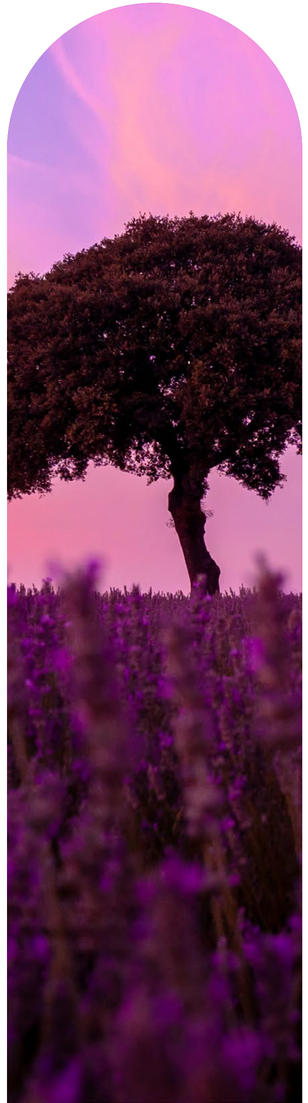
Zain's Sustainability Report is developed in alignment to the following disclosure frameworks:

- AA1000 Accountability Principles (AA1000AP) 2018
- Global Reporting Initiatives (GRI) standards
- Sustainability Accounting Standards Board (SASB) with the application of the Telecommunications Sustainability Accounting Standard
- Task Force on Climate-Related Financial Disclosure (TCFD)
- United Nations Guiding Principles (UNGP) on Business and Human Rights Reporting Framework
- ESG Reporting Guide published by Boursa Kuwait
- GSMA ESG Metrics for Mobile
- United Nations Global Compact (UNGC) principles

Zain 's net zero ambition is in line with the Science-Based Targets initiatives (SBTi), where the company's commitment and targets are validated and approved. In addition, the methodology used to calculate the company's emissions is based on the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard. In addition, Zain aligns its emission factors to the International Energy Agency (IEA) Standards to ensure consistency across all country operations. While the Nationally Determined Contributions (NDCs) in Zain's markets extend to 2050, 2060, or beyond, Zain's alignment with the SBTi Net Zero Framework, which requires achieving net zero by 2050, ensures consistency with all market-level commitments.

This edition of the report includes certain significant information from previous Sustainability Reports that has been reiterated for context. Repetitive or publicly available information has been excluded to enhance the fluidity of the current report and avoid redundancies. Additionally, the report addresses instances where organizational changes have occurred during the reporting period.

This report is also prepared in accordance with the International Integrated Reporting Framework, embedding the principles of integrated thinking and demonstrating how Zain creates, maintains or erodes value across the six Integrated Thinking Capitals. By adopting this framework, Zain provides a holistic view of how financial and non-financial resources interact across the organization and value chain.



The six capitals referenced throughout the report include:

- **Financial Capital:** The funds available to the organization for deployment in its operations and investments.
- **Manufactured Capital:** Physical infrastructure and technological assets that support service delivery and innovation.
- **Intellectual Capital:** Knowledge-based assets such as systems, processes, innovation capabilities, and proprietary expertise.
- **Human Capital:** The competencies, experience, well-being, and development of Zain's employees.
- **Social and Relationship Capital:** Stakeholder relationships, community trust, partnerships, and societal impact.
- **Natural Capital:** The natural resources and environmental ecosystems that Zain depends on and influences.

This report is published on March 30, 2026.

Zain welcomes any comments, feedback, or suggestions regarding the content included in relation to Zain's sustainability performance.

Please reach out to us on:

EMAIL: group.sustainability@zain.com

Please note that our official email has been updated to group.sustainability@zain.com (previously CS@zain.com) for greater clarity on the division and associated communications.

02 Company Overwiew



Operating in eight different countries, Zain serves 50.9 million customers, providing innovative technologies, enterprise solutions, and digital lifestyle communications, which is possible due to a talented workforce exceeding 8,254 employees. Previously known as Mobile Telecommunications Company K.S.C.P, Zain was established by an Amiri decree in 1983. Currently, the company has several shareholders, where Oman Telecommunications Group holds the largest single stake in the Company, with an indirect ownership of 21.9%. This is followed by the Kuwait Investment Authority, which holds a direct stake of 15.9%. The Public Institution for Social Security holds an indirect stake of 6.0%, while Al-Sharq Holding Co. holds an indirect stake of 5.05%.

The table below depicts a detailed breakdown of the equity share of Zain in its operating markets across the Middle East and North Africa:

100%	Zain International B.V. (“ZIBV”)
96.516%	Pella Investment Company (“Pella”)
65.11%	Zain Bahrain B.S.C (“MTCB”)
100%	Sudanese Mobile Telephone (Zain) Company Limited (“Zain Sudan”)
100%	South Sudanese Mobile Telephone Company Limited (“Zain South Sudan”)
76%	Al Khatem Telecoms Company (“Al Khatem”)
76%	Atheer Telecom Iraq Limited (“Atheer”)
37.045%	Mobile Telecommunications Company Saudi Arabia (“SMTC”)
100%	ZainTech Solutions FZ-LLC (“Zain Tech”)
100%	Zain Fintech Holding W.L.L (“Zain Fintech”)
100%	Zain Ventures Holding Company W.L.L (“Zain Venture”)
100%	IHS Netherlands GCC B.V. (“IHS”)

Pella owns 100% of Jordan Mobile Telecommunications Services Co. JSC – “JMTS” and 99.1% of Al Mouakhaa Lil Kadamat Al-Logistya Wal Al-Itisalat (“Mada Jordan”).
Al Khatem owns 100% of Atheer.
Zain Tech owns 100% of BIOS, STS and Adfolks (31 December 2024: 65% of Adfolks).
JMTS, MTCB, Zain Sudan, Zain South Sudan, Atheer and SMTC operate the cellular mobile telecommunications network in Jordan, Bahrain, Sudan, South Sudan, Iraq and the Kingdom of Saudi Arabia (KSA) respectively.
Mada Jordan provides WiMAX services in Jordan.
Zain Tech provides network consultancy and cloud solutions in MENA region.
Zain Venture is engaged in activities of holding companies.
Zain Fintech is engaged in activities of holding companies.
IHS and TASC provide tower infrastructure services.



Zain’s Values:

The company’s values define its culture, contribute to achieving its purpose of “Better Lives, Lasting Connections,” and provide a blueprint for how Zain interacts with the world.

1. Heart:

A company with courage to make the choices that makes this a better world

2. Radiance:

A company that puts inspiration at the center of its powerful leadership

3. Belonging:

A company that breaks down boundaries and brings people together

Facts and Figures (end 2025):

Active Users
50.9M

Consolidated revenues
USD 7.44B

Net income
USD 777M

Contributed to community development
USD 3.04M

Reduction in CO_2 emissions from 2020
11.37%



03 Message from the Board of Directors

The year of 2025 witnessed great value and growth being created across the organization. The Board of Directors continued to focus on organizational excellence anchored in best-in-class governance practices. In the area of Governance, emphasis was placed on corporate compliance through the establishment, in late 2024, of the Group Corporate Compliance Department.

During 2025, the Group Corporate Compliance department set to establish the various check lists related to the Board of Directors' approved policies and began compliance assessment and implementation with Board oversight and related guidance. The focus on compliance indicates the Board's commitment to governance and transparency.

With respect to the company's rating, Zain achieved a major milestone by solidifying its position in several key rating indices. In the Morgan Stanley Capital International (MSCI) rating, the company achieved 'A' level score, while Zain's rating in S&P was significantly improved to maintain the top level in the region. In the FTSE4Good, Zain scored above industry average.

The improved ratings reflect the Board' commitment to ESG practices and efforts given by the Corporate Governance and Corporate Sustainability Departments, which are committed to solidifying Zain's leading position within the ICT sector.

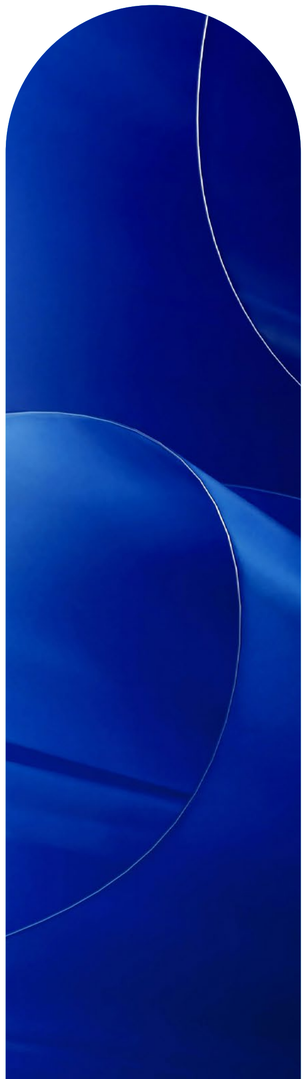
We extend our sincere gratitude to the Amir of the State of Kuwait, Sheikh Meshal Al Ahmed Al Jaber Al Sabah and to the members of Government in the markets in which we operate for their unwavering support for the company's endeavors in driving Meaningful Connectivity that leads to equitable systemic change.

Sincerely,
Zain Group Board of Directors



04 Message from the Vice-Chairman and Group CEO





During 2025, geo-political and economic challenges continued to shape our operating context; though Zain's resilience grounded in innovation with a focus on opportunities, resulted in impressive growth despite the trials at hand. All operations across our footprint reported impressive operating developments, especially Kuwait, KSA, Sudan, and Iraq as did many of the new business verticals established in recent years.

In Kuwait, the country's challenges impacted overall performance; however, the operation focused on the launch of 5G-Advanced services, monetizing data, and supporting small and medium-sized entities (SME) by providing guidance on how to use data properly through the development of a platform analyzing data for the SME sector. B2B revenue saw significant growth through major enterprise wins.

In KSA, the operator witnessed sustained momentum of its operational and expansion strategy, driven by growing demand for its consumer and enterprise solutions powered by its investments in 5G Advanced. It has recently tapped into digital insurance, healthtech and enhanced its all-digital mobile service, Yaqoot, which continues to record strong growth in customers and revenues.

Zain Sudan saw a "relaunch" based on the investments in the restoration of the networks coupled with the unwavering resilience of the Sudanese people. This represented a major turning point, despite Zain Sudan employees being displaced because of the ongoing civil conflict, their strength and commitment propelled to come together and focus on value creation, restoring network coverage, and increasing connectivity of network sites. The operation experienced outstanding growth in B2B, digital services, data revenues, and net income, among other key metrics.

In Iraq, a major transformation was witnessed due to a change in management that triggered a ripple effect within the organization. The adjustment involves a more focused approach to the business, shaped by a cohesive approach guided by a clear direction on how to deliver value. This led to greater clarity on expanding the network and about which products to launch in the market, thus achieving greater returns.

On the Fintech front, value continues to be created, as Zain expands its operations in this area. 2025 was a great year with growth in revenues and the official rebranding of Bookeey to Bede in Kuwait. Bede Bahrain continued to deliver strong results offering microfinance, while Zain Cash Iraq delivered growth in electronic payments, and in Jordan, Zain Cash launched Apple Pay as the first mobile wallet the country. In KSA, Tamam continued its trajectory growth, now contributing a considerable amount of the profit from the Group's operations in the Kingdom.

Another area that experienced growth is Insuretech, which is set to launch across more Zain's operating markets under the brand Zain Insure with vehicle and device offerings.

Zain Ventures, the Corporate Venture Capital Arm, evolved as an active player with a focus on strategic investments in areas of AI, Fintech, Deep Tech, Gaming, SaaS, as well as looking for opportunities in SMR technologies, and industrial robotic AI as investment prospects. Notably, investments undertaken by Zain Ventures have made substantial contribution to the bottom line.

With respect to entrepreneurial innovation, Zain Great Idea saw the regional expansion of the program in 2025, providing participants with exposure to create pathways for growth in innovation within the entrepreneurial ecosystem.

Zain Omantel International (ZOI) continues to drive growth, proving the company has created value for the region with respect to its subsea connectivity. ZOI is also developing a data center strategy to have a connected data center for the region.

ZainTECH defined its go-to-market strategy in Kuwait and Jordan in 2025, and established related operational boundaries for Zain Kuwait B2B, Zain Jordan B2B, leading to formidable collaboration with positive value creation being achieved. Zain Iraq and Zain KSA will follow suit.

Through TASC Towers, the infrastructure play is expected to create the region's largest Tower entity and impact Zain's CO_2 emissions positively. In 2025, the company, as an independent entity, underwent a management reshuffle that aims to scale it to new heights by providing shared telecom infrastructure services to multiple mobile network operators across the region, as well as consolidating the Zain's tower portfolio in Kuwait during 2026.

Developments across other areas of the business also led to impressive synergies between the Group and operating companies. Group Technology crystalized roadmaps for its satellite strategy, AI, data management and ICT strategy. The company also launched its Digital Factory in Kuwait, KSA and Iraq, while establishing a blueprint for other operating companies to replicate and build the same. The Digital Factory program establishes an innovation hub for app development for digital services and has the potential to be the cornerstone of a center of excellence for AI.

On the climate change front, Zain implemented smart sites which is a combination between power solutions and radio. The company enabled radio functionality to optimize power consumption, leading to power savings. Zain also started the implementation of green sites, including solar – small configuration sites requiring less power. The sites were rolled out in South Sudan and proof-of-concepts are being developed in KSA and Iraq.

For Zain, technology is a tool to provide long lasting value across the organization, and in 2025, the company formalized its organizational purpose of "Better Lives, Lasting Connections." differentiating us from other MNOs.

Our organizational purpose is tied in with the aspiration to create value for the business, society, and the environment is encapsulated in the '4WARD – Progress with Purpose' strategy that aims to position the company as a leading tech conglomerate. 4WARD is driven by four forces and 12 accelerators to ensure that every functional area of the business plays a part in making the strategy a reality.

To reinforce our commitment to value creation, our 2025 Sustainability Report was developed using the Integrated Thinking Framework highlighting the tradeoffs of our business decisions and the six capital areas the company draws/depends on.

Through this report using the ITF, we hope to influence the development and uptake of an integrated approach to business focusing on value creation for all.

We offer our appreciation to His Highness the Amir of the State of Kuwait, Sheikh Meshal Al Ahmed Al Jaber Al Sabah, and the members of the Governments in the markets in which we operate for their invaluable support.

Sincerely,
Bader N. Al Kharafi

05 Message from the Chief Sustainability Officer



In the complex nature of our modern reality, 2025 was a year of growth, innovation and reinvention. The year saw the flourishing of the '4WARD – Progress with Purpose' strategy across the company and its value chain, as well as the crystallization of Zain's organizational purpose centered on *"Better Lives. Lasting Connections"* to continue propelling Zain's workforce towards excellence grounded in human centricity

2025 represents the completion of the Corporate Sustainability Strategy 2020 - 2025, which provided a formalized pathway for the organization to address socio-economic and environmental impacts and deficits, uplift the communities Zain serves across its operating markets while ensuring we are able to make inroads through our core business activity as we recognize that access to connectivity is one the greatest enablers for socio-economic development.

Zain aims to ensure that meaningful connectivity is a force to systemic change as it is only through this approach that opportunities will arise spearheading inclusive development. The complexities of the MENA region, characterized by one of the largest youth bulges in the world, with high unemployment levels, coupled with geo-political tensions and uncertainties, place further pressure on progress, which at times derail development altogether. It is for this reason that the company is centered on value creation with a measured approach.

It is rewarding to see the evolution of the company's sustainability agenda and be able to witness the changes created due to our strategic direction, efforts and dedication. Across the organization, employees of Zain are all connected with a purpose to do good, to excel, and to contribute towards lasting change.

On the conclusion of the 2020-2025 sustainability strategy divided into four pillars: Climate Change; Operating Responsibly; Inclusion; and Generation Youth, it is gratifying to witness Zain's contributions in sustainability.

Over the period of five years, the company's achievements and commitments entailed the establishment of the Climate Action Committee, formalizing the required governance to tackle climate change; becoming a signatory of the GSMA's Principles for Driving the Digital Inclusion of Persons with Disabilities; introducing a three-year Group-wide partnership with UNICEF, and the formalization of the Women in Tech program for the Group and operating companies.

The protection of children in the online space was addressed through the launch of the highly successful Internet Monsters online safety awareness campaign, as well as using UNICEF's MO-CRIA to ensure children's rights are embedded across the business. Additionally, Zain scaled up the implementation of blocking mechanisms of child sexual abuse material (CSAM) across six operations.

Further, the company also ensured that CO_2 emissions reduction targets were formalized, measured and tracked. Progress in matters related to climate change saw the company become a member of the UN Global Compact, formalizing its commitment and finalizing its Science Based Targets Initiative (SBTi). Zain also launched its Waste Management Policy Statement and related compliance framework.

To ensure full transparency and accountability, Zain expanded its assurance process to include both levels of external assurance entailing Reasonable and Limited Assurance. To track progress on sustainability KPIs, Zain implemented an Environmental, Social, and Governance (ESG) Data Management Platform that centralizes and automates the data collection of more than 200 indicators.

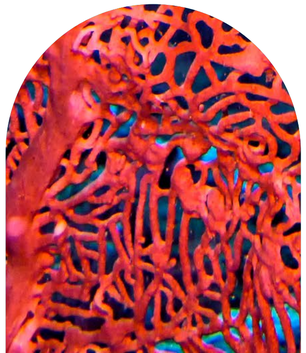
As the current five-year Corporate Sustainability Strategy comes to an end, preparations are underway to redefine the next five years strategic KPIs, centered on ESG, and value creation with an inclusive, expansive approach.

The 2025 Sustainability Report already sets the path forward with the implementation of Integrated Thinking Principles as Zain aims to become holistic in its approach to business decisions to demonstrate the value created because of Zain's business activities over the short, medium and long-term.

In 2026, Zain will focus on cementing value creation and ensuring the company remains true to the promise of creating a wonderful world.

Sincerely,
Jennifer Suleiman





06 2025 Highlights



Products and Services:

n 2025, Zain Esports delivered 64 tournaments and activations, engaging a total of 84,487 registrants and attendees across its operations in Kuwait, Bahrain, Jordan, and Iraq. Since inception in 2021, Zain Esports has attracted approximately 234,714 participants and garnered 550 million+ social media impressions regionally.

Zain Great Idea (ZGI) launched its first regional edition in 2025, expanding from Kuwait into five additional markets and attracting 600+ applicants, from which 13 startups were selected for intensive bootcamps with ZainTECH, Zain Ventures, and global experts.

In 2025, Zain Omantel International (ZOI) continued to enhance its offerings for regional operators, hyperscalers, data centers, cloud providers, and international carriers—serving over 50 million subscribers across eight markets while supporting some of the most demanding global connectivity requirements.

People and Purpose:

UNITY, Zain's internal transformation program aiming to infuse 'Purpose and Customer Experience' into company's DNA continued to evolve in 2025, aligning with the new '4WARD–Progress with Purpose' strategy. The initiative represents Zain's journey toward becoming a purposeful and human-centric organization, built on three interconnected pillars: Purpose, Employees, and Customers.

In 2025, Zain marked a significant milestone in its inclusion journey with the launch of the WE ABLE 2030 Vision, setting a bold new direction for disability inclusion across the Group.

8,254 employees were upskilled through Zain's training programs, reinforcing the company's digital transformation efforts.

Sustainability Agenda:

In 2025, Zain migrated all sustainability KPIs onto a cloud-based Environmental, Social, and Governance (ESG) data monitoring platform, aligning 200+ KPIs across functions, onboarding departments, and implementing structured training, governance controls, and a multi-tier review and approval flow to ensure accuracy, consistency, and audit-ready ESG reporting.

Zain initiated a comprehensive data collection process across all operations to quantify the different types of waste generated within the company. This marks the first step toward establishing a Group-wide waste baseline, which will serve as a foundation for setting measurable reduction and elimination targets.

To date, Zain has reached a total of 218,233 elderly individuals through its initiatives that span across workshops on data privacy, and digital literacy.

Kuwait

ANNUAL REVENUE (USD M)	1,260
CUSTOMERS (M)	2.6
FULL-TIME EMPLOYEES	1,663
TOTAL CAPEX (USD M)	274

- Zain Kuwait continued its 27-year partnership with Kuwait Dive Team to protect marine ecosystems, collecting 127,000 KG of marine waste as well as monitoring the health of marine ecosystems in partnership with University of Queensland.
- In 2025, Zain Kuwait significantly expanded its Women in Tech flagship program from seven participants to 550 women under its MoU with Box Hill College, Gulf University for Science and Technology, and Kuwait University. This year, the program also included six participants with disabilities, with training focused on access management, cybersecurity, cloud, data, and AI.
- Aligning with the GSMA Privacy and Security Principles, Zain Kuwait reinforced its commitment to digital responsibility by offering 94 participants free data-privacy awareness sessions, promoting digital inclusion for outsourced support staff.

Bahrain

ANNUAL REVENUE (USD M)	219
FULL-TIME EMPLOYEES	246
TOTAL CAPEX (USD M)	36

- Since 2024, Zain Bahrain recycled and reduced 40 tons of paper waste.
- A total participation of 366+ youth reached through green skills workshops and mentorship and coaching opportunities in partnership with Manama Hub established by the World Economic Forum.

Iraq

ANNUAL REVENUE (USD M)	1,292
CUSTOMERS (M)	20.9
FULL-TIME EMPLOYEES	1,577
TOTAL CAPEX (USD M)	555

- Zain Iraq continued implementing its Women in Tech program, surpassing its 200-participant target by enrolling 318 women, following an overwhelming 1,000-person application surplus. The program covered key digital skills including Web Development, Networking Essentials, Data Analysis, Cybersecurity, and Mobile App Development.
- Throughout the year, seven data privacy awareness sessions were conducted with topics that included risks of data breaches and protecting personal information, reaching 370 attendees from marginalized segments.
- Zain Iraq, in collaboration with MOLSA and Computiq, launched the CS50 Python program certified by Harvard, to empower 20 persons with disabilities, providing training in Python, HTML, CSS, and Flask to build digital skills and expand tech-career opportunities.

Jordan

ANNUAL REVENUE (USD M)	595
CUSTOMERS (M)	4.2
FULL-TIME EMPLOYEES	1,317
TOTAL CAPEX (USD M)	88

- Over the past five years, Zain Jordan has continued advancing eSIM adoption, gradually phasing out physical SIM cards and reducing more than 400 kilograms of plastic waste.
- Continued its flagship Mobile Maintenance Center program, where Zain Jordan enhanced the initiative by extending total training duration from three to six months and introduced specialized modules in gaming-console maintenance, reaching 140 people in 2025.
- Launched in 2025, a partnership with Royal Jordanian Airlines introduced tablets across seven airport counters to support passengers with hearing impairments.

Saudi Arabia

ANNUAL REVENUE (USD M)	2,927
CUSTOMERS (M)	8.1
FULL-TIME EMPLOYEES	1,593
TOTAL CAPEX (USD M)	357

- Zain KSA continued providing its Persons with Disabilities (PWD) bundle, reaching 840 subscribers in 2025.
- In efforts to promote circularity, Zain KSA partnered with the Communications, Space and Technology Commission to launch an e-waste recycling initiative called “Recycle Your Device,” reaching 140,000 people through social-media campaigns.

Sudan

ANNUAL REVENUE (USD M)	661
CUSTOMERS (M)	12.3
FULL-TIME EMPLOYEES	822
TOTAL CAPEX (USD M)	98

- Zain Sudan continued its signature vocational training initiative aimed at equipping Sudanese youth with practical, market-relevant skills in areas such as solar energy, electronics, and food manufacturing. The two-month program reached 715 trainees in 2025, bringing the total number of beneficiaries to 1,965 since inception.
- In partnership with DARAJA Climate Emergency Service, Zain Sudan issued 11 bulk SMS alerts across vulnerable regions, reaching over 9 million people with critical early-warning messages on severe flooding risks.
- Zain Sudan launched its Back-to-School program to support basic education in six conflict-affected states, helping over 5,000 students return to school in a safer environment. The initiative provided 1,090 school benches, 3,004 sets of uniforms, and essential learning materials such as stationary and 800 engineering sets.

South Sudan

FULL-TIME EMPLOYEES	191

- Zain South Sudan launched a healthcare initiative in Twic County by establishing a Zain-supported clinic in Wunrok, providing essential medical equipment, medicines, and improved access to basic health services to target 10,000 vulnerable individuals. The initiative strengthens local health systems, reduces long-distance travel for care, and enhances community well-being through screenings, vaccinations, and ongoing medical support.
- This year, Zain South Sudan reestablished its partnership with the Whitaker Peace & Development Initiative (WPDI) and launched the following programs:

Women and Youth Empowerment through ICT Skills
Green Skills Development
Increasing Job Readiness for Youth

ZainTECH

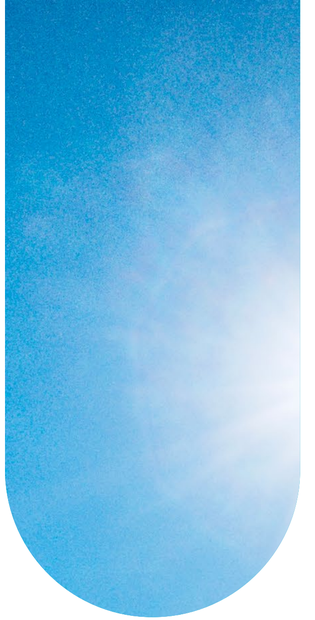
ANNUAL REVENUE (USD M)	183
FULL-TIME EMPLOYEES	633

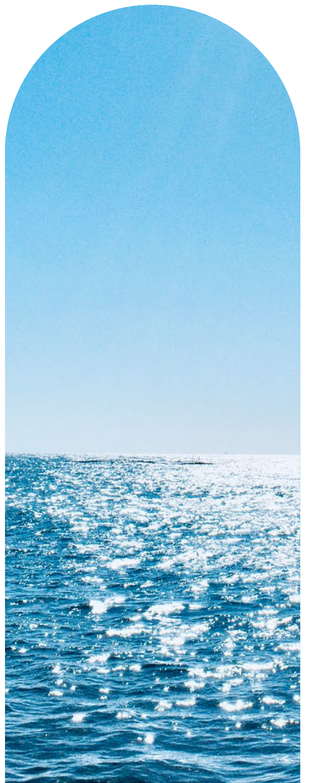
- ZainTECH recorded a 16% year-on-year increase in total contract value (TCV).
- Microsoft licensing and services grew by 83% compared to the previous year.
- Overall revenue rose by 50%, with margins improving by 31% and EBITDA increasing by 53% year-on-year.

Zain Omantel International (ZOI)

ANNUAL REVENUE (USD M)	401

- In 2025, ZOI expanded its collaboration with regional and global carriers, major hyperscalers, and cloud service providers. These partnerships enhanced ZOI's international footprint and positioned it as a preferred wholesale partner for high-capacity routes between Asia, the Middle East, Europe, and Africa.
- ZOI continued to maintain its influential role within the One Consortium, reinforcing the region's commitment to tackling illegal and unwanted international voice traffic. By improving coordination and intelligence exchange, ZOI further strengthened the regional trust and resilience in telecommunications security during 2025





07 Awards



Zain Group



"Best Corporate Governance in Kuwait 2025" award from World Finance, its fifth consecutive recognition



IDEU online master's program with IE University won Silver in the 2025 EFMD "Professional Development" category



Ranked first in the regional telecom sector on Forbes' "World's Best Employers" list

Zain Kuwait:



Wins five prestigious global awards at MWC Barcelona for Telecom Excellence

Zain Jordan:



Won the 2025 Middle East Technology Excellence Award for its data and disaster recovery center, "The Bunker"

Zain Bahrain:

Honored with Best-Connected Customer Experience Award by IST Networks & Genesys



Recognized by the GCC Labor Ministers Committee for achieving a 93.33% Bahraini workforce

Zain Saudi Arabia



Yaqoot by Zain KSA Wins Two MENA Digital Awards 2025 Recognized for digital excellence and delivering a best-in-class communications experience



Named "Leader" in MSCI ESG Index with Upgraded AA Rating



Wins 3rd place in Best ESG & Sustainability Report at MEIRA IR Awards



Wins Gold CSR Award for the second consecutive year

ZainTech:



"Best Digital Solutions Provider" at the Tech Innovation Awards 2025



Veeam's Middle East Top Performing Cloud Partner of the Year at the 2024 ProPartner Awards



Achieves CSA STAR certification, advancing regional cloud security compliance

ZOI:



Takes home four major industry Awards – Reinforcing its role as the Middle East's Connectivity Powerhouse



08 Our Strategy

‘4WARD - Progress with Purpose’: Accelerating Zain’s evolution to a purpose-driven TechCo

Building on the strong foundations of the 4SIGHT corporate strategy, which was implemented across Zain between 2019-2024, the company is accelerating its transformation with ‘4WARD-Progress with Purpose’, a strategy designed to unlock Zain’s full potential as a customer-centric, future-proof, and purpose-driven tech conglomerate.

4WARD builds on the significant momentum and transformational accomplishments made under 4SIGHT whereby Zain emerged as a multi-core digital player, successfully transforming its fixed and mobile services and expanding into several new business verticals including ICT, Digital mobile operations, Fintech, Entertainment, Digital Infrastructure, Subsea and Cross-Border Connectivity, and more.

Zain remains aligned with the rapid shifts shaping the digital landscape, responding to these changes with an approach focused on continuous evolution and practical execution. This outlook ensures the organization adapts to new technologies, emerging customer needs, and industry transformations in a deliberate and purpose-driven way. At the heart of this transition is Zain’s commitment to Progress with Purpose, ensuring that the company’s growth fuels long-term value for customers, communities, and the environment. This core belief is clear in Zain’s purpose: “Better Lives, Lasting Connections”

Accelerating Zain’s Transformation

The 4WARD strategy is anchored in a clear vision of propelling Zain into the next era as a leading regional Tech Conglomerate (TechCo). It is a strategy driven by purpose that places at its heart the company’s enduring bond with its customers and the communities it serves. It reaffirms Zain’s commitment to digital innovation, powered by the collective strength of its people and capabilities, while emphasizing the seamless harmonization of resources and value flows across all operations and partnerships within the wider Zain ecosystem.

4WARD unfolds through four key forces, designed to drive the company forward to create value and unleash the full potential of the updated Zain strategy, operating in a complex and interdependent ecosystem of telecom, tech subsidiaries, and digital ventures. Within four driving forces, 12 accelerators emerge to propel the company’s progress:

Force 1: Customer Delight: Placing Customers at the Core

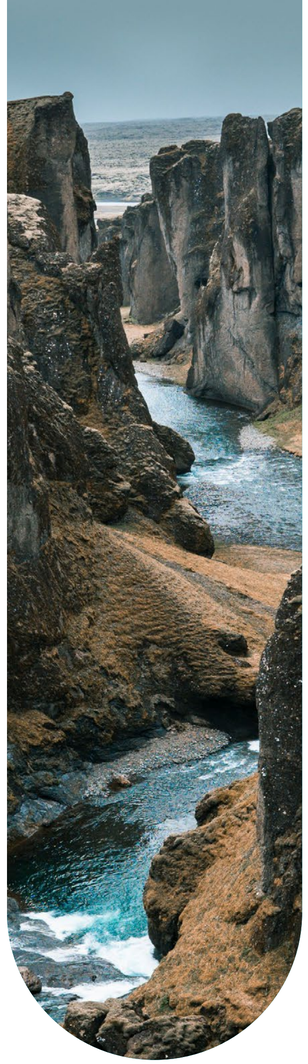
Zain is committed to exceeding expectations and delivering seamless experiences across Consumer, Enterprise, and Government segments. This force is driven by the following three accelerators:

a. One Delightful Experience: A unified, customer-first approach to enhance satisfaction and loyalty.
b. Business Partner of Choice: Strengthening Zain’s role as the trusted enabler of digital transformation for businesses and governments.
c. Superior Fixed & Mobile Connectivity: Delivering next generation fixed and mobile networks to meet evolving customer demands.

Force 2: Digital Zain: Scaling Innovation & Digital Growth

Zain is leveraging digital solutions and emerging technologies to enhance service capabilities and drive new revenue streams. This force is ignited by the following three accelerators:

a. Digital Finance: Scaling Fintech into a regional powerhouse, expanding its portfolio to include banking and insurance services.
b. AI & Digital Innovation: Establishing an AI-driven digital ecosystem that unlocks new business models and enhances efficiency.
c. Digital Infrastructure: Expanding Zain's digital infrastructure by introducing a portfolio of regional Data Centers to support hyperscalers, enterprises and governments.





Force 3: Purpose and Action: Driving Growth with Responsibility

At Zain, business success is guided by purpose and aligned with meaningful impact—ensuring that innovation is driven by a commitment to sustainability, inclusion, and long-term value creation. This force is powered by the following three accelerators:

a. Purpose: Embedding Zain’s core values into every aspect of the business, fostering an ecosystem of sustainable growth.
b. Inclusion, Diversity & Equity: Advancing equitable opportunities and cultivating a diverse, forward-thinking workforce. Zain continues to embed IDE principles across its talent practices, leadership development, and workplace culture, ensuring that all employees feel represented, supported, and empowered to contribute meaningfully. Please visit our People and Purpose section to learn more about Zain’s IDE initiatives.
c. Sustainability: To provide meaningful connectivity that leads to systemic change through initiatives that create value across environmental, social, and governance (ESG) priorities. This includes managing climate change impacts, strengthening data privacy and human rights processes, responsible supply chain processes, and expanding efforts in digital inclusion and community impact. The company also continues to enhance its ESG governance, and transparency in alignment with global standards.

Force 4: Collaborative Growth: Strengthening People & Partnerships

Zain is empowering its people and fostering cross-industry collaboration to unlock synergies across its ecosystem. This force is fueled by the following three accelerators:

a. People: Building a high-performance, engaged workforce that thrives on collaboration and inclusivity.
b. Enhanced Collaboration: Breaking silos to drive efficiency and enable seamless knowledge-sharing across Zain’s entities and business units.
c. Partnerships: Expanding strategic collaborations to drive growth and unlock new market opportunities.

A cohesive strategy embracing integrated thinking

Emerging from within Zain, 4WARD was built from the bottom up through active, iterative engagement with Zainers across all levels of the organization ranging from executive management to representatives spanning the full spectrum of functions and expertise. The strategy was also complemented by integrating external views from several subject matter experts, market research and investor expectations. The strategic process that led to the development of 4WARD is a testimony of an integrated cross-functional alignment and stakeholder involvement.

In its foundations, 4WARD embraces integrated thinking:

- Purpose-led, embodying "Progress with Purpose"
- Stakeholders are central to the strategy and explicitly addressed (B2C, B2B customers, partners, and Zain People).
- Positive societal impact is integral to the strategy, along with business growth. ESG goals are embedded within 4WARD, not treated as a separate agenda.
- 4WARD's Analytics and AI pillar operationalizes integrated thinking through data integration.
- Collaboration between the different business clusters of Zain is a cornerstone of 4WARD. The concept of collaboration is central within the ecosystem of the company, between its people and entities but also outside the Zain realm through forging strategic and value-creating alliances.
- 4WARD drives value across all six capitals:

During the development and revision of the strategy, opportunities and potential risks have been considered. Strong opportunities to drive growth include enhancing digital capabilities, centralizing customer experience, and embedding purpose-led practices, which together can unlock new revenue streams, strengthen customer trust, and position the company as a leading tech conglomerate. However, these opportunities come with possible risks, including cybersecurity threats, execution challenges in digital transformation, regulatory pressures, and the complexity of aligning people, systems, and partnerships across markets.

The following details the impact of each accelerator under '4WARD – Progress with Purpose' on the six capitals:

Financial: Sustainable revenue and diversification through new digital verticals.

Human: Empowering people through upskilling, inclusion, and leadership development.

Intellectual: Leveraging data, AI, and innovation capabilities.

Social & Relationship: Building trust with customers, communities, and partners.

Manufactured: Expanding digital and network infrastructure.

Natural: Reducing emissions and driving energy efficiency.

MATERIAL TOPIC

Customer Privacy & Data Security, Customer Service, Digital Transformation, Digital Inclusion, Selling Practices & Product Labeling, Business Ethics & Governance, Competitive Behavior

SUB-TOPIC

Customer Delight

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Focusing on customer delight strengthens Social & Relationship Capital by building trust, boosts Human Capital through better service skills, and enhances Manufactured and Intellectual Capital by improving networks and digital channels. The main trade-off is increased short-term spending, which affects Financial Capital, while Natural Capital is only slightly influenced.



MATERIAL TOPIC

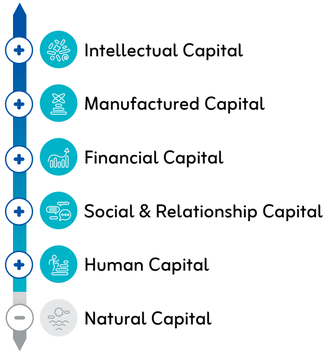
Customer Privacy & Data Security, Management of Legal & Regulatory Environment, Economic Performance, Supply Chain Management, Customer Service, Business Ethics & Governance, Competitive Behavior

SUB-TOPIC

Digital Zain

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Digital growth increases Intellectual, Manufactured, and Financial Capital through new platforms and revenue, strengthens Social & Relationship Capital through improved digital services, and lifts Human Capital through advanced skills, with minimal direct effect on Natural Capital.



MATERIAL TOPIC

Inclusion, Diversity & Equity, Human Rights, Philanthropy & Community Engagement, Responsible Consumption & Production, Waste Management, Biodiversity & Nature Impacts, Climate Change, Socio-economic Compliance, Business Ethics & Governance, Business Model Resilience, Children's Rights, Labor Practices, Employee Health & Safety, Supply Chain Management, Natural Capital, Physical & Sociopolitical Risks, Workforce Management

SUB-TOPIC

Purpose & Action

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Purpose-driven action strengthens Social & Relationship Capital by building trust, enhances Human Capital through an inclusive and fair workplace, and supports Natural Capital through stronger environmental practices. It also grows Intellectual Capital by embedding ESG thinking into decision-making and improves Manufactured Capital through more responsible operations, while Financial Capital may face short-term pressure due to investment in sustainability and inclusion initiatives.

- \+ Social & Relationship Capital
- \+ Human Capital
- \+ Natural Capital
- \+ Intellectual Capital
- \+ Manufactured Capital
- − Financial Capital

MATERIAL TOPIC

Inclusion, Diversity & Equity, Workforce Management, Labor Practices, Employee Health & Safety, Human Rights, Supply Chain Management, Business Ethics & Governance, Competitive Behavior, Philanthropy & Community Engagement, Socio-economic Compliance, Business Model Resilience, Physical & Sociopolitical Risks

SUB-TOPIC

Collaborative Growth

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Collaborative growth boosts Human Capital through stronger skills and engagement, enhances Social & Relationship Capital by improving partnerships and stakeholder trust, and supports Intellectual Capital through shared knowledge. It also improves Manufactured Capital via more efficient operations, with moderate impact on Financial Capital due to investment in people and partnerships and limited direct influence on Natural Capital.

- \+ Human Capital
- \+ Social & Relationship Capital
- \+ Intellectual Capital
- \+ Manufactured Capital
- − Financial Capital
- − Natural Capital





09 Corporate Governance

Governance Overview

Zain Group continues to reinforce a robust corporate governance framework aligned with international best practices, Capital Markets Authority (CMA) requirements, and the Group's long-term strategic direction. In 2025, governance enhancements focused on strengthening oversight, transparency, accountability, and integrated decision-making across all business units and subsidiaries.



Board Structure and Oversight

The Board of Directors maintained effective oversight of strategy, performance, risk, compliance, ESG matters, and stakeholder engagement. During 2025, the Board continued implementing enhancements to the Subsidiary Governance Framework, ensuring alignment across entities while respecting local regulatory contexts.

The Board consists of ten members, nine of whom are non-executive, including the Chairman. Two members are independent.

Board members serve a three-year term, with the possibility of extension in line with legal requirements. Board members maintain diverse external roles and responsibilities that complement their areas of specialization. A comprehensive overview of these commitments is provided in the Company's Annual Report.

Although Zain upholds a strong commitment to diversity and inclusion, the current Board consists exclusively of male members. The company's Board Diversity Policy aims to gradually enhance representation, including gender and under-represented social groups.

Board members collectively hold several significant external roles aligned with their expertise, spanning sovereign wealth funds, financial institutions, private equity, telecommunications, technology, and other sectors. These commitments, disclosed fully in the Annual Report, provide strategic insight that strengthens oversight and contributes to value creation across all areas.

The Board demonstrates strong competencies relevant to Zain's material impacts, including investment and financial management, telecommunications operations, governance and compliance, project management, and regional market understanding, supported by advanced academic qualifications. This skill mix enables effective oversight of strategy, sustainability considerations, and long-term value creation.

Shareholder participation forms a key component of Zain's governance model. All shareholders are invited to attend the Annual General Meeting (AGM) without fees, ensuring transparent decision-making on Board appointments and other major resolutions. Through this structure, competencies, and engagement approach, Zain's Board provides effective stewardship focused on responsible growth and sustainable value for all stakeholders.

Committees of the Board of Directors:

Zain's governance structure is led by the Board of Directors and supported by three committees: the Board Audit Committee (BAC); the Nomination and Remuneration Committee (NRC); and the Risk Committee (BRC). These committees oversee financial integrity, risk management, internal controls, ESG-related risks, and Board composition and succession, supporting oversight of the company's broader economic, environmental, and social considerations, and strengthening the foundations required for sustainable value creation across the business.

Board Audit Committee

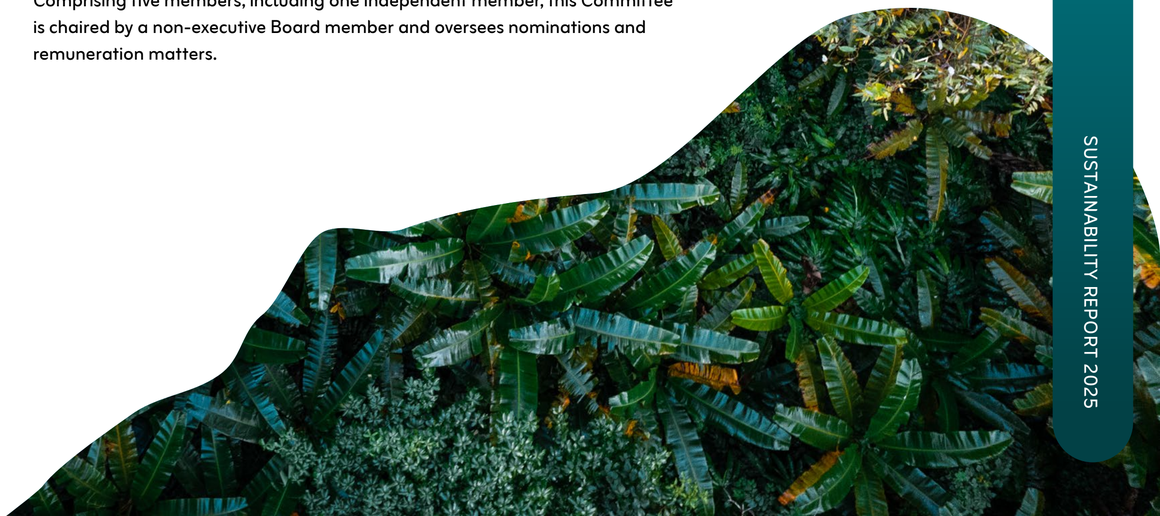
The Audit Committee consists of five members, with at least one being independent. The Chairman of the Board or any executive members are not permitted to sit on this committee, following Kuwait's laws and regulations.

Board Risk Committee

This Committee has five members, and as per local laws, the Board Chairman does not sit on this Committee.

Board Nominations and Remunerations Committee

Comprising five members, including one independent member, this Committee is chaired by a non-executive Board member and oversees nominations and remuneration matters.





Nomination and Selection of the Board and Its Committees

Nomination and Selection Processes

The nomination and selection processes for Zain's Board of Directors and its committees follow a structured governance framework overseen by the NRC. The NRC supervises candidate identification, assessment, and recommendation in line with legal and regulatory requirements, the Articles of Association (AOA), and Zain's Corporate Governance Framework.

The NRC evaluates nominees based on their professional experience, integrity, and alignment with the company's strategic direction. Following the Committee's assessment, the final list of candidates is presented to shareholders at the Annual General Meeting (AGM), where members are elected through a transparent secret ballot system.

Board committees are formed after the Board's election. Their composition considers independence, skills, and role-specific requirements to support effective oversight in areas such as audit, risk, and remuneration – strengthening Zain's ability to create long-term value across financial, operational, human, and social dimensions.



Criteria Used for Nomination and Selection

Stakeholder Views

Stakeholder considerations are reflected through shareholder participation at the AGM, where voting directly influences Board composition. Engagement with shareholders and regulators further ensures that nominees are aligned with stakeholder expectations and the company's long-term value creation objectives.

Diversity

Zain's Board Diversity Policy encourages representation across gender, social groups, and professional backgrounds to enrich perspectives and enhance decision-making. Although the current Board is composed entirely of male members, the company continues to work toward broader representation in future cycles.

Independence

Independence criteria are defined in the AOA and relevant regulations. Independent members must represent at least 20% of the Board, ensuring objective oversight and safeguarding shareholder interests. Criteria for independence, loss of membership, and selection of the Chairman are outlined clearly in the AOA.

Competencies Relevant to Zain's Impacts

Board members are selected for competencies that align with Zain's material impacts and strategic priorities. These include expertise in investment and financial management, network and technology operations, governance and regulatory compliance, risk management, and knowledge of regional markets. These competencies enable the Board to guide the company responsibly and support sustainable value creation.

The Chairman of the Board at Zain

The Chairman of Zain's Board of Directors does not hold any executive position within the organization. This clear separation between governance and management is fully aligned with regulatory requirements and leading corporate governance practices. Maintaining a non-executive Chair supports objective oversight of the executive team, reinforces checks and balances, and helps ensure that Board deliberations remain unbiased and focused on the long-term interests of shareholders and stakeholders.

The Board's Role and Responsibilities

Role in Purpose, Strategy, and Sustainable Development

Zain's Board of Directors plays a central role in defining and approving the company's purpose, mission, values, and long-term strategic direction, including the integration of sustainable development into corporate strategy. Executive management is responsible for translating these strategic directives into operational plans, policies, and measurable objectives that address Zain's economic, environmental, and social impacts.

The Board provides oversight of climate action initiatives, human rights commitments, and broader environmental and social priorities, ensuring alignment with international Environmental, Social, and Governance (ESG) frameworks and sustainability best practices. Together, the Board and executive management work to regularly update the company's sustainability ambitions in line with evolving regulatory expectations, stakeholder priorities, and global benchmarks such as MSCI, FTSE, and S&P.

Role in Monitoring and Impact Management

The Board oversees Zain's processes for identifying, assessing, and managing impacts on the economy, environment, and people. This includes monitoring climate risks, digital safety initiatives, and programs that protect children's rights and support ethical, inclusive digital access.

1. Engagement with stakeholders

The Board considers stakeholder perspectives through structured engagement channels, including AGM feedback, regulatory interactions, market assessments, and sustainability reporting. These inputs help guide decision-making and strengthen the company's ability to address material impacts.

2. Considering the outcomes of processes

Findings from processes (including ESG performance evaluations, climate risk analyses, and social impact assessments) are reviewed by the Board to ensure strategic alignment, support innovation in sustainable technology, and reinforce long-term value creation for stakeholders.

Review of Effectiveness and Frequency

The Board conducts regular reviews of the effectiveness of Zain's impact-management processes, typically on a quarterly basis. These reviews assess the alignment of policies and controls with regulatory expectations, strategic objectives, and global sustainability standards. Outcomes of these reviews inform ongoing improvements, ensuring that Zain maintains robust governance and continuously enhances its ability to manage impacts responsibly.

Delegation of Responsibility for Managing Zain's Economic, Environmental, and Social Impacts

Delegation by the Board

1. Appointment of Senior Executives

Zain's Board appoints key executives to manage the company's impacts on the economy, environment, and people. These roles directly support the company's strategy and long-term value creation:

- **Chief Sustainability Officer (CSO):** Leads the company's sustainability strategy, oversees environmental performance and climate action initiatives, and ensures alignment with global frameworks. The CSO's work contributes to reducing environmental impacts while enhancing operational resilience and long-term strategic value.
- **Chief Purpose & HR Officer:** Manages human capital development, organizational culture, and workforce well-being, supporting the company's long-term capability building and contributing to both human and intellectual capitals.
- **Chief Corporate Affairs & Communications Officer:** Ensures compliance with governance regulations and transparent reporting on Zain's economic, environmental, and social performance. This role supports trust with regulators and stakeholders.

2. Delegation to Other Employees

These executives further delegate responsibilities to specialized teams across sustainability, governance, regulatory affairs, and operations. Employees within these functions support the implementation of initiatives, monitor progress, and ensure compliance with policies related to economic performance, environmental stewardship, and social responsibility. Their work strengthens the company's operational systems, enhances knowledge management, and supports value creation across multiple areas.

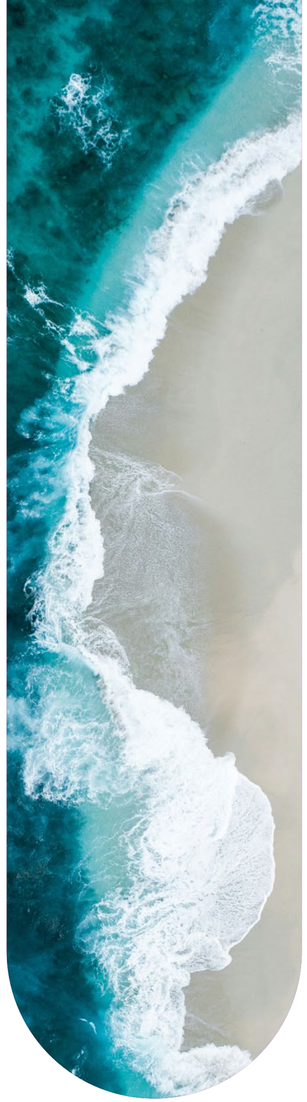
Reporting Processes and Frequency

Senior executives and relevant employees report back to the Board through structured and regular mechanisms.

- **Quarterly reporting:** Executive management provides the Board with quarterly updates on performance, ESG initiatives, risk management, and overall impact management.
- **Annual reporting:** Management prepares and submits the Sustainability Report, the Annual Governance Report, and the Company's Annual Report for Board review and approval. These reports consolidate the organization's economic, environmental, human rights, and social impacts, highlighting progress and areas for improvement.

These reporting processes help the Board maintain clear oversight of the company's key impacts and enable informed, transparent decision-making that strengthens Zain's long-term performance and overall value for stakeholders.







Review and Approval of Reported Information

Zain's Board of Directors is responsible for reviewing and approving all reported information, including the company's material topics. The process ensures accuracy, transparency, and alignment with the company's strategic direction and long-term value creation objectives.

Executive management provides the Board with regular briefings throughout the year, including quarterly, semi-annual, and annual updates. These briefings present a full picture of the company's performance, risks, sustainability initiatives, and progress on strategic priorities.

The information submitted to the Board combines both qualitative insights and quantitative metrics, covering key performance indicators, progress toward sustainability commitments, and any emerging issues that could affect the company's operations, people, or broader stakeholder landscape. This enables the Board to gain a comprehensive understanding of Zain's economic, environmental, and social impacts, as well as evolving regulatory developments and future opportunities.

As part of its oversight, the Board reviews and assesses the information to confirm alignment with the company's strategy, governance requirements, and stakeholder expectations. The process is supported by specialized Board committees, internal functions, and independent auditors, ensuring that the information is accurate, reliable, and thoroughly examined.

Once this review is complete, the Board grants final approval, reaffirming Zain's commitment to transparency, strong governance, and long-term value creation across its operations.

Conflicts of Interest

Zain maintains a governance system built on integrity, transparency, and the protection of stakeholder interests. A core pillar of this system is the company's Conflict of Interest Policy, which ensures that personal interests never compromise corporate decision-making. The Board of Directors, executive management, and all key personnel operate under clear obligations to identify, disclose, and address any actual or potential conflicts in accordance with local regulatory requirements and international best practices.

Preventing and Mitigating Conflicts of Interest

Zain applies several structured processes to prevent conflicts before they arise and to mitigate them effectively when they do:

- **Mandatory Disclosure:** Board members and executives must proactively declare any personal or professional interests that may interfere with company activities. These declarations are documented and reviewed to ensure full transparency.
- **Decision-Making Safeguards:** Individuals with a declared interest are excluded from discussions and voting on related matters. This preserves objectivity and protects the integrity of Board and management decisions
- **Independent Assurance:** Transactions representing 10% or more of total assets trigger the appointment of an independent expert, who provides an impartial assessment to the General Assembly. This external review strengthens trust in major decisions, particularly those involving related parties or controlling shareholders.
- **Formal Review and Investigation:** All reported conflicts are subject to structured examination by the Board. Where a member is involved, they are removed from the process to avoid influencing the outcome.
- **Corrective and Disciplinary Actions:** Confirmed breaches may lead to disciplinary measures, including suspension or termination, underscoring the company's zero-tolerance stance.

Collectively, these measures reinforce Zain's ability to make balanced, risk-aware decisions that support long-term value creation and operational resilience. By safeguarding shareholder value, Zain ensures that financial resources are allocated carefully and protected from bias. Strong governance over major investments enhances infrastructure, ensuring that network and operational advancements are based solely on merit and strategic need. Transparent oversight also supports environmental integrity by preventing decisions that could compromise natural resources or sustainability goals. A culture of accountability enriches corporate culture, reinforcing employee trust, ethical conduct, and leadership credibility. Clear governance processes strengthen process knowledge, and enhance internal systems, decision-making structures, and cumulative organizational experience. Finally, transparent disclosures and ethical conduct elevate trust, deepening confidence among regulators, customers, partners, and society at large.

Disclosure of Conflicts of Interest to Stakeholders

Zain is committed to openly communicating relevant conflicts of interest to stakeholders in a clear and structured manner. The governance framework requires disclosure in the following areas:

Cross-Board Membership

Board members must disclose positions they hold in other entities. These disclosures are assessed to ensure such roles do not compromise objectivity or influence Zain's strategic decisions.

Cross-Shareholding with Suppliers and Other Stakeholders

Any shareholdings or financial interests in suppliers, partners, or other stakeholders must be declared. The Board evaluates these cases to ensure decisions remain impartial and competitively driven.

Existence of Controlling Shareholders

Transactions involving controlling shareholders receive heightened scrutiny. Significant transactions (10%+ of assets) require an independent expert report shared with the Board and the General Assembly, supporting transparency and fairness.

Related Parties: Relationships, Transactions, and Balances

Zain's Related Party Transactions Policy mandates the disclosure of all related-party relationships, transactions, and outstanding balances. These disclosures are reviewed by management, the Board, and external auditors, ensuring accuracy and alignment with shareholder and stakeholder interests.

Both the Conflict of Interest and Related-Party Transactions Policies were reviewed and approved by the Board and subsequently revamped to introduce an additional layer of assurance and control through the Compliance Department, which operates independently and reports directly to the Board Risk Committee (BRC).



Communication of Critical Concerns to the Board

Zain's Whistleblowing Policy forms a core element of its governance system, ensuring that serious concerns (ethical, operational, environmental, or social) are safely reported and escalated to the Board. The policy is fully aligned with Kuwaiti legal requirements, which mandate the protection of whistleblowers and ensure confidentiality and non-retaliation. The process not only safeguards integrity but also directly supports the organization's financial strength, operational resilience, environmental responsibility, people development, governance maturity, and stakeholder trust.

How Critical Concerns Reach the Board and Strengthen Value Creation

Secure and Confidential Reporting Channels:

Employees and external stakeholders can anonymously report issues related to misconduct, governance breaches, or ESG violations. Protecting whistleblowers and encouraging transparency reinforces trust, strengthens the company's ethical culture, and promotes a safe and supportive workplace. This contributes to stronger people practices and helps build credibility with the broader community and regulators.

Immediate Escalation of Serious Matters:

Once a serious concern is received, defined escalation pathways ensure that it reaches executive management or the Board without delay. This timely response protects the company from potential financial losses, compliance failures, and reputational damage. It also safeguards the continuity and reliability of operations, ensuring that critical services and infrastructure remain stable and well-managed.

Continuous Oversight Through Regular Updates:

Executive management provides the Board with periodic briefings on all reported matters, giving Board members visibility over trends, root causes, and corrective actions. This strengthens the organization's ability to learn, adapt, and improve its internal systems and decision-making processes. It also helps identify environmental or social risks early, ensuring responsible management of resources and reinforcing Zain's commitment to sustainable and responsible operations.

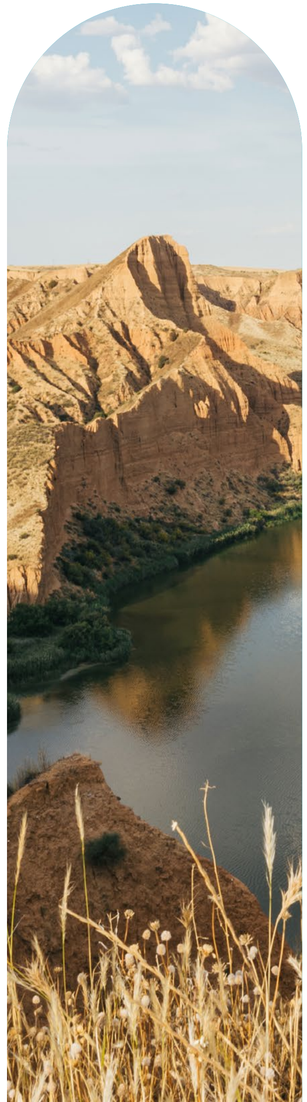
Through this integrated reporting and escalation approach, Zain ensures that critical concerns are addressed transparently and transformed into opportunities to strengthen ethics, mitigate risks, and maintain trust with employees, regulators, partners, and society at large.

Summary of Critical Concerns Reported

During the reporting period, no critical concerns were communicated to the Board.

Board Oversight of Sustainable Development and Impact Management

Zain's Board plays a central role in guiding the company's approach to sustainable development and overseeing its impacts on the economy, environment, and society. To ensure the Board remains well-equipped for this responsibility, Zain maintains an ongoing learning and development program that is regularly enhanced to reflect the latest ESG standards, regulatory expectations, industry trends, and sector-specific sustainability challenges. These training efforts strengthen the Board's ability to provide informed oversight, support responsible growth, and contribute to long-term value creation financially, operationally, socially, and environmentally.



Board Performance Evaluation

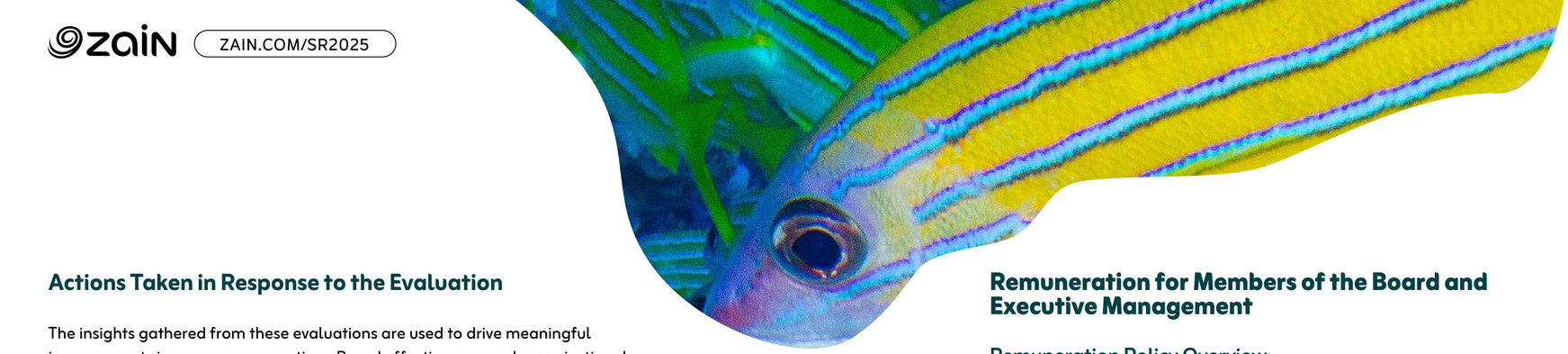
Each year, the Board undertakes a structured self-assessment to evaluate how effectively it oversees Zain's economic, environmental, and social impacts. However, in line with best practice, this year the Board is conducting an independent third-party assessment as part of its approach to alternating between the two evaluation methods over successive years. The assessment covers several core areas:

- **Governance & Compliance:** The Board's adherence to corporate governance principles, regulatory expectations, and ethical conduct.
- **Strategic Leadership:** The degree to which sustainability considerations are embedded into strategic planning and long-term decision-making.
- **Risk Oversight:** The effectiveness of identifying, assessing, and mitigating ESG-related risks that could impact business continuity, financial stability, or stakeholder trust.
- **Stakeholder Engagement:** The Board's effectiveness in overseeing the company's engagement with regulators, shareholders, employees, partners, and communities.
- **Financial and Operational Oversight:** Ensuring sustainable financial performance and resilience through sound oversight of the company's resource allocation, investments, and operations.

Through this evaluation process, the Board reflects on its alignment with Zain's mission and assesses whether it is sufficiently supporting sustainable value creation across all parts of the business—from strengthening workforce capabilities to protecting natural resources, enhancing operational systems, and maintaining strong relationships with stakeholders.

Independence and Frequency of the Evaluation

This performance assessment is conducted annually, ensuring consistent and timely reflection on the Board's effectiveness. In line with recognized governance standards, Zain alternates between internal self-assessments and independent third-party evaluations. This year, the Board is undergoing an external review, incorporating updated regulatory expectations and emerging sustainability requirements. This alternating approach ensures the evaluation process remains thorough, objective, and fully aligned with global best practice.



Actions Taken in Response to the Evaluation

The insights gathered from these evaluations are used to drive meaningful improvements in governance practices, Board effectiveness, and organizational performance:

Enhanced Training and Development:
Identified gaps are addressed through refined training programs that deepen Board members' understanding of ESG developments, sector-specific sustainability risks, and regulatory changes. This strengthens the Board's ability to govern responsibly, support long-term performance.

Strengthening Board Composition:
The Board reviews its composition periodically to ensure it retains the expertise necessary to oversee the company's strategic and sustainability priorities. During the reporting period, no changes to membership were required; instead, the Board focused on further strengthening the competencies of its current directors through targeted development and enhanced training, ensuring continued alignment with evolving regulatory expectations and emerging governance challenges.

Improvements to Organizational Practices:
The Board's evaluations drive improvements across governance, risk management, and stakeholder engagement, strengthening operational efficiency, supporting responsible practices, and reinforcing the systems that sustain Zain's long-term performance.



Remuneration for Members of the Board and Executive Management

Remuneration Policy Overview:
Zain's remuneration policy ensures a balance between fixed and variable pay for members of the Board and executive management. Fixed remuneration is based on the responsibilities and the specific career paths of individuals, reflecting their value to the company. Variable remuneration, on the other hand, is tied to the achievement of predefined goals, both financial and non-financial, to motivate and reward executive management based on individual and company performance.

Sign-on Bonuses or Recruitment Incentive Payments:
Sign-on bonuses or recruitment incentives are provided as needed, particularly when attracting top-tier talent. These incentives are aligned with the company's strategic objectives and competitive market conditions.

Termination Payments:
Termination payments are included as part of the approved contractual agreements, compliant with applicable laws. These may consist of end-of-service indemnity as stipulated by Zain's human resources policies and contractual agreements.

Retirement Benefits:
Retirement benefits include end-of-service indemnities and other benefits as per the applicable laws and regulations, ensuring that these packages remain competitive and aligned with Zain's human resources policies.

Board Remuneration
The total remuneration for the Board shall not exceed 10% of the company's net profits, calculated after accounting for depreciation, reserves, and the distribution of dividends to shareholders, which will not be less than 5% of the company's capital, or a higher percentage as outlined in the Articles of Association.
Board remuneration is subject to approval during the AGM of shareholders, based on recommendations from the Board Nomination and Remuneration Committee (BNRC) and the Board itself.

The Executive Management Remuneration System
considers the operational environment, performance results, and the company's risk tolerance. The key components of this system include:

Fixed Remuneration
Fixed remuneration is determined by the level of responsibilities assigned and the specific career path of each executive member. A remuneration index is established for each position, reflecting its value to the company. This index is reviewed annually by the BNRC, in collaboration with relevant departments such as Human Resources, to reassess the total remuneration package, market conditions, and the performance of various divisions. Fixed remuneration encompasses salaries, allowances, benefits, and end-of-service indemnities, all awarded in accordance with the approved salary and grading structure, applicable laws and regulations, and the manual of contractual agreements issued by Human Resources.

Variable Remuneration
Variable remuneration is contingent upon the achievement of predefined goals and is designed to motivate and reward members of executive management. Variable bonuses are allocated based on both individual performance and the overall performance of the company. At Zain, variable remuneration consists of two elements: annual variable remuneration, granted to employees on a yearly basis, and multi-annual variable remuneration, awarded over multiple years to emphasize the Board's focus on short-, medium-, and long-term objectives. The annual objectives include both financial indicators, representing financial targets for the company and its departments, and non-financial indicators, reflecting operational objectives achieved through specific activities and initiatives, such as product launches or strategic investments.

Independent Oversight:
The BNRC oversees the design and implementation of Zain's remuneration policies. It operates independently, ensuring that remuneration aligns with best practices in good governance, shareholder interests, and regulatory requirements. Annually, the BNRC reviews and updates the remuneration policy to reflect changes in the market and internal performance.

Reporting of Stakeholder Votes:
Votes on remuneration policies and proposals are conducted during the AGM, where shareholders are invited to vote on the recommendations made by the BNRC. Results of these votes are disclosed transparently as part of Zain's commitment to good governance and accountability.

Anti-Corruption:

The Board plays a pivotal role in establishing a robust control framework that integrates a comprehensive set of standards, processes, and structures to ensure effective internal controls across the organization. In fulfilling its oversight responsibilities, the Board ensures the implementation of a functional anti-corruption system and continually monitors executive management's performance in executing the associated policies. A key priority is embedding a culture of integrity and ethical conduct throughout the organization, reinforcing the importance of anti-corruption principles as a foundation for responsible business practices.

Aligned with international governance standards, the Board's actions contribute directly to value creation across multiple areas, by safeguarding the company's assets, preserving stakeholder trust, strengthening human capabilities through training, and supporting sustainable long-term performance. Notably, in 2025, Zain incurred zero costs related to corruption fines or penalties, emphasizing the strength of its governance systems and the effectiveness of its internal controls.

The Board maintains open and transparent communication with shareholders and stakeholders, ensuring timely, accurate, and coherent disclosure of essential information. This commitment supports enhanced social and intellectual resources, enabling informed decision-making and reinforcing credibility. Both the Board and executive management remain committed to addressing the company's broader economic, environmental, and social impacts, promoting inclusive growth and long-term sustainable value.

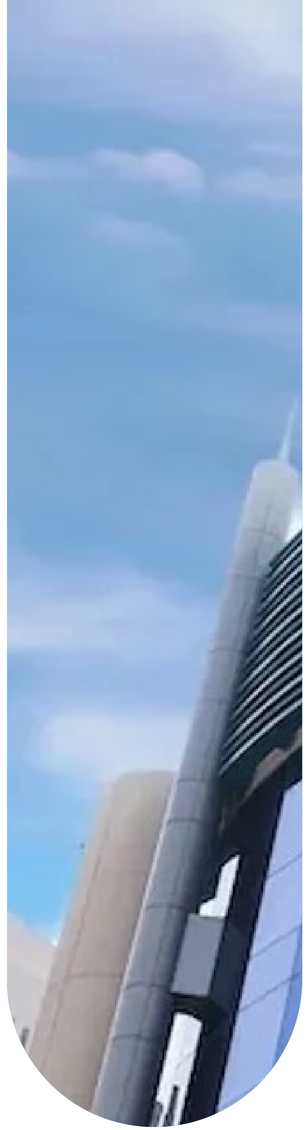
Zain's anti-corruption policies and procedures were communicated to all relevant stakeholders—including Board members, employees, business partners, and suppliers—across all operational markets. The policy is also available publicly on the company's website, ensuring broad accessibility and strengthening social and intellectual aspects through transparency and awareness. Communication was delivered through email notifications and video materials, supported by tracking mechanisms that verify receipt and review. These systems will continue to evolve throughout 2026 to enhance accountability and further develop the organization's human capital.

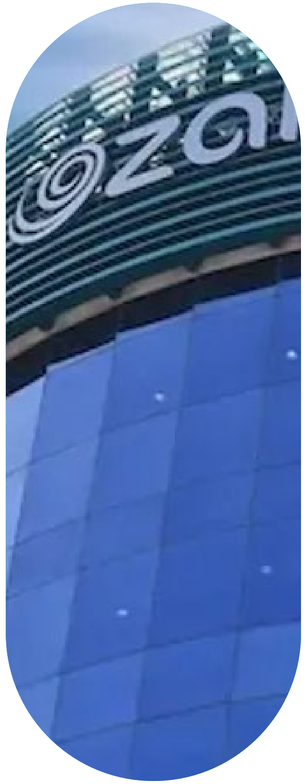
In 2025, the Board held a total of six meetings. Engagements between the Board and the executive management team occur periodically or when required, ensuring continuous oversight across economic, social, environmental, and human rights matters. Delegated authorities reflect the specific responsibilities of senior executives and support effective strategic alignment. This approach reinforces Zain's Corporate Sustainability strategy, which focuses on delivering "Meaningful Connectivity," and driving systemic change.

The Board also meets with Internal Audit, Risk Management, Compliance, Finance and Strategy teams at least quarterly, as mandated by applicable laws and regulations. These interactions ensure comprehensive oversight of internal controls, risk mitigation, and financial performance. The Board retains the discretion to invite any member of executive management to participate in these meetings when necessary, strengthening financial and intellectual resources through informed, data-driven oversight.

Anti-Corruption Policies Communication: All employees across every operating market received communication on anti-corruption policies and procedures through electronic channels and publicly accessible materials. Tracking mechanisms support continuous monitoring of engagement. Policies were also communicated to all business partners, including suppliers and contractors, ensuring alignment with Zain's ethical standards. This broad communication reinforces ethical expectations across the value chain.

Incidents of Corruption: Zain reported zero confirmed incidents of corruption in 2025. No employees were dismissed or disciplined for corruption-related activities, and no contracts with business partners were terminated or not renewed due to corruption violations. Furthermore, no public legal cases were brought against the company or its employees during the reporting period. This strong record protects the company's reputation and minimizes operational and financial risks.







Highlighted in the following table are the main Corporate Governance related topics and their impact across the six different integrated thinking capitals:

MATERIAL TOPIC
Business Ethics and Governance

SUB-TOPIC
Stakeholder engagement

RISK

Weak engagement or inconsistent communication with regulators, shareholders, employees, partners, and communities may reduce trust, increase reputational risk, and weaken alignment with stakeholder expectations.

OPPORTUNITY

Structured engagement strengthens transparency and responsiveness, supports strategic decision-making, and reinforces long-term value creation through stronger relationships and credibility.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

- **Financial Capital**: protects shareholder value and reduces potential losses.
- **Manufactured Capital**: supports strong operations through informed oversight.
- **Human Capital**: strengthens culture and employee trust.
- **Intellectual Capital**: improves decision-making processes and organizational learning.
- **Social and Relationship Capital**: builds confidence with regulators, customers, partners, and society.

MATERIAL TOPIC
Business Ethics and Governance

SUB-TOPIC
Anticorruption

RISK

Corruption or misconduct could lead to legal/regulatory breaches, financial losses, and significant reputational damage.

OPPORTUNITY

Strong ethics, controls, and reporting mechanisms prevent misconduct and demonstrate compliance, enhancing credibility with regulators and stakeholders.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

- **Financial Capital**: mitigates compliance failures and losses.
- **Human Capital**: reinforces ethical culture and safe workplace.
- **Intellectual Capital**: strengthens internal controls and governance framework.
- **Social and Relationship Capital**: enhances trust and credibility with the community and regulators.

MATERIAL TOPIC
Business Ethics and Governance

SUB-TOPIC
Conflict of interest

RISK

Undisclosed or unmanaged conflicts of interest may lead to biased Board and management decisions, compromise integrity, and undermine fairness in transactions (especially with related parties or controlling shareholders).

OPPORTUNITY

Mandatory disclosures, Internal control measures, independent expert reviews for significant transactions (10%+ of assets), and structured investigations strengthen objectivity, transparency, and trust in major decisions.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

- **Financial Capital**: safeguards shareholder value and ensures careful resource allocation.
- **Manufactured Capital**: supports merit-based investment decisions for network and operational advancements.
- **Natural Capital**: prevents decisions that could compromise sustainability goals or natural resources.
- **Human Capital**: strengthens accountability, employee trust, and leadership credibility.
- **Intellectual Capital**: enhances governance processes and decision structures
- **Social and Relationship Capital**: deepens confidence among regulators, customers, partners, and society.

MATERIAL TOPIC
Business Ethics and Governance

SUB-TOPIC
Communication of Critical Concerns to the Board

RISK

Failure to provide safe escalation channels may delay detection of misconduct, governance breaches, or ESG violations, increasing exposure to financial, compliance, operational, environmental, and social risks.

OPPORTUNITY

Secure, confidential reporting channels, immediate escalation pathways, and continuous Board oversight enable timely mitigation and continuous improvement, transforming issues into opportunities to strengthen ethics and trust.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

- **Financial Capital**: protects against losses and reputational damage.
- **Manufactured Capital**: safeguards continuity and reliability of critical services and infrastructure.
- **Natural Capital**: helps identify environmental risks early and manage resources responsibly.
- **Human Capital**: promotes a safe workplace and supports people development.
- **Intellectual Capital**: strengthens governance maturity and internal systems through learning and improvements.
- **Social and Relationship Capital**: builds trust with employees, regulators, partners, and society.

10 Enterprise Risk Management

The security landscape continues to grow in complexity as technology evolves at an unprecedented pace. Recognizing this, Zain remains steadfast in strengthening its ability to anticipate and respond to emerging threats such as ransomware, phishing, and zero-day exploits. Zain's Risk Management Framework is designed to be both proactive and adaptable, ensuring that risks are managed effectively in a constantly shifting environment.

At the heart of this framework lies the Enterprise Risk Management (ERM) department, which plays a pivotal role in identifying, assessing, and prioritizing risks across all operations. By maintaining a forward-looking approach, ERM supports informed strategic decision-making and helps safeguard the organization's resilience. Continuous assessments including the annual review of information security controls ensure that the defenses evolve in line with new and emerging threats.

Oversight of the ERM function is provided by the Board Risk Committee (BRC). The committee reviews and approves the Risk Management Framework annually and monitors key risk trends on a quarterly basis. This process is reinforced through close collaboration with Internal Audit, Corporate Compliance, Corporate Governance, and Group Risk Management, ensuring that risk oversight remains robust and comprehensive.

In parallel, Zain's risk management activities are aligned with the Corporate Sustainability strategy, the ERM team evaluates social, economic, and environmental risks through ongoing research and stakeholder engagement, integrating sustainability considerations into Zain's broader risk outlook. Since 2019, particular emphasis has been placed on understanding the material impact of climate change — identifying both risks and opportunities to enable early mitigation planning across Zain's markets.

Through this integrated and evolving approach, Zain continues to strengthen its capacity to navigate uncertainty and maintain resilience in an increasingly dynamic risk environment.

Climate-Related Risks and Opportunities are explained in depth in the Task Force on Climate-Related Financial Disclosures (TFCD) report on page 120.

Membership Associations from a Risk Perspective

Zain's active participation in global telecommunications organizations underscores its commitment to responsible industry collaboration and continuous improvement in risk management and connectivity standards. As a member of both the GSMA and the International Telecommunication Union (ITU), Zain engages in international initiatives that drive innovation, promote interoperability, and strengthen the security and resilience of communication networks.

Through its GSMA membership, Zain takes part in global industry dialogues such as the Mobile World Congress, where collaboration with peers helps advance shared priorities including roaming, interconnectivity, and cybersecurity. These engagements enable us to remain aligned with emerging industry trends and best practices that support operational and strategic risk management.

Within the ITU, Zain contributes to initiatives focused on developing international standards, managing global radio spectrum resources, and expanding access to information and communication technologies (ICTs), particularly in underserved regions. This involvement reflects Zain's broader commitment to supporting a secure, inclusive, and sustainable digital ecosystem across its markets.





Risk Management Framework

In alignment with our established Risk Management Framework, Zain continues to maintain a consistent and disciplined approach to assessing and managing risks across all operations. As in previous years, this methodology has proven effective in ensuring that security-related events are analyzed systematically and in a manner that supports sound governance and informed decision-making.

Each security event is evaluated using a standardized risk rating process that applies an impact-likelihood matrix across Zain's operations. The assessment considers a comprehensive range of potential impact factors including financial, reputational, market, customer, employee, and climate-related dimensions to provide a balanced and forward-looking view of Zain's risk exposure.

Both inherent and residual risk levels are determined through the evaluation of pre- and post-mitigation conditions. This structured approach enables the company to maintain visibility over the effectiveness of its controls and to monitor changes in its overall risk profile, ensuring continuity, transparency, and accountability in the management of enterprise risks.

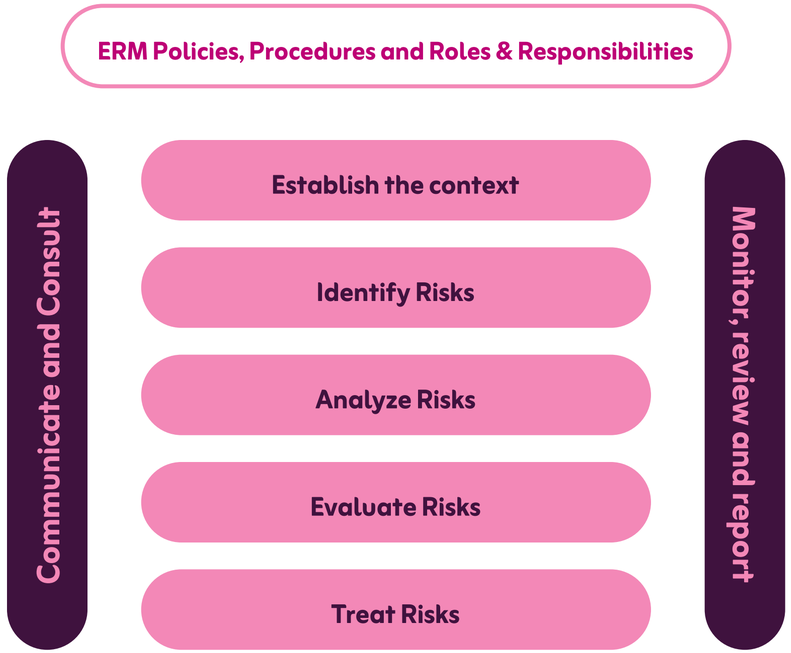


Figure 1: Zain Risk Management Framework (alignment to ISO 31000)



Figure 2: Zain Risk Management Framework (alignment to Committee of Sponsoring Organizations Framework)

Precautionary Principle

Zain applies the precautionary principle across its operations, from the design of products and delivery of services to the implementation of internal security technologies by integrating environmental considerations into every stage of decision-making. Zain remains mindful of the potential impacts of rapid technological advancements, with key risks monitored closely by the Board, the Board Risk Committee (BRC), and the Climate Action Committee.

In line with its sustainability objectives, Zain prioritizes the development and deployment of low-carbon products and services that meet customer needs while supporting environmental responsibility. Climate-related factors such as energy efficiency, heat dissipation, and end-of-life disassembly for repair or reuse are central to the Waste Management Policy Framework and embedded within our product and service design checklist to ensure that sustainability is an integral part of innovation.

Collaboration with suppliers further reinforces this approach. Zain's product design and procurement teams work closely with partners to encourage the creation of solutions with reduced environmental footprints. In the case of internal security technologies, vendor selection criteria include sustainability parameters such as energy consumption and heat management, ensuring that environmental performance contributes to overall evaluation and final decision-making.

Data Protection and Privacy

Zain Group continued to strengthen its data governance maturity through the establishment of the Group Data Office, reinforcing its commitment to responsible, secure, and innovative data management across all markets. The Data Office assumed full ownership of the Group Data Management and Privacy Frameworks, ensuring a unified and future-ready approach aligned with international best practices. Major enhancements to the Group's data privacy policies were approved by the Board, strengthening safeguards for personal data and ensuring full compliance across all Zain entities.

Management Approach to Protecting Personal Data

The Zain Group Data Privacy Framework serves as the Group's unified and binding governance model for managing personal and sensitive data across subsidiaries, affiliates, and operating companies. It outlines clear principles and mandatory controls for how data is collected, used, stored, shared, transferred, retained, and disposed of throughout its lifecycle. The Framework consolidates legal requirements, international standards, and internal governance practices into a single reference applicable to all business functions, technologies, and third parties.

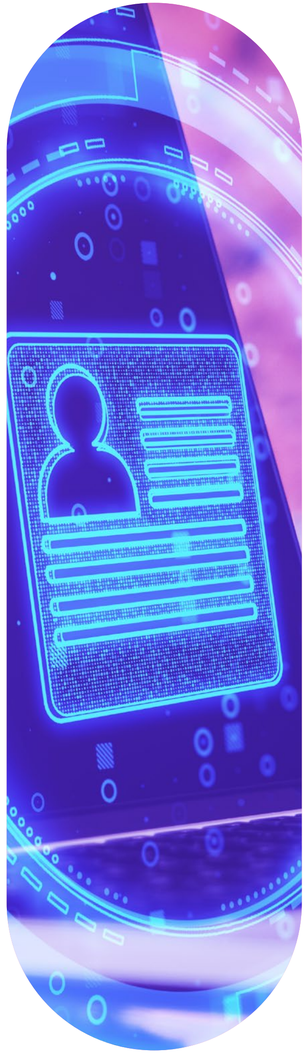
Built around twelve core Domains, the Framework translates the Group's privacy commitments into actionable, measurable, and auditable requirements. Each Domain is structured into Sub-Domains, Executable Controls, and Evidence Deliverables, enabling consistent implementation and verifiable compliance across the Group. As part of this rollout, operating companies and subsidiaries are designating qualified Data Protection Officers, adopting the updated policy, and integrating its controls within their systems and processes. This Group-wide alignment strengthens privacy governance and harmonizes protection practices across all Zain operations.

Through this Framework, Zain embeds privacy into corporate governance, system design, and operational processes, ensuring that digital and technological initiatives including analytics, artificial intelligence, and cloud-based services apply the privacy-by-design principle. This positions data protection as both a regulatory requirement and a strategic enabler of trust, innovation, and sustainable digital transformation.

Zain operates within a rapidly evolving regulatory environment across Kuwait, the GCC, and global jurisdictions. Kuwait continues to advance national privacy and cybersecurity requirements through directives from the National Cyber Security Centre and the Communications and Information Technology Regulatory Authority. Across the GCC, countries including Saudi Arabia, the UAE, Qatar, Bahrain, and Oman have enacted comprehensive data protection and cybersecurity laws. Internationally, regulations such as the EU GDPR, the UK Data Protection Act, and sector-specific standards increasingly shape expectations for accountability, cross-border data transfers, and data subject rights.

To remain agile within this dynamic landscape, the Group Data Privacy Framework embeds continuous regulatory monitoring, compliance alignment, and periodic enhancement. This proactive approach mitigates legal and reputational risks while reinforcing Zain's commitment to maintaining global best practices and delivering secure, transparent, and responsible digital services.





Strategic Blueprint of the Zain Group Data Privacy Policy

The unified Zain's Data Privacy Policy is the Group's formal statement of commitment to protecting the personal data of all individuals who interact with its services across the Middle East and Africa. The Policy establishes the principles, legal bases, governance structures, and operational requirements that apply to the collection, processing, storage, sharing, transfer, retention, and deletion of personal data across all Zain entities, subsidiaries, and digital channels.

The Policy sets out a unified framework for compliance with national data protection laws in all Zain markets, including Kuwait, Saudi Arabia, Jordan, Bahrain, Iraq, Sudan, South Sudan, and the United Arab Emirates. It ensures that Zain processes personal data lawfully, fairly, and transparently, and that data subjects are informed of their rights and the ways in which their information is used.

The Policy outlines the lawful bases under which personal data is processed, and explains the circumstances where consent is required. It provides clear rules for processing children's data, explains the legitimate purposes for which Zain uses customer and employee information, and describes when and how Zain may share or transfer data to third parties or across borders.

Core Policy Pillars

Compilance Framework

Unified framwork for compilance with national data protection laws across Kuwait, Saudi Arabia, Jordan, Bahrain, Iraq, South Sudan, and UAE

Data Categories

Clear definitions of personal and sensitive data categories, lawful processin bases, consent requirements, and special rules for children's data

Governance Model

Comprehensive internal governance led by Data Protection Officers at Group and Entity levels overseeing compliance and risk management

Data Privacy Policy Architecture

Principles

- Lawful processing
- Fair & transparent
- Purpose limitation
- Data minimization

Data Subject Rights

- Access & correction
- Erasure & objection
- Consent withdrawal
- Data portability

Security Safegurads

- Technical controls
- Organizational measures
- Access restrictions
- Encryption standards

DPO Structure

- Group-level DPO
- Entity-level DPOs
- Compliance oversight
- Risk assessment

Retention & Deletion

- Defined retention periods
- Secure deletion of protocols
- Lifecycle management
- Audit trails

Breach Notification

- Mandatory timelines
- Regulator reporting
- Individual notification
- Incident documentation

Collection
Lawful & Transparent Gathering

→ **Processing**
Purpose-limited use

→ **Storage**
Secure retention

→ **Sharing**
Controlled transfer

Data subjects are provided with detailed rights, including access, correction, erasure, objection, and withdrawal of consent. The Policy also outlines Zain's procedures for breach notification, including mandatory timelines for reporting incidents to regulators and affected individuals.

Overall, the Policy functions as the Group's binding rulebook for ethical, transparent, and compliant data handling. It ensures that privacy risks are managed, regulatory obligations are met, and trust is maintained across all operations, services, and jurisdictions in which Zain operates.

Policy Outcomes

Ensuring trust, compliance, and ethical data stewardship

Regulatory Compliance

Full adherence to national data protection laws across all markets

Trust Maintenance

Building and sustaining customer confidence through transparency

Risk Management

Proactive identification and mitigation of privacy risks

Data Exposure and Vulnerability Assessment

During the current year, Zain continued its efforts to strengthen its capabilities for identifying, assessing, and managing personal data exposure risks across all operations. Through coordinated efforts between the Zain Data Office, Group Cybersecurity, and the OPCO data and privacy functions, exposure points were identified earlier and addressed with greater consistency. No major incidents or confirmed data breaches occurred during the reporting period. The exposure points identified represent risk conditions rather than any confirmed loss, misuse, or unauthorized disclosure of personal data.

Telecom operators globally face similar exposure risks due to large volumes of customer data spread across complex systems where older platforms sit alongside newer digital environments. These conditions lead to inconsistent access controls, uneven encryption, manual data handling, and rapid growth of APIs and third-party integrations that demand stronger oversight. Zain Group made these risks a priority within its broader privacy and data governance transformation, introducing a unified Data Privacy Framework and standardized policies to reduce inconsistencies across all operating companies, strengthening access governance, improved retention and disposal practices, clarified accountability for data protection, and tightened oversight of vendors, processors, and high exposure systems.

Zain may process customer information for clearly defined secondary purposes, consistent with the Sustainability Accounting Standards Board definition of secondary use and aligned with the data protection laws in all jurisdictions where Zain operates. Secondary purposes refer to the lawful and proportionate use of customer information beyond the delivery of core telecommunications services. These purposes include service quality enhancement, product and network development, fraud prevention, customer experience improvement, and analytical activities that support operational efficiency and strategic planning.

The newly introduced Group Data Privacy Framework and the aligned privacy policies are currently being rolled out across all Opcos. As this work progresses, these documents will establish a unified structure for purpose limitation, data minimization, and transparency, and will serve as the central reference for how secondary processing is governed. Once fully implemented, the framework and policies will create a more consistent and accountable approach across the Group. Their adoption will allow Zain to demonstrate clearer improvement in the next reporting cycle, supported by measurable indicators and aligned practices across all markets.

Zain currently applies the principle of collecting and using only the minimum amount of information required for service improvement, analytics, or product development, and uses anonymization or pseudonymization techniques wherever feasible to reduce the risk of re-identification. As the framework becomes fully operational, adherence to these requirements will be monitored in a more structured and comparable manner across Opcos, enabling the Group to validate progress and identify areas requiring further enhancement.

Secondary processing related to analytics, research, or new service development continues to take place within controlled environments. These environments follow safeguards such as access restrictions, encryption, comprehensive logging, and oversight by the Zain Data Office and the designated Entities data protection officers. As the new framework and unified policies are embedded, future assessments will reflect stronger privacy governance, more consistent implementation across markets, and clearer evidence of improvement in the responsible management of customer information.

Data Security

Zain remains steadfast in its commitment to strengthening the security of its operations through the continuous adoption of advanced technologies and the enhancement of its overall security posture. As part of this ongoing effort, regular assessments are conducted to identify potential vulnerabilities and validate the effectiveness of existing controls, ensuring that its defenses remain resilient against evolving threats.

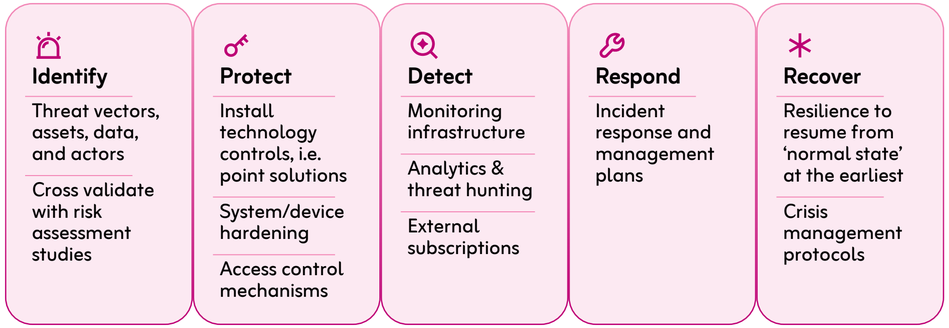
Management approach to identifying and addressing data security risks

Zain continues to adopt a proactive and comprehensive approach to managing data security risks in response to the evolving threat landscape. Building upon established security policies and procedures, Zain conducts regular risk assessments and implements robust data protection controls to safeguard the confidentiality, integrity, and availability of information across its operations.

Given the sensitivity of the data stored and processed, periodic evaluations are carried out to identify vulnerabilities, emerging risks, and evolving attack vectors. Each year, the scope of these assessments is expanded to encompass new technologies, processes, and operational areas, ensuring comprehensive coverage of Zain's evolving digital landscape. This ongoing assessment ensures that Zain's defenses remain up to date and aligned with industry best practices.

Zain employs a defense-in-depth strategy designed to establish multiple layers of protection against unauthorized access and potential data breaches. This includes a combination of preventive, detective, and responsive security controls that safeguard information assets across all operations. Continuous monitoring and incident response mechanisms further enhance preparedness and ensure rapid action in the event of a security incident.

The following is an illustration of a framework referenced in Zain's cyber resilience strategy.



Below are some initiatives undertaken by Zain across the operations.

- Vulnerability assessments
- Penetration testing
- Telecom signaling security assessment
- Regular security awareness on relevant topics
- Incident and breach handling and notification to related authorities
- ISO 27001 Information Security Management System certification
- New security solutions implemented and enhancements to existing solutions

Managing Systemic Risks from Technology Disruptions

Mission-critical services demand uninterrupted availability, as any downtime is unacceptable and can lead to immediate and severe consequences. Zain actively monitors its key systems to detect and address any disruptions.

Zain Bahrain

System	Availability
Core	100%
Charging	100%
Website	100%

Zain Iraq

System	Availability
Core	100%
Charging	100%
Website	100%

Zain Jordan

System	Availability
Core	99.67%
Charging	100%
Website	99.63%

Zain Kuwait

System	Availability
Core	100%
Charging	100%
Website	100%

Zain Saudi Arabia

System	Availability
Core	100%
Charging	100%
Website	100%

Zain Sudan

System	Availability
Core	100%
Charging	100%
Website	100%

Zain South Sudan

System	Availability
Core	100%
Charging	100%
Website	100%

Zain Group

System	Availability
ERP	100%
Oracle Hyperion	100%
Zain Group Website	100%

Description of systems to provide unimpeded service during service disruptions

Core - Includes PS Core and CS Core (previously mentioned in prior Zain's Sustainability Reports).

CS Core: Circuit Switch, handling voice calls and containing functionalities such as mobile switching Center (MSC) and gateway MSC (GMSC).

PS Core: Packet Switch, handling data sessions and containing functionalities such as Serving GPRS support node (SGSN), gateway GPRS support node (GGSN), domain name server (DNS), dynamic host configuration protocol (DHCP) server, packet charging gateway, etc.

Charging - System for customers to recharge their accounts with credit and maintain balance information. Used by prepaid and postpaid customers.



Security Risk Training

Since its launch in 2020, Zain's *PAUSE.THINK.ACT* Cybersecurity Awareness Program has continued to strengthen employees' ability to recognize, prevent, and respond to potential security threats. The program equips all Zainers with the knowledge needed to identify phishing attempts, apply secure digital practices, and understand their critical role in safeguarding the company's information assets.

Awareness is promoted through a variety of engagement channels, including email campaigns, SMS alerts, in-person and virtual training sessions, onboarding programs, and awareness workshops conducted across operations. By embedding cybersecurity awareness into the organizational culture, Zain reinforces a shared sense of responsibility and accountability, thereby reducing risk exposure and further enhancing the company's overall security posture.

Information security topics covered in 2025

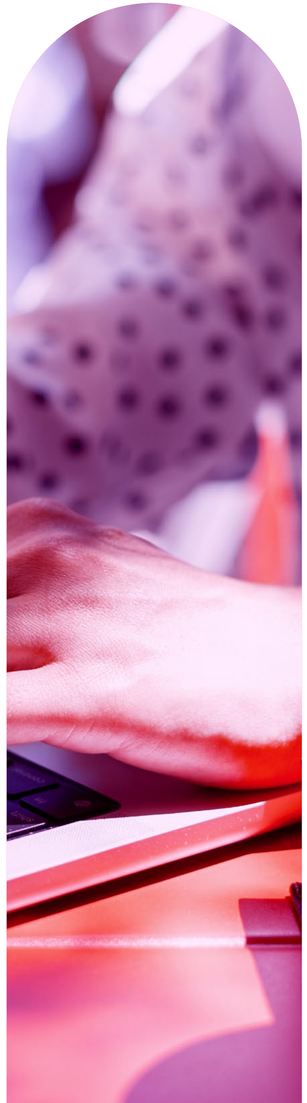
- Phishing Emails
- Physical Security
- Social Media Best Practices
- Safe Remote Work Practices
- Email Security Best Practices
- Ransomware Threat

2025 Awareness Updates	Kuwait	Saudi Arabia	Bahrain	Iraq	Jordan	Sudan	South Sudan
Total Staff	1,638	1792	578	1903	1284	793	155
Total Number of Staff that received awareness content	1,638	1792	578	1903	1284	793	155
Total number of channels utilized	5	3	4	2	4	2	5
Channels utilized	Emails Induction Workshop SMS	Workshops Awareness Campaign Emails SMS	Learning Platform Emails Workshops In-Person Session Digital Learning	Emails Instagram	Emails Social Media Digital Screens Workshops Gamification	Corporate Email Newsletter Social Media	Emails Workshops

The following list consists of the cyber security training courses undertaken by Enterprise Risk Management employees across Zain's operations.

- SEC401: SANS Security Essentials – Network, Endpoint, and Cloud
- Decoding MITRE D3FEND for Building Strategy for Cyber Resilience
- COMPTIA Security+
- Network XDR Training
- Defcon Security Testing & Defense
- National Cybersecurity Crisis Management

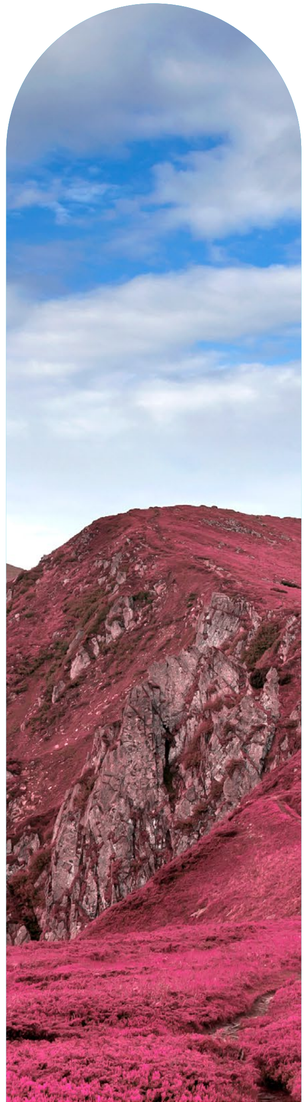






Initiatives with External Stakeholders

Initiative	Date of Adoption	Opcos in Scope	Nature of Initiative (Binding/Voluntary)	Range of Stakeholders Involved
Information Security Management System ISO 2700	10-Jan-24	Zain Bahrain	Binding	Telecommunication Regulatory Authority
	22-Nov-23	Zain Iraq	Voluntary	AQC
	02-Feb-24	Zain Kuwait	Voluntary	DNV-GL
	21-Jun-23	Zain Jordan	Voluntary	SGS
	30-Aug-23	Zain KSA	Voluntary	Intertek
Business Continuity Management System ISO 22301	29-Jan-23	Zain Kuwait	Voluntary	DNV-GL
	13-Jan-2025	Zain Iraq	Voluntary	AQC
	01-Apr-24	Zain Jordan	Voluntary	SGS
	30-Aug-23	Zain KSA	Voluntary	Intertek
Quality Management System ISO 9001:2015	29-Jul-2024	Zain Bahrain	Voluntary	DNV-GL
	03-Feb-2024	Zain Kuwait	Voluntary	DNV
Environmental Management System ISO 14001:2015	03-Feb-2024	Zain Kuwait	Voluntary	DNV
IT Service Management System ISO 20000-1	31-Jan-23	Zain Kuwait	Voluntary	DNV



Sustainability Risks Impacting Risk Management

Physical risks: Increase in energy costs due to additional cooling caused by temperature increases

Each Zain operation monitors the pattern of fuel and electricity consumption and reports to the Group on a quarterly basis. Fuel and electricity consumption patterns are analyzed to assess variations.

In case energy consumption increases more than 10% quarter-on-quarter, the concerned opcos are required to provide details and justifications for such changes. We took the reference of Coupled Model Intercomparison Project, Phase 6 (CMIP6) models included in the IPCC's Sixth Assessment Report (AR6).

Global warming of 1.5C relative to 1850–1900 would be exceeded during the 21st Century under the intermediate, high, and very high greenhouse gas (GHG) emissions scenarios considered in this report (SSP2-4.5, SSP3-7.0 and SSP5-8.5, respectively).

For our analysis, we selected the following SSP scenarios: SSP1 2.6 2039: Kuwait (1.012), KSA (1), Bahrain (0.971), Iraq (1.113), Jordan (1.086), Sudan (0.863) and South Sudan (0.702).

SSP5 8.5 2039 and 2059: Kuwait (1.2222.492), Saudi Arabia (1.18, 2.453), Bahrain (1.158, 2.244), Iraq (1.302, 2.538), Jordan (1.258, 2.362), Sudan (0.923, 2.047), South Sudan (0.688, 1.643).

SSP2 4.5 2039 and 2050: Kuwait (1.018, 1.813), Saudi Arabia (1.035, 1.8), Bahrain (0.979, 1.688), Iraq (1.11, 1.854), Jordan (1.082, 1.731), Sudan (0.858, 1.496), South Sudan (0.628, 1.268).

The timeframes mentioned are the ones covering our net-zero timeline, but our analysis went beyond 2050 to provide an understanding of the extent to which our business could be impacted in the long-run.

Transition Risk: Increases in energy tariffs will lead to an increase of energy costs for the operation of our telecom/IT sites

During the assessment of climate-related risks for our core site, offices, and base station facilities, we identified that there could be an increase in operational expenditure due to fuel tariff hikes and grid power units in our

areas of operation.

Zain's total energy consumption in 2025 was **128.4M Liters** and **1,240.39 GWh** across seven operations. The 2025 overall energy cost was **USD 195.3m** from the 2024 overall energy cost which was based at **USD 155.26M**. Overall energy costs including diesel in 2025 was **USD 195.34M**. With Zain's long-term planning process of 14 years, it estimates that energy operating costs could **increase by over 60% to USD 314.57M in 2039**. Overall energy costs including diesel in 2025 was USD 149.07 M. With Zain's long-term planning process of 14 years, it estimates that energy operating costs could increase by over 60% to USD 249 million in 2039.

Opportunities

The availability of a reliable universal grid supply is essential for economic growth and the alleviation of poverty. While the South Sudanese government's desire to modernize and extend on-grid coverage and introduce additional generation capacity is commendable, until such time when a stable political and conflict-free environment exists in the country, the current challenging state of the nation's main utility supply is likely to persist for the foreseeable future.

Zain implemented a range of green energy solutions, including battery-hybrid systems, solar installations, outdoor equipment modernization, grid connections for base station sites, and site-sharing arrangements with other mobile network operators. Zain's strategic approach focuses on converting identified physical and transition risks into opportunities by adopting solutions that reduce operating costs while ensuring payback periods do not exceed six years. The deployment of 140 outdoor cabinets featuring substantially higher energy efficiency compared to traditional telecom shelters incurred a total opex savings of **USD 1.21m**. Collectively, these initiatives resulted in a reduction of **806 metric tons of CO_2 emissions**, with additional emission reductions expected to continue for at least the next five years, aligned with the operational lifetime of the installed equipment. While the opportunity extends across Zain's wider operations, Iraq, Sudan, and South Sudan represent the primary beneficiaries due to their grid availability constraints and the elevated cost of diesel driven by local currency devaluation.

The opportunity also refers to Zain's broader operations. We highlighted Iraq, Sudan, and South Sudan as these opcos are the major beneficiaries of this opportunity due to grid availability and cost of diesel in the face of devaluation of the local currencies.

To mitigate the increase in energy consumption associated with heightened cooling requirements, Zain implemented a series of initiatives under its strategic pillar of operational effectiveness.In 2025:

- 41 infrastructure sharing sites for a cost of USD 184,900
- The deployment of 140 outdoor sites in Bahrain for a cost of USD 1,531,188
- Installation of 81 inverter-based cooling systems in Kuwait for USD 115,830
- The deployment of smaller size diesel generators in Kuwait for USD 61,201
- The installation of 218 DG hybrid solutions in Iraq and Saudi Arabia for USD 3,775,000
- The installation of additional 433 DG-Battery Hybrid solutions Bahrain, Iraq, and Saudi Arabia through our TowerCo Partners.
- Implemented 158 solar hybrid solutions in Iraq, Saudi Arabia, and South Sudan for USD 2,725,000
- Connected 330 sites to the grid in all operations, except Iraq, for USD 710,812

Risk Management Value Creation from Climate Change Perspective

Zain's Risk Management practices have a positive impact and creates value in the below mentioned areas:

Business: Long-Term (5+ years)

Information security assessments, strict risk management policies, and robust security solutions enhance Zain's business operations by safeguarding critical data, ensuring compliance, and minimizing disruptions. These proactive measures build trust with stakeholders, protect intellectual property, and support seamless operations, driving business continuity and growth. Additionally, by preventing breaches and mitigating risks from threat actors, Zain avoids costly incidents, legal penalties, and downtime, achieving cost optimization through reduced financial losses and efficient resource allocation. This is a long-term impact as security threats will continue to exist and evolve, meaning Zain's security posture will continue to mature.

Society: Long-Term (5+ years)

Zain's Risk Management practices create societal value by promoting a safer digital environment through comprehensive information security assessments, well-defined policies, and robust procedures. These efforts not only protect the company's data but also contribute to safeguarding customers' information, fostering trust and reliability. Through security awareness programs and sessions, Zain empowers employees and stakeholders with the knowledge to mitigate risks, reducing the impact of cyber threats beyond the organization. This proactive approach helps build a more secure community, encouraging responsible digital behavior and supporting overall societal resilience against cybercrime.

Environment: Zain's Risk Management practices take a short-term, medium-term and long-term approach.

Short-Term – (1-3 years)

We analyze the operational risks arising due to climate change events that need to be addressed to enhance our services to remain competitive in our markets. The normal lifetime of some of our assets such as diesel generators used on off-grid sites is approximately three years. Hence, we consider three years to be a reasonable period for assessing the impact of physical risks on such assets. From a financial and strategic perspective, our short-term horizon is focused on development and achievement of revenue forecasts, cost targets and profitability targets based on existing consumer and enterprise business portfolios.

Medium-Term – (3-5 years)

Our medium-term time horizon is aligned to our business planning process that uses a five-year horizon for the operational risks arising due to climate change events. This period is also in line with the lifetime of other assets such as deep cycling batteries, which are used to mitigate the factors associated with some of the physical and transition risks. Our five-year business plan is updated annually, while monitoring the progress of the plan from the previous year. The business plan is updated with actuals of the first year and the revised forecast for four years, and subsequently an incremental year is added.

Long-Term – (5+ years)

Our long-term business financial planning process is planned over 5 and 15 years to align with our goals for climate change initiatives. This is the timeframe that gathers a large portion of the company's assets such as the cooling systems, DC power systems, the radio systems, and other active equipment in transmission and core sections. The impact of physical risks on such assets is evaluated and mitigated to ensure that the company remains competitive in its markets of operation. From a strategic perspective, our strategic business plan entails the long-term horizon and is focused on a forecast of cashflows and revenue potential from the initiatives that we identify as part of our organization's strategy.





The following table demonstrates the company's risks and opportunities in relation to the six integrated thinking capitals. It provides insights on such topics are impacting the business holistically.

MATERIAL TOPIC
Business Model, Resilience and Physical and Sociopolitical Risks

SUB-TOPIC
Risk Management

RISK
Inability to anticipate emerging threats, fragmented controls, operational disruptions, and inconsistent risk governance.

OPPORTUNITY
Strengthening enterprise-wide risk management improves resilience, supports informed decisions, and ensures continuity across operations.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Strengthened risk management enhances intellectual, human, and social capital by improving preparedness, decision-making, and stakeholder confidence. However, it requires upfront investments that place short-term pressure on financial capital.

- Intellectual Capital
- Human Capital
- Social & Relationship Capital
- Financial Capital

MATERIAL TOPIC
Customer Privacy & Data Security

SUB-TOPIC
Data Protection & Privacy

RISK
Data exposure from legacy systems, inconsistent access controls, non-compliance with privacy laws, and weaknesses in data handling.

OPPORTUNITY
Unified Group Data Privacy Framework enhances trust, transparency, and regulatory compliance across all markets.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Effective data privacy governance increases social and relationship capital by building trust and strengthening human and intellectual capital through better practices and accountability. These improvements, however, come with additional compliance and system-upgrade costs that impact financial capital.

- Social & Relationship Capital
- Human Capital
- Intellectual Capital
- Financial Capital

MATERIAL TOPIC
Customer Privacy & Data Security

SUB-TOPIC
Data Security

RISK
Cyberattacks, ransomware, API vulnerabilities, weak monitoring, and risks from third-party systems.

OPPORTUNITY
Continuous monitoring and stronger cyber controls strengthen security posture.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Robust cybersecurity measures enhance intellectual and manufactured capital by reinforcing system resilience and technical capability, while also boosting social capital through greater customer confidence. The required technology and training investments, however, reduce financial capital in the short term.

- Intellectual Capital
- Social & Relationship Capital
- Manufactured Capital
- Financial Capital

MATERIAL TOPIC
Natural Capital, Climate Change, and Biodiversity and Nature Impacts

SUB-TOPIC
Climate-Related Risk

RISK
Physical risks (heat, storms), rising cooling demand, grid instability, fuel price volatility, and increased Opex.

OPPORTUNITY
Energy-efficient systems, solar/battery solutions, grid upgrades, and site-sharing reduce long-term Opex and emissions.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Actions to mitigate climate-related risks strengthen natural and manufactured capital by improving energy efficiency and infrastructure resilience and elevate intellectual capital through improved climate scenario planning. Nonetheless, these initiatives require initial capital outlays that affect financial performance.

- Natural Capital
- Intellectual Capital
- Manufactured Capital
- Financial Capital



11 Human Rights



Access to human rights is fundamental for any society to grow and develop. Ensuring the inclusive aspect of human rights requires comprehensive due diligence and Zain advocates for human rights through its various products and services.

To ensure the company is playing its part in advancing human rights in an equitable manner, it recognizes that there are certain aspects that need to be set in place:

1. Human Rights policies that guide and sets out the company's role and responsibilities, and actions to uphold human rights in its markets of operation.
2. Comprehensive due diligence process to identify salient human rights.
3. Establish a robust stakeholder engagement process.

Pivot processes based on feedback received from impacted stakeholder groups to ensure value is being created.

The framework set in place below provides the structure of how Zain manages its human rights across its operating markets:

- Governance and Policy
- Our Approach
- Identification of Salient Human Rights Topics through Engagement
- Reporting and Impact

Governance and Policy

The following policies ensure proper compliance and define clear expectations of the company's stance on human rights, applicable to all its stakeholders:

- Human Rights Policy Statement
- Corporate Sustainability Policy
- Code of Conduct
- Supplier Code of Conduct
- Climate Change Policy
- Data Protection and Privacy Policy

All the company's policies are publicly available on its website in English and Arabic.

Based on a comprehensive stakeholder engagement process, Zain revised its Data Protection and Privacy Policy to ensure full alignment to best practices and takes into consideration the materiality of this topic through a dedicated data office division at the Group level.

The company is currently in the process of revising its Corporate Sustainability Policy and Supplier Code of Conduct to be in line with Zain's revised Sustainability strategy as the current strategy will end in 2025.

Our Approach

Zain's due diligence process for human rights covers the following operations - Kuwait, Bahrain, Iraq, Jordan, Saudi Arabia, Sudan, South Sudan in addition to ZainTECH, Zain Omantel (ZOI), and companies under Zain's management control.

Assessing Zain's operating context, comprehensive stakeholder engagement, community deficits, industry trends, benchmarking, and Sustainable Development Goals (SDGs), the following human rights topics have been identified as most salient for the company:

Salient Human Rights Identified	Impact Across Value Chain
Labor rights, treatment and safety	Supply Chain
Public Safety	Supply Chain and Community
Customers' Right to Privacy	Community and Vulnerable Segments
Children's Rights	Community and Vulnerable Segments
Digital Inclusion	Community, Vulnerable Segments, Employees, and Supply Chain
Freedom of Association	Employees, and supply chain

Identification of salient human rights topics through engagement

The following is the process used to identify human rights topics salient to Zain:

1. Conduct Human-Rights Impact Assessment

Comprehensive stakeholder engagement through materiality assessment process, and leveraging communication channels

Insights from industry associations, benchmarking studies, industry analysts, and ESG indices

2. Executive-Level Oversight and Internal Dialog

Held high-level discussions with executive management to ensure human rights considerations are integrated in the decision-making process

3. Public Engagement and Awareness

Zain's social media channels used to engage with key issues such as children's rights, data privacy awareness, and inclusion of vulnerable groups (example: people with disabilities)

4. Stakeholder Education and Training

Launched in 2023, this initiative expanded the number of suppliers who viewed Zain's human rights videos, which are publicly available on Zain Group's website. Building on this foundation, in 2025 Zain introduced a Group-wide human rights awareness training video for all employees, aimed at strengthening understanding of its human rights commitments, reinforcing expected standards of conduct, and ensuring consistent alignment with its policies and international best practices across all operations

5. Strengthening Grievance Mechanisms

Maintained and promoted grievance channels across the Human Rights Policy Statement, Code of Conduct, Supplier Code of Conduct, and Environmental and Social Management Plan (ESMP)

6. Responsible Marketing Standards

Continue to monitor the implementation of Zain's Responsible Marketing Standards across the company's operations and subsidiaries. This year, there are no reported incidents of non-compliance to the standards



Impact and Reporting

Throughout the year, the company continued to evolve its Supply Chain Management process by ensuring adherence to stakeholder concerns and working collaboratively with suppliers to align with Zain's standards and requirements. As a result of the self-assessment questionnaires and physical audits conducted across Zain's operations, there were no human rights violations raised.

Based on Zain's materiality assessment, this year the company added two additional human rights topics: Freedom of association, and adhering/ alignment to universal best practice.

Labor Rights

Stakeholder Engagement

Zain's policies set guidelines to ensure workers' rights are protected across the board. The following policies can be found on the company website:

- Code of Conduct
- Supplier Code of Conduct
- Human Rights Policy Statement
- Life at Zain
- Responsible Marketing & Communication Standard
- Human Resources Policy (available internally for employees only)

Zain's policies continue to evolve and are updated when required based on a comprehensive stakeholder engagement process as well as best practice methodology. The company continues to prioritize mental health for its employees, contributing to the human and social capital by continuing to partner with Kuwait Counseling Center to provide therapy sessions at no charge to support Zain employees through challenging times.

Policies Impact

Zain offers multiple channels for employees to report potential labor rights violations or cases of mistreatment, ensuring that any policy or procedural updates are clearly communicated internally. The company continuously monitors incidents of discrimination across its operations and takes corrective action whenever necessary. Employees, suppliers, business partners, and contractors are encouraged to report concerns through Zain's whistleblowing channel at whistleblowing@zain.com.

Public Safety

Stakeholder Engagement

Zain ensures that all its operations, including the installation of base stations, adhere to its Environmental and Social Management Plan (ESMP) Guidelines and comply with relevant regulatory requirements. These guidelines are designed to reduce potential environmental impacts, safeguard surrounding communities, strengthen the social and relationship capital, and addressing any potential negative effects from the company's activities. The ESMP processes include assessing environmental and social risks, notifying local communities ahead of installation or maintenance work, and implementing policies to address community grievances. Zain also conducts regular equipment testing to maintain compliance with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) standards for occupational and public exposure to electric and magnetic fields, which may impact financial capital negatively in the short-term. However, this initiative is meant to ensure public safety through restricted access and clear signage in antenna propagation zones that exceed ICNIRP's public limits.

Policies Impact

Zain upholds the processes outlined in its ESMP Guidelines to protect against exposure to electromagnetic fields (EMF), radiation, and other potential hazards, ensuring these guidelines remain aligned with the company's net zero goals and biodiversity commitments.

Customer Rights to Privacy

Stakeholder Engagement

In alignment with Zain's 4WARD corporate strategy, the company's Data Office, established in 2024 at the Group level, continued to set stringent processes to place greater emphasis on data privacy and information security across all areas of the business. During the year, the data office held a Group-wide Data and AI workshop in Jordan to ensure the department's acceleration with a clear focus.

Additionally, Zain's Data Protection and Privacy Policy was revised to ensure alignment to best practices. The changes made include the specific definition and scope of personal vs. sensitive data, strengthening the governance model by including functions such as Data Protection Office, Risk, Governance and Internal Audit to track compliance of the policy and includes specific disciplinary measures for breach and non-compliance of the policy. Zain's annual PAUSE. THINK.ACT awareness campaign continued, where frequent awareness notifications are shared to all employees. Additional details are provided in Zain's Risk Management section on page 39. Though the training and system updates increase costs and impact financial capital in a negative manner, it strengthens the company's protection and privacy, leading to sustainable returns.

Policies Impact

Zain's updated and revised Data Privacy policy can be found on the company's Group website here.

If there are any questions or concerns regarding the policy, please contact the below: ZainDataProtectionandPrivacy@zain.com.

Digital Inclusion

Stakeholder Engagement

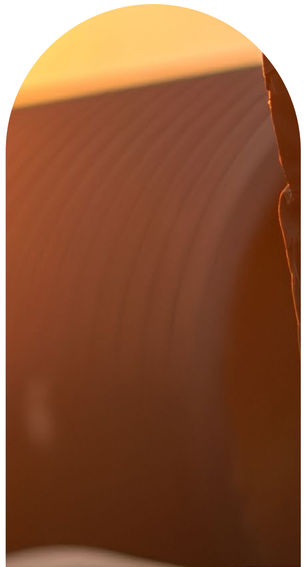
Zain's Inclusion, Diversity and Equity department drives a set of dedicated pillars, including the WE gender diversity initiative, WE ABLE disability-inclusive program, ZY youth development program, BE WELL mental-health program, and REACH mentoring initiative. Through these pillars, Zain integrates digital skills development across the organization. Externally, a dedicated pillar within the Corporate Sustainability strategy focuses on addressing the digital divide, with targeted initiatives aimed at closing access gaps for women, the elderly, and people with disabilities. Accessing new and untapped markets through innovative approaches positively enhances the company's financial, intellectual, and social and relationship capitals.

- Zain's Diversity, Equity, and Inclusion Policy
- Zain's Corporate Sustainability Policy

Policies Impact

Zain's IDE achievements are highlighted in the 'People & Purpose' section of this report, and shared through quarterly updates on the Zain Group website. Details on the progress of specific initiatives under the Corporate Sustainability strategy are available in the 'Sustainability Agenda' section on page 95.





Children's Rights

Stakeholder Engagement

Zain's Human Rights Policy Statement, Data Protection and Privacy Policy, and the recently introduced Responsible Marketing Standard safeguard children's rights and online safety, including the responsible handling of their information, strengthening the company's social and relationship capital. One of the key pillars of the company's Corporate Sustainability strategy is dedicated to youth, with a focus on Child Online Safety, Digital Literacy, and Youth Unemployment. Throughout the year, the company continued to be a member of the newly revamped GSMA Mobile Alliance against Digital Child Sexual Exploitation initiative where members came together to discuss safeguarding and protecting child-related data, age consent, and digital wellbeing.

Impact on Policies

Further information on Zain's progress toward achieving the targets in this area can be found in the 'Sustainability Agenda' section on page 116.

Freedom of Association

Stakeholder Engagement

Zain respects employees' right to freedom of association and collective bargaining in accordance with national labor laws. Respecting freedom of association strengthens human and social capital, though it may require additional engagement efforts and related communication costs.

Policies Impact

Under Zain's Supplier Code of Conduct, the company explicitly states that its third-party employees have the right to join trade entities and are not hindered to do so, and have access to their rights for collective bargaining.



The table below maps out Zain's top salient human rights topics across the six integrated thinking capitals. This demonstrates how human rights are embedded across various aspects of business.

MATERIAL TOPIC
Labor Practice

SUB-TOPIC
Labor Rights, Treatment and Safety

RISK
Poor working conditions or safety incidents, which can lead to legal liabilities, increased insurance fees, and reputational harm.

OPPORTUNITY
Stringent practices to ensure worker safety, which impacts retention rates, absenteeism, and productivity.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Strong labor practices create value by enhancing human and social capital through improved well-being. However, they may involve short-term trade-offs on the financial capital such as higher compliance costs and temporary productivity losses.



MATERIAL TOPIC
Mobile Communications and Health

SUB-TOPIC
Public Safety

RISK
The impact of mismanaged EMF radiation concerns or tower-site accidents on regulatory and legal issues.

OPPORTUNITY
Transparent communication on towers and sites' impact on EMF radiation builds community trust.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Transparent management of mobile tower safety and EMF concerns strengthens social and relationship capital by building public trust and reducing regulatory risks. This approach, however, can require additional financial and operational resources for monitoring and compliance.



MATERIAL TOPIC
Customer Privacy and Data Security

SUB-TOPIC
Customers' Right to Privacy

RISK
Data breaches or misuse of personal data may result in fines, customer loss, loss of trust, or reputational damage.

OPPORTUNITY
Stringent practices to ensure worker safety, which impacts retention rates, absenteeism, and productivity.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Robust data privacy and cybersecurity practices enhance social and relationship capital by strengthening customer trust and protecting reputation, while also safeguarding financial capital through regulatory compliance. Maintaining this impacts financial capital in a negative way (short-term) as it requires continuous investments in systems and training.



MATERIAL TOPIC
Children's Rights

SUB-TOPIC
Children's Rights

RISK
Inadequate safeguards expose children to risks such as exploitation, harmful content, cyber bullying, and privacy breaches.

OPPORTUNITY
Ensure children can reap the benefits of accessing the online space in a productive manner, providing an avenue to other areas such as education.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Protecting children's rights online enhances social and relationship capital by fostering trust and enabling equitable access to education and digital opportunities. However, it may require additional financial and intellectual capital to implement safety measures, monitoring systems, and awareness programs.



MATERIAL TOPIC
Digital Inclusion

SUB-TOPIC
Digital Inclusion

RISK
Limited access for marginalized groups hinders the ability to achieve digital transformation in an inclusive manner.

OPPORTUNITY
Being inclusive in the approach to digital transformation can provide access to new markets and boost innovation.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Promoting digital inclusion strengthens social and relationship capital by fostering equity and expands financial and intellectual capital through access to new markets. Achieving this inclusiveness, however, may temporarily impact financial capital due to the upfront costs of infrastructure and capacity building.



MATERIAL TOPIC
Human Rights

SUB-TOPIC
Upholding International Best Practices

RISK
Gaps in due diligence on human rights risks in operations or supply chains can lead to legal and reputational risks.

OPPORTUNITY
Upholding best practices can ensure the company continues to evolve and improve the way it approaches human rights, which can lead to minimizing violations.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Upholding human rights strengthens social and relationship capital by enhancing trust and reputation. Advancing these standards can require additional financial and operational commitments for due diligence, monitoring, and remediation.



MATERIAL TOPIC
Human Rights

SUB-TOPIC
Freedom of Association

RISK
Restricting employees' rights to collective bargaining can impact retention and productivity rates.

OPPORTUNITY
Respecting freedom of association fosters collaboration, compliance, and a healthy culture.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Respecting freedom of association enhances human and social capital by fostering a productive and positive workplace culture. At the same time, it may require operational flexibility and engagement efforts that can increase short-term communications costs.





12 Materiality Assessment

In 2025, Zain continued to conduct its annual materiality assessment to identify and prioritize the sustainability topics, risks, and opportunities most relevant to the company and its stakeholders. This process ensures Zain remains focused on the issues that stakeholders value most, while also guiding strategic action across the business. Throughout the year, Zain engaged a broad range of internal and external stakeholders to better understand their expectations and address emerging needs.

Building on the enhancements introduced in 2024, Zain continued applying the double materiality framework in 2025. This approach enables the company to evaluate both how sustainability matters may impact Zain's financial performance (financial materiality) and how Zain's operations affect society and the environment (impact materiality). By taking this dual perspective, the assessment strengthens risk management, supports informed decision-making, and provides a more complete view of how Zain creates, preserves, and potentially erodes value.Determining Materiality to Zain

Understanding Zain's Context

Zain continuously reviews and identifies its sustainability priorities through an ongoing assessment of its operations, business relationships, evolving sustainability landscape, and stakeholder expectations. This comprehensive approach ensures the company captures both financial and non-financial impacts across its footprint.

By integrating the strategic objectives of its '4WARD-Progress with Purpose' strategy, its industry focus, and the demographic realities of its workforce, Zain develops a clearer understanding of its Group-wide influence and areas of value creation.

- **Business relationships:** Zain maintains partnerships that align with its strategic direction and values. Across the value chain, the company places strong emphasis on supplier engagement to mitigate risks, strengthen resilience, and safeguard business continuity.
- **Sustainability context:** Operating across a diverse region, Zain faces several pressing sustainability challenges, including youth unemployment, gender inequality, climate-related risks, human rights concerns, biodiversity loss, limited regulatory progress on data security and data sovereignty, gaps in children's rights protections, socio-political instability, skills mismatches, and the ongoing challenge of retaining local talent.
- **Stakeholder groups:** Proactive engagement with stakeholders remains critical to understanding their expectations, concerns, and the value Zain generates from socio-economic, environmental, and human rights perspectives. This engagement enables the company to refine its priorities and ensure its initiatives address the needs of its stakeholders.

Changes in 2025

In 2025, Zain revised the definitions of its materiality assessment topics to ensure greater clarity and consistency across the Group. All topic definitions within the survey were updated to provide clear explanations, making them easier for all users to understand and interpret accurately. In addition, the title Ecological Impacts was changed to Nature and Biodiversity Impacts to enhance clarity, better reflect the scope of Zain's environmental focus areas, and align with global sustainability frameworks.

Zain enhanced the scope of its materiality assessment by expanding participation to include employees across the Group, ensuring a more representative and comprehensive perspective. Previously, the assessment was conducted primarily for Zain Group employees; this updated approach allowed for a more diverse input from employees across its markets, strengthening the accuracy and inclusiveness of the results.

1. Identifying Actual and Potential Value Created

In 2025, Zain continued to utilize Datamaran, a software analytics platform that conducts its materiality assessment by monitoring current and emerging Environmental, Social and Governance (ESG)-related risks. The automated analysis includes benchmarking against peers, evaluating broader ESG regulations, online news, and media sources, alongside gathering insights from stakeholder engagement surveys.

Zain utilizes Datamaran's platform analytics and incorporates its telecom industry material topics list to ensure that emerging risks are considered in the company's materiality assessment. The revisions undergo approval from Zain's Chief Sustainability Officer.

A shortlist of 28 topics was compiled based on previous reports and upcoming trends, which included:

- Datamaran's machine learning telco industry list
- The macro-business environment
- Benchmarking against other prominent players in the industry and region
- Inputs gathered from operational review meetings, business plan meetings, and from leadership and executive management
- Sustainability interests raised by stakeholders
- Socio-economic and political factors

Zain bases its annual Sustainability Report on the results of the materiality assessment exercise to further understand the significant issues for the company and its stakeholders.

2. Assess the Significance of Value Creation

Stakeholder Inclusiveness

Zain defines stakeholders using the definition provided by the Global Reporting Initiative (GRI) as follows:

"Stakeholders are entities or individuals that can reasonably be expected to be significantly affected by the organization's activities, products and services, and whose actions can reasonably be expected to affect the ability of the organization to successfully implement its strategies and achieve its objectives."

The stakeholders engaged in this process include employees, shareholders, investors, and suppliers, as well as groups indirectly impacted by the company's operations—such as local communities, civil society organizations, non-governmental organizations (NGOs), and vulnerable populations.

For the purposes of this report, Zain defines its primary stakeholders as:

Internal	External		
Board of Directors	Regulators	Business Partners	Customers
Executive Management	Shareholders	Financial Institutions	Media
Employees	Suppliers	General Public	NGOs

Beyond the engagement conducted as part of the materiality assessment, Zain regularly undertakes additional stakeholder engagement activities throughout the year. These ongoing interactions help the company understand and respond to stakeholders' expectations more effectively.

Key engagement activities include:

1. Corporate Sustainability (CS) Social Media Outreach:

Zain continued to connect with both internal and external stakeholders through its social media channels, to promote a stronger sustainability culture. The company encourages its audiences to share their views through polls, surveys, and question prompts in post captions. Topics featured during the year include climate change, biodiversity, disability inclusion, children's rights, support for the elderly community, data privacy and diversity, equity, and inclusion.

2. Internal Forums:

Zain facilitates Group-wide and operating-company-level forums to align priorities, exchange best practices, and discuss business-specific sustainability issues. In 2025, several function-specific forums were held, including those for Risk, Legal, Technology, Procurement, Regulatory Affairs, and Corporate Sustainability.

3. Stakeholder Engagement Across Corporate Functions:

Throughout the year, Zain's various functions engaged regularly with stakeholders through analyst, investor, and shareholder meetings, ongoing coordination with regulatory authorities, discussions with partners, customer feedback mechanisms, and other engagement activities linked to each function's scope.

The following table showcases the changes that have been made and provides a year-on-year comparison of the rankings based on the results from Datamaran and survey responses.

Material Topics	Ranking in 2025	Ranking in 2024
Customer Privacy & Data Security	1	1
Digital Transformation	2	2
Business Ethics and Governance	3	5
Human Rights	4	9
Business Model Resilience	5	15
Employee Health & Safety	6	3
Inclusion, Diversity and Equity	7	4
Customer Service	8	6
Supply Chain Management	9	14
Natural Capital	10	17
Selling Practices & Product Labeling	11	20
Digital Inclusion	12	11
Climate Change	13	7
Management of the Legal & Regulatory Environment	14	8
Workforce Management	15	19
Economic Performance	16	13
Waste Management	17	23
Entrepreneurs and SME Development	18	16
Responsible Consumption & Production	19	24
Physical & Sociopolitical Risks	20	10
Competitive Behavior	21	26
Socioeconomic Compliance	22	21
Children's Rights	23	22
Labor Practices	24	18
Philanthropy and Community Engagement	25	25
Mobile Communications and Health	26	12
Biodiversity and Nature Impacts	27	27
Outer Space Management	28	25

While responding to a rapidly evolving digital, regulatory, and geopolitical landscape, several top topics remain consistent year-on-year, however changes in industry trends, stakeholder interests, and global challenges resulted in notable shifts.

The below outlines the key changes affecting the top five material topics:

1. Customer Privacy and Data Security

Customer privacy and data security remains Zain's highest priority topic consecutively. This ranking underscores the continued importance of protecting customer information in a region experiencing fast digitalization, with increasing reliance on digital platforms, stakeholders expect Zain to adopt best in class security practices and maintain a zero-tolerance approach to data breaches.

2. Digital Transformation

Digital Transformation remains key to Zain's long-term strategy and to stakeholder expectations. Consistent with last year's ranking, this reflects the company's direction towards smarter networks, AI-enabled services and improved customer experiences, reinforcing the strategic direction set under the 4WARD strategy.

3. Business Ethics and Governance

Business Ethics and Governance moved into the top three in 2025, driven by stronger stakeholder emphasis on transparency, accountability and responsible decision making. Global regulatory developments including stronger compliance expectations, anti-corruption standards, and governance requirements under International Financial Reporting Standards (IFRS) sustainability disclosures have elevated this topic.

4. Human Rights

Human Rights experienced one of the most notable improvements in ranking. It increased from nine to four in ranking, which reflects the intensifying focus across stakeholders on responsible employment practices, migrant worker protection, gender equality, digital rights, and inclusive access to services.

5. Business Model Resilience

A significant shift in this year's assessment is the elevation of business model resilience from 15 into the top five topics. This reflects growing regional and global uncertainties from geopolitical risks to climate impacts and supply chain disruptions. Stakeholders are increasingly prioritizing Zain's ability to anticipate shocks, safeguard continuity of services, and build resilience into its operations, technology infrastructure, and supply chain.

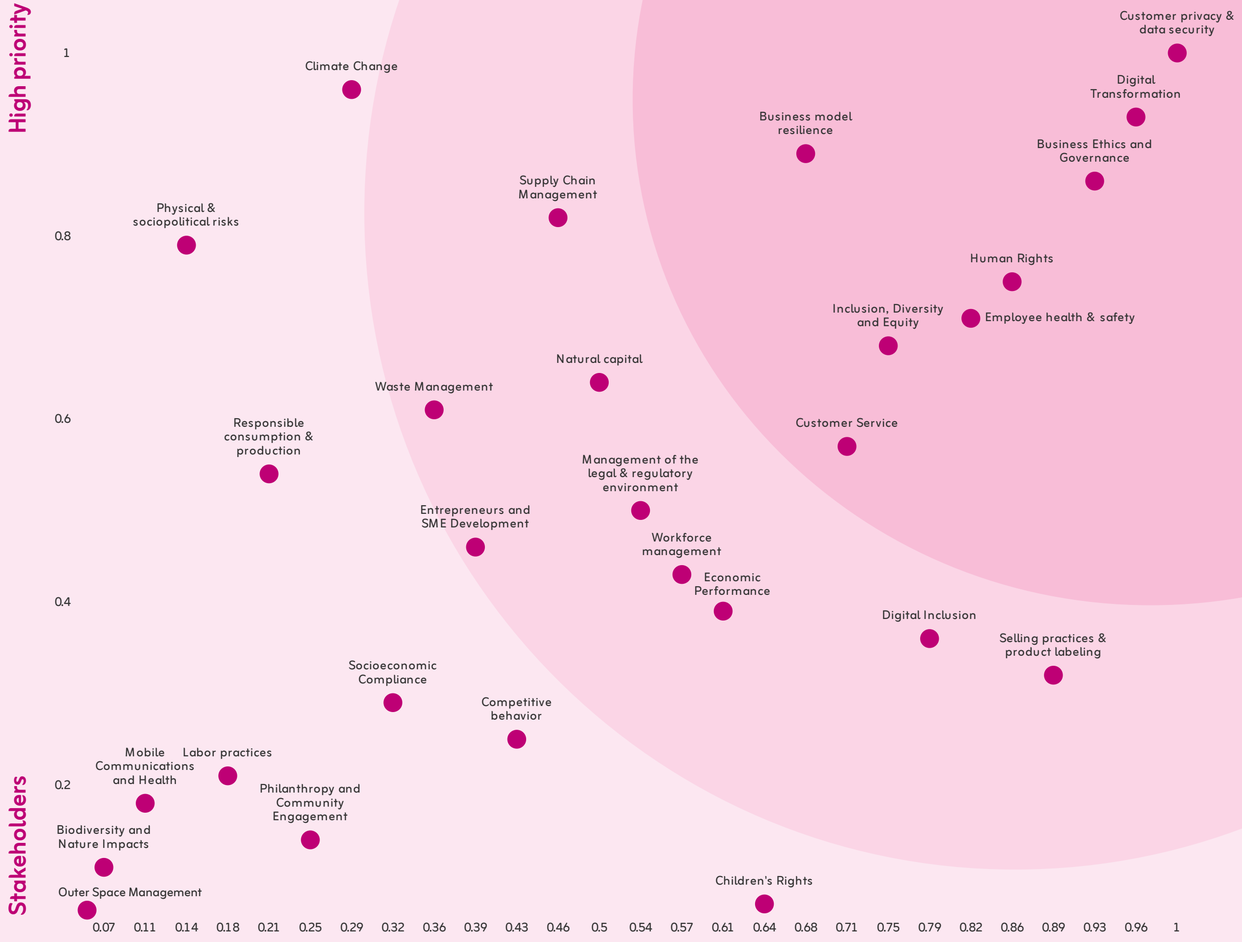


Double Materiality Matrix

Issue	Financial Score	Impact Score
Customer Privacy & Data Security	0.97	0.94
Management Of The Legal & Regulatory Environment	0.78	0.48
Climate Change	0.75	0.80
Physical & Sociopolitical Risks	0.69	0.54
Business Ethics and Governance	0.60	0.66
Business Model Resilience	0.59	0.62
Waste Management	0.59	0.43
Digital Transformation	0.58	0.85
Inclusion, Diversity and Equity	0.57	0.66
Selling Practices & Product Labeling	0.56	0.38
Human Rights	0.55	0.79
Supply Chain Management	0.54	0.53
Customer Service	0.53	0.53
Competitive Behavior	0.51	0.41
Responsible Consumption & Production	0.51	0.37
Socioeconomic Compliance	0.51	0.57
Natural Capital	0.51	0.60
Employee Health & Safety	0.47	0.58
Economic Performance	0.44	0.47
Workforce Management	0.36	0.49
Labor Practices	0.34	0.23
Digital Inclusion	0.34	0.65
Children's Rights	0.30	0.25
Biodiversity and Nature Impacts	0.19	0.23
Entrepreneurs and Sme Development	0.18	0.58
Mobile Communications and Health	0.17	0.33
Philanthropy and Community Engagement	0.12	0.36
Outer Space Management	0.04	0.13

Materiality Matrix

- High priority issues
- Medium priority issues
- Low priority issues



Disclosures on Material Topics

The company continuously assesses and addresses value-creation across its activities to identify its ESG and human rights impacts. This enables Zain to embed how it creates, preserves, or erodes value in its decision-making priorities.

MATERIAL TOPIC
Customer Privacy & Data Security

DEFINITION
How Zain protects customer data and company information from misuse, leaks, or cyberattacks. This includes keeping systems secure and respecting customer privacy at all times.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS
Enhancing Zain's data privacy protocols in line with best practices and complying with local laws and regulations, improves the company's data management practices and creates robust digital infrastructures. This approach helps safeguard stakeholders from issues such as unauthorized account charges, privacy breaches, and identity theft.

HIGH

VALUE CREATED, ERODED OR PRESERVED?
Zain creates value by strengthening digital safeguards that protect stakeholders from data breaches and cyber risks.

SDG 16: Peace, Justice, and Strong Institutions
(Promote effective, accountable, and transparent institutions)

MATERIAL TOPICS
Digital Transformation

DEFINITION
Zain's use of advanced technologies and digital innovations to improve how the business operates and enhance the experience of customers and other stakeholders.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS
Digital transformation profoundly affects a variety of other industries, and Zain's 4WARD strategy seeks to advance the digital ecosystem by leveraging its core services, such as roaming and wholesale. Additionally, the strategy focuses on expanding into other sectors through its digital transformation and investment arm, addressing fields like fintech, ventures, application programming interfaces (APIs), and esports.

HIGH

VALUE CREATED, ERODED OR PRESERVED?
Value is created as digital innovation enhances customer experience, operational efficiency, and long-term competitiveness.

SDG 9: Industry, Innovation, and Infrastructure (Build resilient infrastructure, promote inclusive and sustainable industrialization, and foster innovation)

MATERIAL TOPIC
Business Ethics and Governance

DEFINITION
How Zain operates responsibly and ethically by following laws, regulations, and internal policies. This includes promoting fairness, transparency, and accountability while managing risks related to ethics, anticorruption, fair business practices, and regulatory compliance.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS
The company prioritizes its integrity and ethics with all stakeholders to foster trust. By cultivating its various relationships, Zain can effectively and accurately address stakeholder concerns. A well-established governance model enables management to monitor and manage the organization's value. Ensuring online safety is essential in this context, as it safeguards customer data and upholds trust and transparency.

HIGH

VALUE CREATED, ERODED OR PRESERVED?
Zain creates and preserves value by maintaining ethical, transparent, and compliant business practices that sustain stakeholder trust.

SDG 16: Peace, Justice, and Strong Institutions
(Promote effective, accountable, and transparent institutions)

MATERIAL TOPICS
Human Rights

DEFINITION
Zain's commitment to respecting and protecting human rights across its operations. This includes upholding international standards such as the Universal Declaration for Human Rights, the Core Conventions of the International Labor Organization, and the UN Guiding Principles on Business and Human Rights, promoting freedom of expression, and taking immediate action when any potential harm or violations are identified.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS
Modern slavery, including forced labor, has increased with migrant workers being the most at risk. Strengthening and enforcing laws, regulations, and inspections is crucial for tackling modern slavery. Operating across eightmarkets and managing diverse suppliers, Zain seeks to broaden its impact and uphold its social and environmental practices and values throughout its supply chain.

HIGH

VALUE CREATED, ERODED OR PRESERVED?
Zain creates value by promoting human rights across its operations, while risks such as supply chain labor issues may erode value if not fully mitigated.

SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all)

MATERIAL TOPICS
Business Model Resilience

DEFINITION
How Zain plans for and adapts to social, environmental, and economic risks to stay strong, grow, and create long-term value for both shareholders and society.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS
Zain remains committed to integrating business continuity into its risk management policies, practices, and processes. External circumstances such as natural and humanitarian disasters and geopolitical instability emphasize the need to systematically embed resilience mechanisms into the company's operations. This highlights the company's efforts in ensuring it optimizes long- term value creation while considering the shift in global demographic trends.

HIGH

VALUE CREATED, ERODED OR PRESERVED?
Value is preserved through strong continuity planning that helps the company withstand external shocks and long-term disruptions..

SDG 9: Industry, Innovation, and Infrastructure (Build resilient infrastructure, promote inclusive and sustainable industrialization, and foster innovation)

MATERIAL TOPIC

Employee Health and Safety

DEFINITION

How Zain ensures a safe and healthy workplace for all employees. This includes safety rules, training, work conditions, and support for both physical and mental well-being.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Neglecting to maintain a safe and healthy work environment can result in fatalities, severe injuries, and illnesses, which can impact employees' quality of life and, in turn, impact business productivity, and reputation. Zain remains committed to safeguarding employee health and safety, addressing both physical and mental well-being by evaluating risks and managing work-related incidents. Initiatives include facilitating remote work, offering comprehensive insurance packages, and implementing various programs under the 'BE WELL' wellness initiative, which underscores the importance of mental health, especially during regional conflicts and socio-political turmoil.

HIGH

VALUE CREATED, ERODED OR PRESERVED?

Proactive measures to ensure physical and mental well-being create value by strengthening workforce productivity and safety.

SDG 3: Good Health and Well-being (Ensure healthy lives and promote well-being for all at all ages)

MATERIAL TOPICS

Inclusion, Diversity and Equity

DEFINITION

How Zain supports a diverse and inclusive workplace where everyone is treated fairly. This includes ensuring equal opportunities for all employees, regardless of gender, background, age, or disability.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Zain actively promotes Inclusion, Diversity and Equity (IDE) to enhance social equity, drive economic growth, and attract a wider range of potential talent. By developing IDE competencies, nurturing employees' skillsets, ensuring fair and equal remuneration, implementing strategic Group-wide initiatives, and raising awareness, Zain cultivate s a more diverse and inclusive culture.

HIGH

VALUE CREATED, ERODED OR PRESERVED?

Value is created by building a diverse, equitable, and inclusive culture that attracts talent and supports innovation.

SDG 10: Reduced Inequalities (Reduce inequality within and among countries)

MATERIAL TOPIC

Customer Service

DEFINITION

How Zain ensures customers are treated fairly and respectfully, while keeping up with changing customer needs. This includes efforts to improve satisfaction, build loyalty, and protect Zain's reputation through honest and transparent service.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Offering high-quality and inclusive products and services enhances and supports Zain's customer needs. Ensuring that Zains' customers have reliable connectivity reduces information gaps, boosts economic activity, and promotes greater efficiencies. The company also monitors its Net Promoter Scores (NPS) and maintains open communication channels throughout its operations to address and meet customer requirements effectively.

HIGH

VALUE CREATED, ERODED OR PRESERVED?

High-quality and reliable customer experiences create value by enhancing satisfaction, loyalty, and brand reputation.

SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth)

MATERIAL TOPICS

Supply Chain Management

DEFINITION

How Zain works with suppliers to ensure they meet environmental, social, and governance (ESG) standards. This includes tracking supplier performance, managing risks like delays or shortages, and maintaining clear and responsible communication throughout the supply chain.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Societies with advanced supply chain management systems are significantly impacted as they create employment opportunities and often provide access to healthcare for many. However, supply chains also face increased risks of human rights violations, such as labor abuses, child labor, corruption, and health and safety issues. Zain is dedicated to enhancing and scaling its mechanisms and processes across all markets to address human rights concerns and protect biodiversity throughout its entire value chain. In addition, Zain also ensures it considers how its supply chain manages materials/waste, has ethical policies in place, and how its suppliers align to the company's policies and values.

MEDIUM

VALUE CREATED, ERODED OR PRESERVED?

Strengthening supplier oversight and ESG alignment generates value across the value chain, yet gaps in supplier practices, such as labor, environmental, or governance risks, can erode value when not adequately controlled. .

SDG 12: Responsible Consumption and Production (Ensure sustainable consumption and production patterns)

SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all)

MATERIAL TOPIC

Natural Capital

DEFINITION

How Zain places value on nature, including ecosystems, biodiversity, and natural resources. It reflects how the company relies on and helps protect the environment to support long-term sustainability.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

The construction and operational activities of telecommunication-related infrastructure can impact nature and biodiversity and supply chain by disrupting local habitats and potentially affecting wildlife.
To mitigate these effects, Zain has strategies and processes in place that are highlighted in the company's ESMP guidelines to minimize environmental disruption and enhance biodiversity protection, such as site selection and habitat restoration initiatives.

MEDIUM

VALUE CREATED, ERODED OR PRESERVED?

Value is preserved by minimizing ecological disruption and protecting biodiversity through responsible environmental management



SDG 15: Life on Land (Protect, restore, and promote sustainable use of terrestrial ecosystems, manage forests sustainably, combat desertification, and halt and reverse land degradation and halt biodiversity loss)

MATERIAL TOPICS

Selling Practices & Product Labeling

DEFINITION

How Zain ensures that all product and service information is clear, accurate, and transparent for all customers, regardless of background or age, so they can make informed decisions.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

The products and services sold by Zain have all the needed certification, labeling and information as per regulatory requirements and are in line with best practices. The company's responsible marketing standards also ensures transparent communication, ethical advertising, embrace inclusive marketing, parental and guardian consent and control, responsible use of digital channels, and purpose driven partnerships and collaboration.

MEDIUM

VALUE CREATED, ERODED OR PRESERVED?

Clear and responsible communication creates value by ensuring customers are informed and protected.



SDG 12: Responsible Consumption and Production (Ensure sustainable consumption and production patterns)

MATERIAL TOPIC

Digital Inclusion

DEFINITION

Zain's commitment to ensuring all individuals and communities can access its products and services fairly and without discrimination. This includes making services affordable, accessible, and designed to meet the needs of everyone, especially underserved and vulnerable groups.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Addressing the digital divide and ensuring inclusivity brings a range of socio-economic advantages. The company investigates the needs of marginalized communities and creates opportunities that address their concerns. Zain focuses on catering towards groups such as children and youth, women, the elderly, and individuals with disabilities, setting specific goals by providing inclusive products and services. In addition, the company also establishes programs that address the digital barriers faced by vulnerable segments.

MEDIUM

VALUE CREATED, ERODED OR PRESERVED?

Value is created by expanding accessible digital services that support underserved and vulnerable communities.



SDG 9: Industry, Innovation, and Infrastructure (Build resilient infrastructure, promote inclusive and sustainable industrialization, and foster innovation)

MATERIAL TOPIC

Climate Change

DEFINITION

How Zain manages risks and opportunities related to climate change, including reducing greenhouse gas (GHG) emissions from its operations and value chain. This includes actions to limit Zain's contribution to global warming, address physical risks linked to extreme weather, and adapt to transition risks arising from laws, regulations, and market trends toward a low-carbon economy.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

The company remains committed to managing its emissions throughout its operations in line with best practice and international standard requirements. Climate change motivates Zain to adapt and manage its risks while actively implementing green solutions to assist other sectors in their efforts. Going beyond mere aspirations, Zain is focused on taking actionable steps, leveraging its influence to advocate for policy reforms, introduce energy efficient solutions, and raise awareness to combat climate change.

MEDIUM

VALUE CREATED, ERODED OR PRESERVED?

Zain creates value through emissions reduction efforts, preserves value through climate adaptation, and faces potential erosion when transition or physical climate risks materialize.



SDG 13: Climate Action (Take urgent action to combat climate change and its impacts)

MATERIAL TOPIC

Management of the Legal & Regulatory Environment

DEFINITION

How Zain ensures alignment with legal and regulatory requirements through proactive compliance, transparent engagement with regulators, and responsible corporate practices. This includes maintaining effective compliance systems, fostering constructive government relations, and upholding ethical tax planning to support long-term trust, stability, and operational integrity.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Ensuring compliance with national and international laws, such as data protection and spectrum licenses and regulations, while adapting to changes in legislation. It also requires proactive engagement with regulatory bodies and stakeholders to address potential issues and influence policy reform on various topics including climate change and children's rights.

MEDIUM

VALUE CREATED, ERODED OR PRESERVED?

Value is created through proactive compliance, but may be eroded by regulatory shifts or non-compliance risks.



SDG 16: Peace, Justice, and Strong Institutions (Promote the rule of law at the national and international levels and ensure equal access to justice for all)

MATERIAL TOPIC

Workforce Management

DEFINITION

How Zain attracts, supports, and develops its employees to stay productive and adapt to changes in the organization.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

With around 8,254 employees in eight markets and across all subsidiaries, Zain influences its workforce through its policies, practices, recruitment efforts, employee engagement and retention strategies, and skill development initiatives.

MEDIUM

VALUE CREATED, ERODED OR PRESERVED?

Value is created by investing in employee development, retention, and engagement across all markets.

SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all)

MATERIAL TOPIC

Waste Management

DEFINITION

How Zain manages waste from its operations, including hazardous and non-hazardous materials. This covers reducing, reusing, recycling, and safely disposing of waste to protect human health and the environment.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

The company takes a proactive approach to managing waste throughout its operational infrastructure, its waste management compliance framework as well as in compliance with regulations and international best practices.

MEDIUM

VALUE CREATED, ERODED OR PRESERVED?

Value is created through responsible waste handling that reduces environmental impacts and operational risks.

SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all)

MATERIAL TOPIC

Entrepreneurs and SME Developmentt

DEFINITION

How Zain supports startups and small businesses through ongoing partnerships, investments (like Zain Ventures), and community programs, helping grow the local entrepreneurship ecosystem.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

The MENA region has the highest youth bulge and youth unemployment rate worldwide. To address these challenges, the company aims to build resilience amongst its youth in its communities by creating program, workshops and developing hackathons and entrepreneurship opportunities across the board.

MEDIUM

VALUE CREATED, ERODED OR PRESERVED?

Supporting startups and SMEs creates value by driving economic empowerment and innovation within local communities.

SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all)

MATERIAL TOPICS

Responsible Consumption & Production

DEFINITION

How Zain promotes sustainable consumption and production patterns across its operations and value chain. This includes optimizing resource use, minimizing waste, and encouraging circular economy practices that contribute to environmental protection, operational efficiency, cost reduction, and long-term sustainability.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Zain ensures that it follows specific guidelines under its Environmental and Social Management Plan to promote sustainable consumption and production. This refers to procedures set in place to ensure product safety and service quality for the public.

LOW

VALUE CREATED, ERODED OR PRESERVED?

Value may be eroded if resource inefficiencies, waste generation, or non-circular practices increase environmental and operational risks.

SDG 12: Responsible Consumption and Production (Ensure sustainable consumption and production patterns)

MATERIAL TOPICS

Physical & Sociopolitical Risks

DEFINITION

How Zain navigates risks coming from environmental events, societal shifts, and geopolitical developments that may disrupt operations or stakeholder well-being. This includes addressing natural disasters, political instability, and evolving social trends to ensure business continuity, safeguard communities, and support long-term resilience.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

The company ensures it has proper and robust risk management in place to address any changes that occur to the business or society due to any external event that includes geopolitical conflicts or physical disasters

LOW

VALUE CREATED, ERODED OR PRESERVED?

Value is created through strong risk management systems that protect operations and communities from geopolitical or environmental disruptions.

SDG 16: Peace, Justice, and Strong Institutions (Promote the rule of law at the national and international levels and ensure equal access to justice for all)

MATERIAL TOPIC

Competitive Behavior

DEFINITION

How Zain ensures fair competition in the market, avoids anti-competitive practices, and protects intellectual property rights.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Different aspects play a role in maintaining healthy marketplaces, such as promoting fair competition, protecting, and not infringing on intellectual property, and ensuring equal access to market opportunities. This aspect is also reliant on governmental policies and international fair-trade regulations.

LOW

VALUE CREATED, ERODED OR PRESERVED?

Maintaining fair competition strengthens Zain's market integrity, though risks may arise when competitive pressures challenge equitable market practices.



SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all)

MATERIAL TOPIC

Socioeconomic Compliance

DEFINITION

How Zain stays aligned with environmental, social, and governance (ESG) regulations and global standards. This includes regular assessments, transparent reporting, and a whistle-blowing policy to address and report any unethical behavior that does not align to Zain's standards.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Ensuring compliance with all social and economic laws and regulations helps protect the communities in which the company operates. The company also ensures its non-financial reporting is audited by a third-party organization to ensure the highest level of accuracy in its ESG disclosures.

LOW

VALUE CREATED, ERODED OR PRESERVED?

Strong adherence to ESG regulations and transparent auditing reinforces trust and strengthens the company's governance credibility.



SDG 16: Peace, Justice, and Strong Institutions (Promote the rule of law at the national and international levels and ensure equal access to justice for all)

MATERIAL TOPIC

Children's Rights

DEFINITION

How Zain protects and promotes the rights of children by preventing harm, abuse, or exploitation in both digital and physical spaces. This includes supporting children's wellbeing, safeguarding their personal data, and ensuring safer use of internet services and technologies, while also promoting their healthy development in the real world.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Child online safety remains a critical concern, with risks including online addiction, exposure to harmful material, cyberbullying, and various online scams and threats. Zain addresses these issues by raising awareness and collaborating with stakeholders to enhance child protection measures, such as child helplines. By monitoring internet use, the company aims to mitigate the negative effects of connectivity while enabling children to benefit from e-education and other edutainment services.

LOW

VALUE CREATED, ERODED OR PRESERVED?

Protecting children's digital safety enhances social value, while exposure to online risks may undermine stakeholder confidence if not fully addressed.



SDG 16: Peace, Justice, and Strong Institutions (Promote the rule of law at the national and international levels and ensure equal access to justice for all)

MATERIAL TOPIC

Labor Practicess

DEFINITION

How Zain follows fair labor standards and laws across its operations and value chain. This includes fair pay, safe working conditions, and respect for employee rights.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Adhering to local and international labor laws has significant economic implications. By following these practices, the company can shape employment standards not only within its own workforce but also across its supply chain, minimizing the risk of abuse or discrimination. Zain positively impacts this area by safeguarding the rights of its employees, workers, and those within its supply chain. The company also proactively ensures it follows best practice through its employee incentives, benefit plans and collective bargaining rights.

LOW

VALUE CREATED, ERODED OR PRESERVED?

Upholding fair treatment, safe working conditions, and employee rights enhances workforce stability and reinforces responsible business conduct.



SDG 8: Decent Work and Economic Growth (Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all)

MATERIAL TOPIC

Philanthropy and Community Engagement

DEFINITION

How Zain contributes to the well-being of communities through financial support, volunteerism, and in-kind services. This includes providing aid during emergencies, supporting recovery efforts, and engaging with vulnerable and indigenous groups to foster inclusion, resilience, and shared value across its areas of operation.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Since its inception, Zain has contributed to various philanthropic efforts throughout its operating markets. The company either supports through funds, volunteering efforts or in-kind products and services, especially in crises response.

LOW

VALUE CREATED, ERODED OR PRESERVED?

Contributing to community wellbeing, especially during crises, supports social resilience and deepens Zain's connection to the communities it serves.



SDG 17: Partnerships for the Goals (Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development)

MATERIAL TOPIC

Mobile Communications and Health

DEFINITION

How Zain addresses public health concerns related to mobile technology, including exposure to electromagnetic fields (EMF), and supports broader health risks in the face of infectious diseases, pandemics, and non-communicable illnesses.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

The GSMA states that exposure to low-level radio signals from mobile communications has not been linked to health risks. Zain adheres to official guidelines and upholds the policies and practices outlined in its Environmental and Social Management Plan (ESMP) to protect communities from electromagnetic fields (EMF). Additionally, public health considerations are included in the assessment to address all aspects of health related to this issue.

LOW

VALUE CREATED, ERODED OR PRESERVED?

Although aligned with international EMF safety guidelines, public concerns about mobile radiation can weaken stakeholder perception if not carefully managed.

SDG 3: Good Health and Well-being (Ensure healthy lives and promote well-being for all at all ages)

MATERIAL TOPIC

Biodiversity and Nature Impacts

DEFINITION

How Zain safeguards biodiversity and natural ecosystems by addressing the impact of harmful substances, overuse of resources, and waste generation across its operations. This reflects the company's commitment to protecting land, forests, and ecological balance, recognizing that a healthy natural environment is essential for long-term sustainability and shared value creation.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

Across Zain's operational activities, the company monitors and tracks its impact on natural resources including non-greenhouse gas emissions, land use under base station construction, and pollution.

LOW

VALUE CREATED, ERODED OR PRESERVED?

Infrastructure development may unintentionally strain natural ecosystems, reducing environmental value when mitigation measures are insufficient.

SDG 15: Life on Land (Protect, restore, and promote sustainable use of terrestrial ecosystems, manage forests sustainably, combat desertification, and halt and reverse land degradation and halt biodiversity loss)

MATERIAL TOPIC

Outer Space Management

DEFINITION

How Zain supports the safe and responsible use of outer space by helping manage satellite traffic, reduce space debris, and prevent collisions. This ensures reliable satellite communications and reflects Zain's commitment to minimizing risks as space becomes more vital to connectivity and global operations.

OVERVIEW OF SOCIAL, ECONOMIC, ENVIRONMENTAL, AND HUMAN RIGHTS ASPECTS

As telecommunications technology continues to evolve, satellite networks are becoming crucial for expanding connectivity, especially in underserved and remote regions. As Zain considers future growth and innovation in connectivity, addressing outer space management aligns with a broader vision of Meaningful Connectivity.

LOW

VALUE CREATED, ERODED OR PRESERVED?

As satellite use expands, challenges such as space debris and orbital congestion can reduce operational reliability and environmental value.

SDG 16: Peace, Justice, and Strong Institutions (Promote the rule of law at the national and international levels and ensure equal access to justice for all)



Zain's Top Five Material Topics and their Implication on Value Creation

1. Customer Privacy and Data Security

The protection and confidentiality of personally identifiable information (PII) shared with Zain by customers, employees, suppliers, partners, and other stakeholders is a top priority for the company. Zain is committed to respecting individual privacy and ensuring that all personal data is handled securely, transparently, and in full compliance with relevant laws. The company's Privacy Policy defines the standards and processes governing the collection, processing, storage, and disclosure of personal information in line with applicable legislation.

Throughout the year, Zain implemented a range of measures to not only meet legal and regulatory requirements but also proactively adopt leading practices to safeguard stakeholder data and enhance overall privacy governance.

Implications on Value Creation:

- Strong data privacy practices strengthen stakeholder trust and loyalty, contributing to improved retention.
- Compliance with privacy and data protection regulations reduces the risk of breaches, penalties, and legal challenges.
- Maintaining rigorous data security standards reinforces Zain's competitive positioning and differentiates it within the industry.

2. Digital Transformation

Zain recognizes the critical role of digital transformation in driving innovation and growth across its operations and the wider industry. The company continues to expand its technological solutions while strengthening data governance frameworks, including the responsible use of customer information for clearly defined secondary purposes such as service improvement, fraud prevention, and analytics. These activities are now guided by the new Group Data Privacy Framework, which embeds purpose limitation, data minimization, and strong safeguards. Zain is also advancing its digital capabilities by developing new internal data and AI-driven tools that support operational efficiency and enhance decision-making, ensuring these technologies align with strengthened privacy and data management standards.

Implications on Value Creation:

- Digital transformation allows Zain to automate processes and utilize data analytics to enhance operational efficiency and productivity.
- It enables the company to explore and build new revenue streams and business models beyond its traditional offerings.
- However, increased digitization heightens exposure to cybersecurity risks and potential data breaches, which must be mitigated through strong controls and governance.

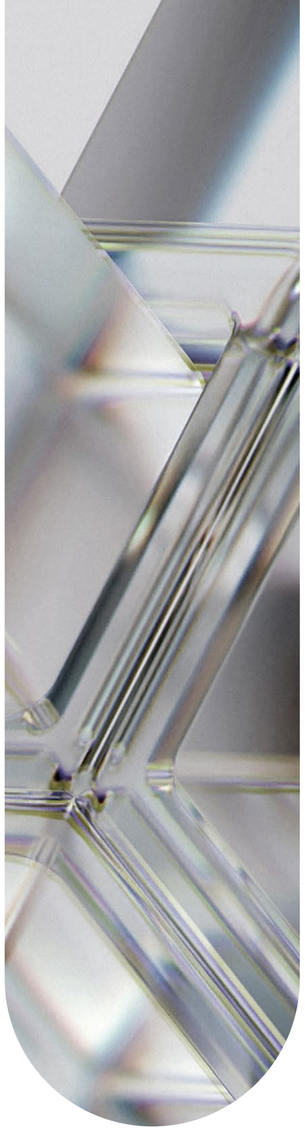
3. Business Ethics and Governance

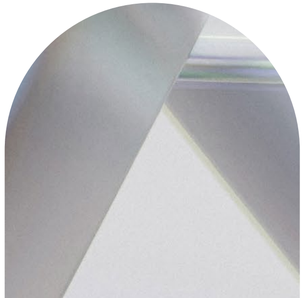
Ensuring fairness, transparency, accountability, and compliance with laws, regulations, and internal policies is central to how Zain conducts business. Strengthening its ethical performance requires Zain to maintain robust governance structures, enforce anti-corruption policies, and engage openly with stakeholders to identify, prevent, and manage risks related to ethics, fair business practices, and regulatory obligations.

Zain emphasizes embedding strong governance mechanisms, clear codes of conduct, and rigorous compliance frameworks across its operations. This includes implementing anti-corruption controls, ensuring transparent decision-making processes, monitoring adherence to regulatory requirements, and promoting ethical behavior across the workforce and supply chain.

Implications on Value Creation:

- Transparent and ethical business practices reinforce confidence among customers, regulators, investors, and partners.
- Strong governance and anti-corruption measures lower exposure to penalties, fines, and reputational damage.
- Clear policies and governance processes ensure consistency, accountability, and effective risk management across markets.
- Ethical conduct across the value chain improves business continuity, supports investor confidence, and enhances long-term strategic resilience.





- Financial Capital: Strong data-privacy practices reduce risk of fines, breaches, and legal costs
- Social & Relationship Capital: Any privacy incident can significantly damage customer trust and stakeholder confidence

- Intellectual Capital: Enhanced capabilities through AI, automation, and advanced data-governance systems.
- Financial Capital: Strong data-privacy practices reduce risk of fines, breaches, and legal costs

- Social & Relationship Capital: Any privacy incident can significantly damage customer trust and stakeholder confidence
- Financial Capital: Strong data-privacy practices reduce risk of fines, breaches, and legal costs

4. Human Rights

Zain is committed to upholding and protecting human rights across all its operating companies, subsidiaries, entities under management control, and value-chain partners. Ensuring respect for human dignity, safety, fairness, and non-discrimination is central to how the company operates. Strengthening its human rights performance requires Zain to maintain clear policies, responsible labor practices, and transparent engagement with stakeholders to identify, prevent, and address risks related to labor practices, community challenges, and ethical conduct.

The company ensures the integration of human rights due diligence mechanisms, comprehensive health and safety standards, and responsible workplace practices throughout its operations. This includes safeguarding employees and contractors at network sites and offices through the implementation of its Environmental and Social Management Plan (ESMP), ensuring fair treatment within the value chain, addressing potential risks through supplier assessments and audits, and promoting equality, well-being, and safe working conditions.

Implications on Value Creation:

- Safe, fair, and respectful working conditions create a positive work environment, improving motivation, performance, and the retention of skilled employees.
- Strong health, safety, and human-rights standards reduce workplace injuries, legal exposure, and associated compensation or healthcare costs.
- Demonstrating consistent respect for human rights enhances Zain's credibility with regulators, employees, investors, and communities.
- Responsible labor practices and supplier engagement improve overall operational quality, reduce disruptions, and contribute to stable, long-term value creation.

(+) Human Capital: Safe, fair, and respectful working environments strengthen employee well-being, productivity, and retention.

(−) Financial Capital: Ensuring strong labor standards and health & safety practices increases operational costs.

5. Business Model Resilience

The company prioritizes responsible operations while ensuring that its business model remains resilient in the face of social, environmental, economic, and human rights shifts across all operating companies, subsidiaries, entities under management control, and value-chain partners. Strengthening resilience requires the company to maintain strong governance systems, uphold integrity, and foster transparent relationships with stakeholders to anticipate, prepare for, and respond effectively to emerging risks.

Zain's approach focuses on embedding risk-management practices, digital and operational safeguards, and stakeholder engagement processes across its markets to ensure business continuity. This includes maintaining robust governance structures, ensuring online and data safety, and leveraging reliable internal controls that support the company's long-term growth. By cultivating trust across its ecosystem, the company enhances its ability to adapt and deliver value despite regional and global uncertainties.

Implications on Value Creation:

- Strong governance and proactive risk management reduce operational disruptions to support long-term growth.
- Transparent operations and responsible data practices enhance confidence among investors, customers, regulators, suppliers, and partners.
- Consistent adherence to responsible business practices lowers the likelihood of compliance breaches, penalties, or reputational damage.
- A resilient business model improves Zain's capacity to navigate external shocks, ensuring consistent service delivery and stakeholder satisfaction.

(+) Manufactured Capital: Strengthened systems, controls, and operational safeguards improve reliability and continuity.

(−) Financial Capital: Investments required for risk-mitigation structures, data protection, and resilience initiatives.



13 Regulatory Context



Zain Kuwait

INITIATIVE

Spectrum & Technical Regulation

ZAIN'S RESPONSE

In 2025, Zain Kuwait acquired additional spectrum. CITRA awarded the 2300/2600 MHz band to the three MNOs as per the normal allocation process; however, Zain Kuwait was awarded 100 MHz in the upper band of 2.6 GHz. The new spectrum will help improve 5G QoS. For the acquisition, Zain Kuwait paid an up-front acquisition fee of KWD 2 million, and the annual recurring usage fee is set at KWD 1million.

Furthermore, Zain Kuwait shut down 3G. The underlying rationale is as follows: 3G requires more power than 2G and 4G; efforts focused on optimizing the network, reducing energy consumption, and minimizing the environmental impact of 3G infrastructure. Although 2G and 4G services still have impacts, technological advancements and network optimizations made them more energy-efficient than 3G.

Using the Integrated Reporting Framework, the following impacts are anticipated:

Financial Capital: ⊕ The grant of spectrum will create more value for Zain. While the acquisition will entail CAPEX and OPEX, deploying the spectrum across its network infrastructure will help Zain Kuwait generate more revenue.

Manufactured Capital: ⊕ The introduction of additional spectrum will result in the need for the deployment of more radio network infrastructure.

Natural Capital: ⊕ The shutdown of 3G minimized the environmental impacts.

INITIATIVE

Infrastructure and Wholesale Connectivity

ZAIN'S RESPONSE

Over the last two years, the Government has taken steps to significantly increase rental fees chargeable to mobile network operators for the leasing of tower space. This had a negative impact on Zain Kuwait's operations.

Furthermore, the current Municipality regulations require that MNOs should not have telecom towers within 20 meters of residential buildings, including schools and places of worship. This will hinder network rollout and increase OPEX and CAPEX costs related to compliance with the new regulations. CITRA requested MNOs to establish a task force to explore alternative solutions for the 20-meter distance

Fixed Network Development Project: The Ministry of Communications, through the Kuwait Authority of Partnership Projects (KAPP), has been pursuing a public-private partnership (PPP) to design, finance, build, operate, maintain, and transfer Kuwait's nationwide high-speed fiber broadband network. While the process has taken approximately two years, the MOC has now selected Batelco as the project operator. It is anticipated that mobile network operators (MNOs) will need to engage with Batelco and CITRA to negotiate reference offers and contractual arrangements enabling them to access and utilize the infrastructure developed under the project.

Using the Integrated Reporting Framework, the following impacts are anticipated:

Financial Capital: ⊖ The increase in rental fees and the obligation to remove sites from locations to comply with the municipality's regulations will adversely impact the business financially.

Manufactured Capital: ⊖ Restrictions on tower placement and the removal of existing sites will disrupt network continuity and limit the efficient deployment of infrastructure, weakening the robustness and reach of the mobile network.

INITIATIVE

Regulatory Compliance – ISO 37301

ZAIN'S RESPONSE

Zain Kuwait was one of the first mobile network operators in the region to achieve ISO 37301 certification, a critical milestone. This certification within the Telecom Regulatory compliance management scope is a testament to the operator's unwavering commitment to regulatory adherence and a culture of integrity across all levels of the organization.

Using the Integrated Reporting Framework, the ISO 37301 certification will have the following consequential impacts:

Human Capital: ⊕ Maintaining ISO certification requires the implementation of a rigorous training program on compliance. This entails Zain's personnel are fully trained in regulatory compliance matters, ultimately benefiting the organization.

Intellectual Capital: ⊕ Demonstrating compliance with laws, regulations, and ministerial decisions requires that the organization collates and creates a database of all relevant statutory and regulatory instruments and that applicable personnel responsible for regulatory compliance become thoroughly acquainted with all relevant provisions. This will build significant intellectual capital within the organization.

Zain Bahrain

CHALLENGE

Spectrum Award/Auction in 700 MHz, 2300 MHz, 2500 MHz and 3800 MHz bands for IMT

ZAIN'S RESPONSE

The Telecommunications Regulatory Authority (TRA) has announced plans to grant spectrum in the identified bands. While the grant of spectrum is typically designed to increase network capacity and improve quality of service, the consequential impact is that mobile network operators have to secure and reserve cash to fund not only the acquisition of spectrum but also the active radio equipment, the additional transmission capacity to serve as backhaul and the additional operating expenses to introduce the extra spectrum. It is essential to note that introducing new spectrum may not yield additional revenue. Consequently, there is a risk of lower profitability. Furthermore, while spectrum auctions have been pushed as the most efficient method of assigning spectrum to potential users, there is a risk that bidders, in seeking larger blocks of spectrum, may inadvertently bid higher, resulting in a much higher cash outflow and potentially adverse consequences for profitability. In such a situation, mobile network operators (MNOs) may have no choice but to pass on the increased costs to consumers. To this end, therefore:

- MNOs, including Zain, continue to advocate for a deferral of the timeline to post 2026 (and further) to align with network investment cycles and device maturity; and
- MNOs continue to advocate for a managed assignment approach for critical bands to preserve service continuity and investment certainty.

Using the Integrated Reporting Framework, the spectrum award/auction will have the following consequential impacts:

Intellectual Capital: ⊕ MNOs will develop new ideas on how to optimally utilize new spectrum bands to prepare the Kingdom for the launch of new technologies such as 6G.

Financial Capital: ⊖ MNOs must source cash to fund the acquisition, deploy infrastructure and manage OPEX

Manufactured Capital: ⊖ MNOs will have to deploy more network infrastructure

CHALLENGE

Regulatory Compliance – ISO 37301

ZAIN'S RESPONSE

A first in the Kingdom: Zain Bahrain secures noteworthy ISO 37301 Compliance Management certification:

Zain Bahrain has been awarded the ISO 37301:2021 certification, an internationally recognized standard for Compliance Management Systems (CMS). As the first telecom operator in the Kingdom, and second within Zain Group (following Zain Kuwait) to achieve this significant milestone, this certification within the Telecom Regulatory compliance management scope is a testament to the operator's unwavering commitment to regulatory adherence and a culture of integrity across all levels of the organization.

- MNOs, including Zain, continue to advocate for a deferral of the timeline to post 2026 (and further) to align with network investment cycles and device maturity; and
- MNOs continue to advocate for a managed assignment approach for critical bands to preserve service continuity and investment certainty.

Using the Integrated Reporting Framework, the spectrum award/auction will have the following consequential impacts:

Human Capital: ⊕ Maintaining ISO certification requires the implementation of a rigorous training program on compliance. This will inevitably mean that Zain's personnel are fully trained in regulatory compliance matters, ultimately benefiting the organization.

Intellectual Capital: ⊕ Demonstrating compliance with laws, regulations, and ministerial decisions requires that the organization collates and creates a database of all relevant statutory and regulatory instruments and that applicable personnel responsible for regulatory compliance become thoroughly acquainted with all relevant provisions. This will build significant intellectual capital within the organization.

Social & Relationship Capital: ⊕ Strengthened trust with regulators, government entities, and external stakeholders due to proven compliance maturity.

Zain Iraq

INITIATIVE

Spectrum & Technical Regulation

ZAIN'S RESPONSE

Zain Iraq has embarked upon the following initiatives with respect to spectrum:

- 2.6 GHz: Zain Iraq has acquired spectrum in the 2.6 GHz band (75 MHz blocks in 4 governorates and 40 MHz blocks in other governorates) to increase the network capacity.
- 900 MHz/2100 MHz interference: Zain has taken proactive steps to help identify sources and locations of interference in the 900, 1800 and 2100 MHz bands. An expert firm (Mobile Systems International) was contracted to undertake extensive measurements across five governorates in Iraq. The objective was to identify sources of interference and ensure compliance with spectrum frequency allocation, as it is crucial for achieving a sustainable and thriving digital ecosystem. The collated information was passed to the CMC (national regulator) for appropriate action against jammers and other sources of interference.

Using the Integrated Reporting Framework, the spectrum award/auction will have the following consequential impacts:

Financial Capital: ⊕ Although the acquisition of new spectrum requires upfront investment, the enhanced network capacity enables Zain Iraq to introduce higher-value data offerings, reduce congestion, and strengthen revenue generation over the long term.

Manufactured Capital: ⊕ The activation of additional spectrum bands requires the expansion and optimisation of radio access infrastructure, strengthening Zain Iraq's network assets and improving overall service delivery.

Intellectual Capital: ⊕ The interference studies and spectrum optimisation efforts have generated valuable technical insights and data, strengthening Zain Iraq's engineering expertise and enhancing its long-term spectrum planning and regulatory engagement.

INITIATIVE

Group Regulatory Compliance Program (RCP)

ZAIN'S RESPONSE

Zain Iraq implemented the Regulatory Compliance Program (RCP), helping the organization avoid legal penalties and reputational risks while ensuring its operations align with regulatory standards. Zain Iraq also plans to achieve ISO 37301 certification readiness in 2026.

Using the Integrated Reporting Framework, the spectrum award/auction will have the following consequential impacts:

Human Capital: ⊕ Maintaining ISO certification requires the implementation of a rigorous training program on compliance. This will inevitably mean that Zain's personnel are fully trained in regulatory compliance matters, ultimately benefiting the organization.

Intellectual Capital: ⊕ Demonstrating compliance with laws, regulations, and ministerial decisions requires that the organization collates and creates a database of all relevant statutory and regulatory instruments and that applicable personnel responsible for regulatory compliance become thoroughly acquainted with all relevant provisions. This will build significant intellectual capital within the organization.

Zain Jordan

CHALLENGE

5G

ZAIN'S RESPONSE

Network Rollout – Phase 3 Deployment

Zain initiated Phase 3 of its national rollout plan, which aims to expand coverage across key metropolitan areas, industrial zones, and commercial districts by 1 February 2026.

Population Coverage Targets:

- Current Coverage: 4,114,940 individuals (35.7%)
- Planned Coverage: 50% of the population by February 2027

Using the Integrated Reporting Framework, the following impacts are anticipated:

Social & Relationship Capital: ⊕ Improved connectivity supports communities, businesses, and public-service delivery across industrial and commercial districts.

Human Capital: ⊕ Implementation requires specialized teams, skills development, and workforce deployment to support continuous nationwide rollout.

Financial Capital: ⊖/⊕ While coverage expansion improves long-term revenue potential, it requires significant CAPEX commitment in the near term.

INITIATIVE

Regulatory Compliance

ZAIN'S RESPONSE

With the continued development of Zain Jordan's regulatory compliance capabilities, several key initiatives under the Regulatory Compliance Program (RCP) were implemented across the organization. These measures further strengthen Zain Jordan's governance maturity and reinforce its commitment to a robust, transparent, and sustainable compliance environment. The implementation of the RCP in Jordan included:

- RCP implemented across the organization
- Compliance Universe reassessed
- Monthly and Board-level reporting established
- New Regulatory Compliance tool implementation in progress
- ISO 37301 readiness assessment scheduled to commence in 2026

Using the Integrated Reporting Framework, the following impacts are anticipated:

Human Capital: ⊕ The rollout of the RCP and the upcoming ISO 37301 readiness activities will necessitate structured compliance training across the organization, enhancing staff competency, awareness, and accountability in regulatory matters.

Intellectual Capital: ⊕ The reassessment of the Compliance Universe and adoption of new compliance tools will strengthen Zain Jordan's internal knowledge base, improve documentation quality, and institutionalize a stronger understanding of regulatory obligations.

Zain Saudi Arabia

CHALLENGE

Spectrum & Technical Regulation

ZAIN'S RESPONSE

The 600 MHz spectrum band remains a key component of Zain KSA's spectrum strategy, with the operator securing 30 MHz in this band. The associated deployment commitments are currently in progress, with ongoing engagement with the Communications, Space & Technology Commission (CST) to support implementation timelines and ensure alignment with regulatory requirements.

This spectrum is expected to play a critical role in enhancing network coverage, particularly in rural and underserved areas, while supporting long-term capacity and service quality improvements. At the same time, the deployment introduces operational and financial considerations linked to network rollout obligations and infrastructure expansion.

Using the Integrated Reporting Framework, the following impacts are anticipated:

Manufactured Capital: ⊕ The introduction of the 600 MHz abnd strengthens network infrastructure by improving coverage footprint and enabling more efficient deployment, particularly in low-density areas.

Intellectual Capital: ⊕ Participating in the auction process and designing deployment plans for new spectrum enhance Zain's technical, regulatory, and commercial expertise. The need to interpret auction procedures, evaluate bidding strategy, and plan spectrum utilization expands the organization's internal knowledge base.

Human Capital: ⊕ Deployment of the new spectrum requires capacity building—engineering teams, network planners, regulatory specialists, and project managers will need upskilling in areas such as 600 MHz radio planning, optimization, and migration strategies. This contributes to workforce development.

Social & Relationship Capital: ⊕ Securing the spectrum strengthens Zain's standing with regulators, partners, and customers by demonstrating commitment to technological advancement and national digital transformation objectives. It also reinforces trust with government stakeholders due to compliance with auction rules and timelines.

CHALLENGE

Infrastructure and Wholesale Connectivity

ZAIN'S RESPONSE

1. Submarine Cable Systems – PEACE and Blue Raman Projects:

The commercial and technical agreements relating to both the PEACE and Blue Raman submarine cable systems were reviewed and formally approved by the Communications, Space & Technology Commission (CST). In parallel, Zain submitted a proposal to relocate the designated landing station (LS) site from Duba to NEOM. This proposal is currently under joint assessment and coordination with CST to ensure full technical, regulatory, and strategic alignment with the national connectivity and international gateway framework.

Using the Integrated Reporting Framework, the following impacts are anticipated:

Manufactured Capital: ⊕ Participation in these submarine cable systems strengthens Zain's international infrastructure, enhances redundancy and route diversity, and improves the resilience of Kuwait's and the region's connectivity ecosystem.

Intellectual Capital: ⊕ The negotiation, approval, and technical assessment processes deepen Zain's institutional expertise in submarine cable architecture, landing station operations, and international gateway frameworks—building long-term internal capability.

Social & Relationship Capital: ⊕ Close coordination with CST and alignment with national gateway strategy reinforce Zain's position as a trusted strategic partner in national digital infrastructure development.

Natural Capital: ⊖ / ⊖ The installation and maintenance of submarine cables may involve limited seabed disturbance and near-shore environmental impact during construction. However, these effects are localized, temporary, and mitigated through adherence to marine environmental standards and routing best practices, resulting in an overall immaterial impact.

ZAIN'S RESPONSE

2. Universal Service Fund (USF):

Zain was actively participating in ten (10) additional project groups tendered by the Ministry of Communications and Information Technology (MCIT) in August 2025. These initiatives aim to expand broadband connectivity across rural and underserved regions, targeting minimum speeds of 20 Mbps, thereby enhancing digital inclusion and advancing national development objectives.

Using the Integrated Reporting Framework, the following impacts are anticipated:

Manufactured Capital: ⊕ The rollout of broadband infrastructure in rural and remote regions expands Zain's network footprint, strengthening nationwide service availability and enhancing overall network capacity.

Human Capital: ⊕ USF projects require field deployments, engineering planning, and operational oversight, contributing to the upskilling of Zain's technical and project management teams.

Social & Relationship Capital: ⊕ Contributing to national broadband initiatives strengthens Zain's role as a key enabler of digital inclusion and reinforces partnerships with MCIT and other governmental bodies.

Intellectual Capital: ⊕ The complexity of rural rollout projects enhances Zain's institutional knowledge of terrain-specific deployment models, cost-efficient engineering solutions, and optimized rural connectivity planning.

INITIATIVE

Regulatory Compliance

ZAIN'S RESPONSE

In 2025, Zain KSA formally initiated the Regulatory Compliance Program (RCP) as part of its commitment to strengthening governance, regulatory adherence, and enterprise-wide compliance culture. The program aims to establish a unified, structured compliance framework that aligns all operational areas with national regulatory requirements and international best practice.

Using the Integrated Reporting Framework, the implementation of the RCP in Zain KSA will have the following impacts:

Human Capital: ⊕
- Personnel will receive training on regulatory obligations and compliance processes, enhancing awareness, capability, and readiness across the organization.
- The program strengthens compliance ownership and accountability throughout business units.

Intellectual Capital: ⊕
- Development of the Regulatory Compliance Register and Instruction Manuals will enhance internal knowledge assets by mapping all applicable regulations and codifying operational responses.
- The documentation process builds institutional memory and strengthens Zain KSA's regulatory intelligence.

Zain Sudan

CHALLENGE

Infrastructure and Wholesale Connectivity

ZAIN'S RESPONSE

Zain Sudan continues to advance the development of national fiber routes intended to connect inland transmission infrastructure to the coastal landing station, enabling the future landing of international submarine cable systems. This program is positioned to significantly strengthen Sudan's international connectivity footprint and elevate the country's role as a regional data transit hub.

However, the Africa One Submarine Cable Project, which constitutes a critical component of this broader connectivity strategy, is currently facing implementation delays. These delays may impact the anticipated timeline for integrating national fiber routes with regional and international cable infrastructure. Since last year however progress has been made where the landing station agreement is under review for the signature of TRPA. Zain Sudan continues to coordinate closely with relevant stakeholders to mitigate the potential impact on national and regional connectivity plans.

Using the Integrated Reporting Framework, the following impacts are anticipated:

Financial Capital: / Potentially The advancement of national fiber routes requires significant investment in long-haul transmission infrastructure, backhaul upgrades, and civil works. This will generate a negative impact on the financial capital at the beginning stages. However these current investments will enhance long-term connectivity value, higher capacity for enterprise and wholesale customers, competitive positioning for future data growth, and returns on investment. The delays in the Africa One Submarine Cable Project may result in postponed returns. This could affect Zain Sudan's financial planning for international gateway and transit-related revenue opportunities.

Intellectual Capital: The planning, design, and engineering activities associated with national fiber expansion enhance Zain Sudan's internal technical expertise in transmission architecture, international gateway design, and cross-border connectivity planning. Continued coordination with ecosystem stakeholders further strengthens institutional knowledge in managing multi-party telecom infrastructure projects.

Human Capital: The implementation of new fiber routes and participation in international connectivity projects enhance the capabilities of Zain Sudan's engineering, regulatory, and project management teams. Delays in Africa One also require additional problem-solving, scenario planning, and stakeholder coordination—further strengthening human capital expertise.

CHALLENGE

Spectrum & Technical Regulation

ZAIN'S RESPONSE

Zain Sudan secured a 2×10 MHz allocation in the 700 MHz band on a temporary basis for a three-year period, effective from 1 January 2026 until 31 December 2028.

This allocation represents a key step in enhancing Zain Sudan's network capabilities, particularly in improving coverage and service quality. However, the temporary nature of the assignment introduces planning considerations in terms of investment optimization and long-term spectrum strategy.

Using the Integrated Reporting Framework, the following impacts are anticipated:

Human Capital: The allocation of 700 MHz spectrum will require Zain Sudan's technical, regulatory, and network teams to deepen their expertise in low-band spectrum utilization, nationwide coverage planning, and optimization practices. Strengthening these competencies will enhance institutional capability, improve operational readiness, and support the long-term professional development of engineering and regulatory staff.

Intellectual Capital: The completion of the consultation phase establishes a clearer and more structured national spectrum management framework. For Zain Sudan, this process enriches the organization's regulatory intelligence, enables more accurate long-term spectrum planning, and strengthens internal knowledge relating to propagation modelling, nationwide broadband deployment strategies, and rural coverage economics. These learnings will reinforce Zain's strategic planning and enhance its specialized regulatory know-how.

Financial Capital: / Access to 700 MHz spectrum—due to its superior propagation characteristics—will deliver significant cost efficiencies in rural and wide-area coverage deployment, reducing site density requirements and lowering long-term CAPEX and OPEX. However, spectrum acquisition fees and the accompanying investment in Radio Access Network (RAN) upgrades may introduce short-term financial obligations that require careful budgeting and phased investment planning.

Manufactured Capital: The introduction of 700 MHz spectrum will materially enhance Zain Sudan's network infrastructure by enabling improved indoor penetration, wider coverage footprints, and more resilient broadband connectivity. This will strengthen the operator's ability to support emerging digital services and improve the overall performance of national telecommunications infrastructure.

Social & Relationship Capital: The transparent completion of TPRA's consultation enhances stakeholder confidence in Sudan's spectrum governance framework. For Zain Sudan, proactive participation fosters stronger institutional relationships with the regulator and positions the company as a technically credible and policy-aligned operator committed to national development priorities.

CHALLENGE

Regulatory Compliance

ZAIN'S RESPONSE

In 2025, Zain Sudan initiated the implementation of the Regulatory Compliance Program (RCP) . As part of the Program's phased rollout, work is currently underway to develop the Regulatory Compliance Register and the accompanying Instruction Manuals, which will collectively form the core governance instruments for ensuring systematic regulatory adherence across the organization. The Program is designed to enhance compliance oversight, strengthen internal controls, and institutionalize a structured compliance culture within Zain Sudan.

Using the Integrated Reporting Framework, the launch of the Regulatory Compliance Program (RCP) in Zain Sudan will have the following impacts:

Human Capital: The implementation of the RCP will require structured training programs to build staff competence in regulatory compliance. This will enhance the capabilities of Zain Sudan's personnel, ensuring they are fully equipped to understand, implement, and monitor compliance requirements across the organization.

Intellectual Capital: As part of the RCP rollout, Zain Sudan is developing a comprehensive Regulatory Compliance Register and Instruction Manuals. This process will contribute to the creation, organization, and institutionalization of critical regulatory knowledge, strengthening the company's internal expertise and improving long-term compliance governance.

Zain South Sudan

CHALLENGE

Spectrum & Technical Regulation

ZAIN'S RESPONSE

The National Communications Authority (NCA) granted Zain South Sudan regulatory approval to deploy LTE services over the 900 MHz band, representing a significant enabler for rural and underserved-area coverage. While low-band LTE spectrum typically enhances coverage footprint and network efficiency, its introduction also requires mobile network operators to allocate capital for radio upgrades, transmission expansion, and additional operational commitments to support extended coverage obligations.

In parallel, during 2025 Zain undertook a comprehensive evaluation of additional spectrum opportunities, which will form part of forthcoming discussions with the NCA within the wider context of the licence-renewal process. This proactive engagement is intended to ensure optimal long-term spectrum planning, strengthen future-ready network capacity, and support the country's broader digital-inclusion objectives. However, increased spectrum resources may also impose incremental financial and operational pressures should deployment obligations outpace demand growth or monetisation potential.

Using the Integrated Reporting Framework, the following impacts are anticipated:

Human Capital: ⊖ The deployment of LTE services over the 900 MHz band requires enhanced technical capabilities in radio engineering, transmission planning, and rural-coverage optimization. This necessitates upskilling Zain South Sudan's network and regulatory teams through targeted training on low-band spectrum utilization, coverage-obligation management, and long-term spectrum strategy. Although this strengthens institutional expertise, it also increases workload pressures linked to expanded operational commitments and more stringent performance obligations.

Intellectual Capital: ⊕ The National Communications Authority (NCA) granted Zain South Sudan regulatory approval to deploy LTE services over the 900 MHz band, representing a significant enabler for rural and underserved-area coverage. While low-band LTE spectrum typically enhances coverage footprint and network efficiency, its introduction also requires mobile network operators to allocate capital for radio upgrades, transmission expansion, and additional operational commitments to support extended coverage obligations.

CHALLENGE

Infrastructure and Wholesale Connectivity

ZAIN'S RESPONSE

Group Regulatory, in close coordination with Zain South Sudan, developed a comprehensive Site Sharing Model and Standard Agreement to serve as the unified reference framework for all negotiations with other licensed operators (OLOs). This consolidated framework formalizes the technical, commercial, and operational conditions governing the sharing of passive infrastructure, with the objective of enhancing sector-wide efficiency, reducing deployment and maintenance costs, accelerating network rollout, and promoting sustainable utilization of telecommunications resources across the country. It further ensures that Zain's infrastructure-sharing engagements remain fully aligned with the regulatory expectations of the National Communications Authority (NCA) and the broader national strategy for improving connectivity.

As part of the implementation of this framework, Zain South Sudan concluded an agreement with GillesTech, the entity formally mandated by the NCA to manage, coordinate, and approve site-sharing arrangements relating to Sudani and Gemtel tower assets. This collaboration represents a significant advancement in the harmonization of industry processes, facilitating improved coordination among operators, optimizing the use of existing tower infrastructure, and strengthening the foundations for more resilient, cost-efficient, and sustainable network expansion. The new partnership is also expected to streamline future negotiations, reduce duplicative infrastructure investments, and contribute positively to service quality and coverage, particularly in areas where passive infrastructure constraints have historically limited network growth.

Using the Integrated Reporting Framework, the following impacts are anticipated:

Human Capital: ⊕ The implementation of a unified Site Sharing Model requires technical, commercial, and regulatory teams to enhance their competencies in infrastructure-sharing processes, contract management, and cross-operator coordination. The engagement with GillesTech and the NCA also necessitates improved internal alignment and staff readiness in regulatory compliance, negotiation, and operational planning. This will strengthen institutional knowledge, enhance workforce capability, and elevate overall organizational efficiency.

Intellectual Capital: ⊖ The development of a consolidated national Site Sharing Model and Standard Agreement generates substantial intellectual capital for Zain. It formalizes processes, standardized commercial and technical principles, and creates a reusable regulatory-compliant framework for all future OLO negotiations. The partnership with GillesTech enriches Zain's understanding of regulated infrastructure-sharing regimes, best-practice governance, and industry-wide harmonization mechanisms—creating long-term strategic value for the organization.

Financial Capital: ⊕ The use of shared passive infrastructure reduces CAPEX requirements associated with tower deployment and lowers OPEX linked to site acquisition, power, security, and maintenance. Harmonized site-sharing arrangements minimize duplicative investments across operators and improve cost predictability. Although additional coordination requirements may impose limited administrative overhead, these are significantly outweighed by the long-term cost-efficiency gains.

Manufactured Capital: ⊕ Shared tower infrastructure improves utilization of existing national telecom assets and reduces the need for new tower construction. This enhances network quality, coverage resilience, and service continuity, particularly in geographies where infrastructure scarcity constrained rollout. The harmonized model strengthens the structural integrity of national telecom assets and supports scalable future infrastructure planning.

Natural Capital: ⊕ By reducing the need for duplicative tower construction, the model minimizes land disturbance, energy consumption, and material use. Improved utilization of existing sites lowers the environmental footprint associated with construction, diesel generators, and backup-power systems contributing positively to national and organizational sustainability targets.

CHALLENGE

Universal Service Fund (USF)

ZAIN'S RESPONSE

The Universal Service and Access Fund (USAF) was reassigned to the authority of the National Communications Authority (NCA), representing a significant step toward strengthening institutional alignment and sector governance. Zain South Sudan is actively engaging with the NCA to provide input on international best practices, most notably the successful Moroccan model, to support the development of a more effective and transparent national universal service framework.

This transition is viewed as a positive advancement for the telecom industry, as the prior arrangement where the USAF was administered under the Ministry resulted in limited coordination with mobile network operators (MNOs) and reduced operational alignment. Under the NCA's stewardship, the Fund is expected to benefit from improved governance, enhanced stakeholder engagement, and more efficient allocation of resources aimed at expanding rural and underserved-area connectivity across South Sudan.

Using the Integrated Reporting Framework, the following impacts are anticipated:

- **Social & Relationship Capital:** ⊕ The reassignment of the USAF to the NCA strengthens institutional cooperation and ensures more structured and transparent engagement with MNOs. Zain's proactive contribution of global best practices enhances sector collaboration and fosters stronger relationships with regulators and stakeholders—supporting more inclusive and equitable national connectivity development.
- **Manufactured Capital:** ⊕ A more coherent national universal service framework is expected to accelerate rural broadband expansion, extend infrastructure reach, and promote more sustainable network deployment across remote areas—strengthening South Sudan's national connectivity footprint.
- **Intellectual Capital:** ⊕ Zain's contribution of international benchmarks such as the Moroccan USAF model builds internal regulatory knowledge and reinforces organizational expertise in universal service strategies. This strengthens Zain's ability to influence and adapt to future sector reforms.

CHALLENGE

Regulatory Compliance

ZAIN'S RESPONSE

The Regulatory Compliance Program (RCP) was implemented across Zain South Sudan, marking a significant advancement in the Company's compliance governance capabilities. As part of this initiative, the Compliance Universe was comprehensively reassessed, monthly and Board-level reporting mechanisms were institutionalized, and the rollout of a new Regulatory Compliance Tool is currently underway. Furthermore, an ISO 37301 readiness assessment is planned to commence in 2026, reflecting the Company's commitment to aligning with international compliance management standards.

Using the Integrated Reporting Framework, the implementation of the RCP will have the following consequential impacts:

- **Human Capital:** ⊕ The full deployment of the RCP framework will necessitate continuous compliance training and awareness programs across the organization, resulting in improved staff competencies, stronger regulatory knowledge, and enhanced accountability.
- **Intellectual Capital:** ⊕ The reassessment of the Compliance Universe, development of structured reporting mechanisms, and introduction of an automated compliance tool contribute to the creation and maintenance of a comprehensive compliance knowledge base, thereby strengthening Zain South Sudan's institutional understanding of regulatory obligations and best practices.



14 Stakeholder Engagement



Zain is committed to engaging openly with all its stakeholders to understand their priorities and expectations and integrate them into its decision-making processes.

Through structured engagement channels such as surveys, official Zain communication channels such as press releases, websites, social media, and online applications, meetings, partnerships, and reporting, the company identifies and prioritizes material topics that reflect its most significant socio-economic and environmental impacts and Zain's value creation. Insights gathered from these interactions guide Zain's 4WARD corporate and sustainability strategies, ensuring the company creates shared value across the six capitals: Financial, Manufactured, Natural, Human, Intellectual, and Social.

The outcomes of these engagements are reflected throughout this report, demonstrating how stakeholder input directly informs Zain's actions, initiatives, and performance across key material topics.

Customers

Priorities

- Reliable service
- Innovative yet affordable and accessible service
- Informed about promotional offerings and relevant information
- Customized products and services that cater to different needs and lifestyles
- Ease, clarity, and transparency of billing
- Ensuring cybersecurity, privacy, and data protection
- High-quality customer service

Mode of engagement

- Social media, flagship and franchise stores, customer service lines, websites, surveys

Frequency

- Ongoing engagement with quarterly performance monitoring

Response

- Feedback led to enhancements in digital self-service tools, Zain app, clearer billing formats, strengthened data protection protocols, and accessible service and communication channels.

Shareholders and Investors

Priorities

- Strong return on investment
- Provide a fair and transparent understanding of the company's strategy and business to current and potential investors
- Open channels of communication with shareholders
- Reduce environmental impact and align to net zero targets

Mode of engagement

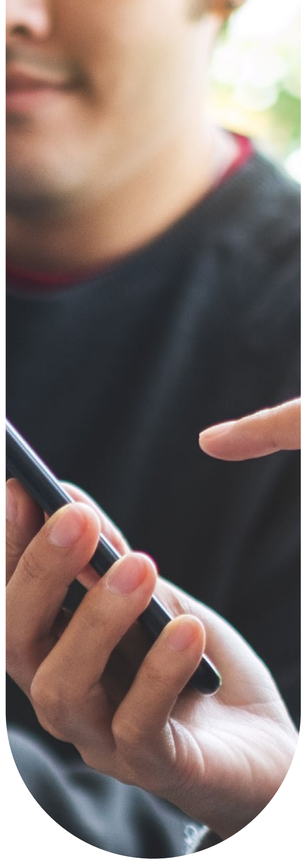
- Reporting, meetings, websites, surveys, analyst calls

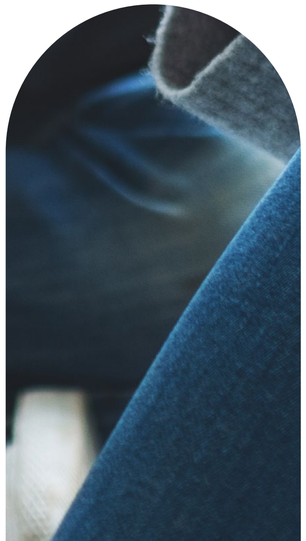
Frequency

- Ongoing engagement with quarterly reporting

Response

- Facilitate regular access to senior management through roadshows and investor conferences, targeting potential investors interested in the region, and ensuring transparent dialog on business performance and strategic direction.





Employees

Priorities

- Job security and satisfaction
- Opportunities for development and skills enhancement
- Competitive and fair compensation and benefits
- Health, safety, and wellbeing
- Inclusive, diverse and equitable for all

Mode of engagement

- Internal communications, employee surveys, training programs, workshops, and wellbeing initiatives

Frequency

- Ongoing engagement with annual surveys, continuous training, and periodic wellbeing campaigns

Response

- Ensure employee satisfaction and growth by maintaining job security, offering continuous development and wellbeing programs, establishing the Unity program, promoting Inclusion, Diversity, and Equity, safeguarding employee health and safety through comprehensive insurance coverage, and providing competitive compensation aligned with market standards.

General Public and Community Institutions

such as neighborhoods near base stations, media, civil society, non-governmental organizations (NGO), advocacy groups, children, charities, associations, foundations, schools, universities, and medical institutions

Priorities

- Minimize pollution and waste
- Uphold health, safety, and environmental standards
- Address community needs in education, health, and economic development
- Advance climate action, energy efficiency, nature conservation, and biodiversity protection
- Engage with civil society, NGOs, and community partners
- Promote inclusion and equal opportunities for all
- Protect children from online harm and promote their rights

Mode of engagement

- Community partnerships, media campaigns, forums, internal and external activities, Environmental Social Management Plan (ESMP) assessments and implementation

Frequency

- Continuous engagement with quarterly and annual reviews of sustainability initiatives

Response

Minimize operational impacts through sustainable site design, renewable energy use, and strict adherence to ESMP and Electro Magnetic Field standards, while supporting local development, awareness campaigns, and climate initiatives aligned with Zain's net zero and Sustainable Development Goal commitments, alongside promoting child protection rights, and inclusion of persons with disabilities across all community programs.

Business Partners

Priorities

- Transparent and fair contracts and agreements
- Conducting periodic evaluations and assessments
- Timely payments and clear communications
- Alignment to Zain's policies and procedures
- Collaboration on innovation and energy efficiency towards net zero goals
- Access to information regarding the company, including financial data, customer data, and other relevant information

Mode of engagement

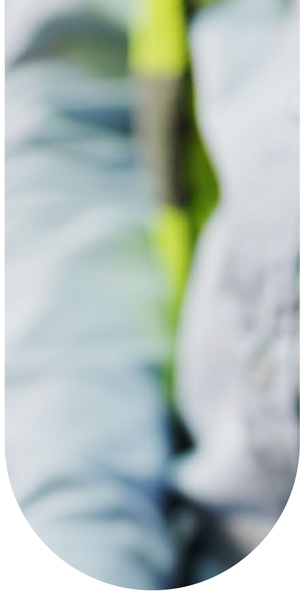
- Regular meetings, forums, supplier assessments, training sessions, and digital platforms

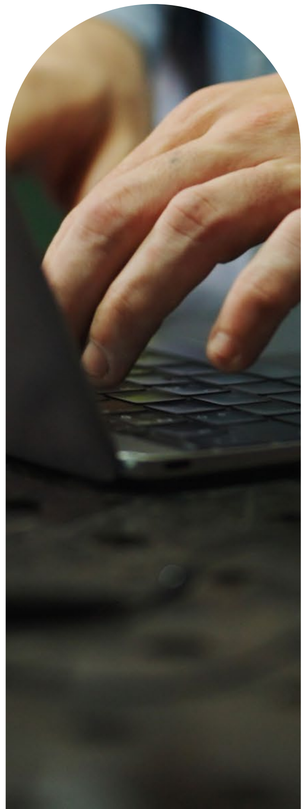
Frequency

- Continuous engagement with quarterly and annual evaluations and reports

Response

- Maintain transparent and fair contractual processes, ensure timely payments, and long-term collaboration through supplier assessments, trainings, and joint initiatives that advance human rights, ethical conduct, and energy efficiency across the value chain.





Government, Regulators, and Industry Associations

Priorities

- Compliance with laws, regulations, and tax requirements
- Protection of stakeholder rights and transparency
- Ensuring network quality, reliability, and coverage
- Proactive risk management and business continuity
- Strengthen cooperation with regulators and government bodies

Mode of engagement

- Meetings, reports, audits, disclosures, and continuous communication with regulatory and tax authorities

Frequency

- Continuous engagement with quarterly and annual reporting

Response

Ensure full compliance with national and international regulations through regular reporting, transparent disclosures, and governance frameworks. Maintain active engagement with regulatory and tax bodies, invest in network quality, and uphold stakeholder rights through strong corporate governance, risk management, and business continuity measures.

MATERIAL TOPIC

Customer Privacy & Data Security, Customer Service, Digital Transformation, Selling Practices & Product Labeling, Digital Inclusion

SUB-TOPIC

Customers

RISK

Data breaches, poor service quality, declining trust and customer acquisition

OPPORTUNITY

Strengthen the brand and customer trust, enhance digital experience, improve rete

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Secure and user-centric digital platforms generate recurring revenues and strengthen customer trust, enabled by robust IT infrastructure and data protection capabilities.



MATERIAL TOPIC

Economic Performance, Business Model Resilience, Business Ethics & Governance, Climate Change

SUB-TOPIC

Shareholders and Investors

RISK

Reduced investor confidence, higher cost of capital, misalignment with sustainability expectations and targets

OPPORTUNITY

Transparent strategy execution and climate alignment support capital attraction and long-term value creation while reinforcing market credibility.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Transparent strategy execution and climate alignment support capital attraction and long-term value creation while reinforcing market credibility.



MATERIAL TOPIC

Workforce Management, Labor Practices, Inclusion, Diversity & Equity, Employee Health & Safety

SUB-TOPIC

Employees

RISK

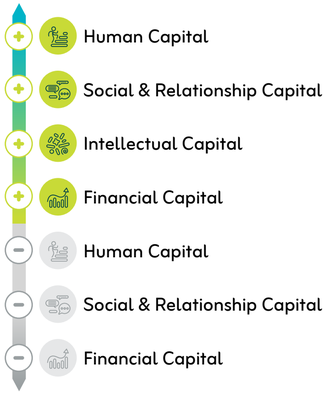
Talent attrition, low engagement, skills gaps, safety incidents, high turnover

OPPORTUNITY

Build a motivated, diverse, inclusive and future-ready workforce

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Continuous learning, wellbeing, and inclusive practices strengthen workforce capability and productivity while fostering a positive organizational culture.



MATERIAL TOPIC

Waste Management, Climate Change, Biodiversity & Nature Impacts, Responsible Consumption & Production, Philanthropy & Community Engagement, Children's Rights, Mobile Communications & Health, Digital Inclusion

SUB-TOPIC

General Public and Community Institutions

RISK

Environmental harm, high waste consumption, community opposition, reputational damage

OPPORTUNITY

Strengthen social license to operate, positive community and environmental impact

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Environmental protection and community investment protect ecosystems and build societal trust, enabling sustainable operations and long-term business continuity.

- Natural Capital
- Social & Relationship Capital
- Financial Capital
- Manufactured Capital
- Natural Capital
- Social & Relationship Capital
- Financial Capital

MATERIAL TOPIC

Supply Chain Management, Human Rights, Business Ethics & Governance, Climate Change, Customer Privacy & Data Security

SUB-TOPIC

Business Partners

RISK

Supply chain disruptions, human and child rights violations, data leaks

OPPORTUNITY

Build resilient and responsible value chain

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Responsible sourcing and ethical partnerships ensure continuity of critical inputs, reduce emissions, and safeguard shared data and knowledge.

- Manufactured Capital
- Social & Relationship Capital
- Natural Capital
- Financial Capital
- Intellectual Capital
- Manufactured Capital
- Social & Relationship Capital
- Financial Capital
- Intellectual Capital

MATERIAL TOPIC

Management of Legal & Regulatory Environment, Business Ethics & Governance, Physical & Sociopolitical Risks, Business Model Resilience, Competitive Behavior

SUB-TOPIC

Government, Regalators, and Industry Associations

RISK

Fines, license risk, service disruptions

OPPORTUNITY

Strong governance, regulatory and tax compliance, and risk management preserve license to operate and support reliable network infrastructure.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Strong governance, compliance, and risk management preserve license to operate and support reliable network infrastructure.

- Financial Capital
- Manufactured Capital
- Social & Relationship Capital
- Intellectual Capital
- Financial Capital
- Manufactured Capital
- Social & Relationship Capital





15 Products and Services

This section highlights how Zain brings its '4WARD–Progress with Purpose' and Sustainability strategies to life by expanding and evolving its product offerings and services. It outlines the economic value generated across Zain's operating markets and illustrates how offerings are tailored to meet the distinct needs and challenges within each market. Over the year, Zain continued to integrate Environmental, Social, and Governance (ESG) considerations across its business activities to strengthen overall resilience.

The section covers the following areas:

ZAIN'S VALUE CHAIN

CORE SERVICES

NON-CORE SERVICES

ZAIN SUBSIDIARIES

Financial Performance

Zain achieved solid financial performance in 2025, generating consolidated revenue of KD 2.3 billion (USD 7.44 billion), up 14% year-on-year (Y-o-Y).

Financial Performance: Direct Economic Value Generated and Distributed

	2025	
	KD m	US$ m
Revenues	2,283	7,443
Cost of Sales	(798)	(2,603)
Operating Costs	(705)	(2,297)
Net Profit	239	777
Retained Earnings	-	-
Dividends Paid	(258,888)	(844,108)
Dividends paid to non-controlling interests	(44,914)	(146,443)
Staff Costs	189	616
Finance Costs Paid	(104,434)	(340,509)
(Repayment of)/ proceeds from bank borrowings (net)	368,819	1,202,540
Income Tax Payments	(13,567)	(44,235)
Kuwait Foundation for the Advancement of Sciences Paid	(2,152)	(7,017)
National Labor Support Tax and Zakat Paid	(7,434)	(24,239)

The full-year committed dividend 35 Fils/Share was distributed ahead of schedule, across two rounds with 10 Fils/Share as of Sep 2025 and 25 Fils/Share as of Nov 2025.

Zain's Economic Impact through the Value Chain

Zain's value chain is composed of several interconnected aspects, each contributing to the company's core operations and its ability to serve customers effectively. The company evaluates the impact of its value chain through social, economic, environmental, and human rights lenses. Key components include network and equipment suppliers, research and product development, hardware and software manufacturers, cloud service providers, system integrators, and distribution partners.

The section below outlines the various channels through which Zain delivers its products and services, along with the employment opportunities generated across these channels. It also highlights examples of core services developed to address the needs of specific communities.

Zain's Distribution Channels

This year, through its distribution channels, Zain generated 127,681 jobs that helped boost economic activity across its markets.

Zain's Value Chain in 2025

Category	Kuwait	Bahrain	Iraq	Jordan	Saudi Arabia	Sudan	South Sudan
Outlets	3,188	3,150	14,150	1,984	2,062	45,622	25,916
Distributors	6	7	1	4	2,748	41	13
Franchise Shops	44	5	72	43	201	83	0
Flagship and Zain-owned stores	15	8	27	27	33	3	12

Zain's Value Chain in 2025

Category	Kuwait	Bahrain	Iraq	Jordan	Saudi Arabia	Sudan	South Sudan
Jobs provided in 2025	5,109	4,382	1,944	4,338	2,408	46,000	63,500

Growth Verticals

To further diversify the company's product offerings and services, Zain continued to establish different lines of business that are scalable and applicable across markets.

1. Financial Inclusion

Zain FinTech, the financial services arm of Zain Group, offers services across its Middle East and Africa footprint, including Zain Cash in Jordan and Iraq, Tamam in KSA, and Bede in Bahrain, Kuwait, and Sudan. Zain FinTech services offer a rich and much-needed range of innovative products and services related to payments, remittances, credit cards, and micro-finance within Zain's ecosystem and beyond. Zain FinTech's B2B software as a service (SaaS) solution provider, FOO, specializes in empowering businesses with Fintech offerings built entirely in-house, which optimize digital capabilities for clients across diverse industries and enables them to deliver an unparalleled user experience.

The following products and services are currently offered as part of Zain Fintech offerings:

- Payment Services
- Credit card
- Virtual card
- ATM Services
- International remittances
- Cash collection
- Corporate cards
- Expense & allowance management
- Digital vouchers
- Micro-financing / Digital installments
- Salary disbursements

Zain Cash Jordan

Zain Cash was established to address Jordan's high reliance on cash and the low levels of formal financial inclusion, particularly among unbanked populations in rural areas, small merchants, freelancers, and gig workers. Lack of access to financial services, limited digital literacy and low trust in digital payments posed significant barriers to adoption. In response, Zain Cash positioned itself as a secure, inclusive, and customer-centric digital financial platform designed to bring formal financial services within reach of all segments of society. Strategic business decisions, including a partnership with Mastercard, investment in Central Bank-compliant infrastructure, expansion of nationwide agent and merchant networks, and large-scale public awareness campaigns, enabled Zain Cash to evolve into a fully integrated digital financial ecosystem.

The company adopted a long-term, ecosystem-driven growth approach, deliberately accepting short-term financial pressures to build market trust, digital confidence, and scalable infrastructure. Significant investments were directed toward subsidized fees, customer education, digital literacy programs, agent training, and system security and compliance. These efforts led to strong double-digit growth in active users, transaction volumes, and customer retention.

Through its digital financial services, women entrepreneurs were able to scale home-based businesses, youth and freelancers were able to receive secure and instant payments, and thousands of agents could access sustainable income opportunities nationwide, alongside the transparent delivery of humanitarian cash assistance in partnership with government and non-governmental organizations (NGOs).

Zain Cash Iraq

Zain Cash entered the Iraqi market at a time when the country faced significant barriers to financial inclusion, with nearly 90% of the population unbanked and strong reliance on a cash-based economy. Challenges such as low trust in digital systems, limited digital literacy, and the absence of reliable payment infrastructure created deep structural obstacles for individuals, small businesses, and underserved groups. To address these gaps, Zain Cash established an end-to-end digital financial ecosystem from the ground up, investing heavily in a nationwide network of over 10,000 agents, deploying a secure, bank-grade platform through Temenos, and creating partnerships across humanitarian organizations, banks, and major businesses.

The company's long-term strategy required substantial upfront financial investment, particularly in agent development, customer education, and public awareness campaigns. While these efforts placed considerable pressure on the company's financial capital in the short-term, they proved essential for mass adoption and long-term market leadership. Trained agents evolved into frontline ambassadors, supporting users, building confidence in digital payments, and enabling transactions on a scale. Marketing and literacy initiatives helped shift public perception, laying the foundation for a high growth fintech vertical within Zain Iraq.

By becoming the first formal financial entry point for millions of Iraqis, the platform significantly strengthened digital inclusion, entrepreneurship, and income generation. Its agent network enabled thousands of micro-entrepreneurs to earn a stable livelihood, while partnerships with organizations such as the UN Food and Agriculture Organization (FAO) modernized humanitarian aid delivery through transparent, secure digital transfers. Women and youth gained safer access to personal finance, e-commerce, and gig economy opportunities.

	Zain Cash Jordan	Zain Cash Iraq
Registered Wallets	683,863	1,614,188
Number of Transactions	81,060,932	33,177,522
Unbanked Population	40-50%	81%



2. Zain Esports

During 2025, Zain Esports undertook 64 tournaments and activations across Zain operations in Kuwait, Bahrain, Jordan, and Iraq. Zain esports in 2025 saw a total of 84,487 registrants and attendees across all activations and tournaments. Since inception in 2021, Zain Esports has attracted approximately 234,714 participants and garnered 550 million+ social media impressions regionally.

As one of the most significant business use cases for 5G and fiber-to-the-home (FTTH), e-gaming was an opportunity Zain identified early on, leading the company to actively cultivate the gaming community across the Middle East and within its own markets. This allows Zain to continue positioning itself beyond its core telecommunications services, expanding its role within the region's digital ecosystem.

Zain Esports' multiple gaming activities centered around the main esports titles, namely Fortnite, Counter Strike, Call of Duty, PUBG Mobile, League of Legends, FC 25 (previously FIFA), Valorant, etc.

The business unit continues to strengthen its connection with youth by expanding its reach through meaningful partnerships with local universities across Jordan. By collaborating with academic institutions, Zain Esports is creating opportunities for students to explore the world of competitive gaming, digital entertainment, and esports management. These partnerships aim to foster a new generation of gamers, creators, and industry professionals by integrating esports into campus life through tournaments, workshops, and educational initiatives. This approach not only nurtures young talent but also bridges the gap between education and the growing esports industry, empowering students to transform their passion for gaming into real-world skills and career opportunities. Through these efforts, Zain Esports reaffirms its role as a leader in driving digital innovation and youth engagement in the Middle East.

Group-wide: Zain esports conducted seven major tournaments, attracting over 530+ participants and over 3 million social media stream views and impressions collectively.

Kuwait: Participated in Comfest 2025 showcasing Duwaween Games, a gaming application with five local card games within the ecosystem.

Bahrain:

- The Zain Esports Lab underwent a comprehensive renovation and rebranding to reflect a more modern, streamlined, and professional environment. The facility now includes over 50 spectator seats, 12 high-performance PCs and PS5's.
- Partnered with the Bahrain Esports federation to operate the National Esports Qualifier for the GCC league, FIFA eWorld Cup and the third Asian youth games, targeting 15 to 18 years with three games titles Rocket League, eFootball, and Street Fighter 6.
- Sponsored two successful external events and venues, including Comfest and Bahrain Sports Day, which saw the complete build up and operations of syndicated esports venues that attracted hundreds of visitors and participants.

Jordan:

- Renewed an agreement with the Jordanian Esports federation to host multiple tournaments and activations within Zain Jordan's state-of-the-art venue, The Dome.
- Signed and partnered with GamerG, an esports platform with over 30,000 players on the platform.
- In partnership with Jordan University, Zain Jordan opened a gaming hall on campus to promote and foster gaming to a new generation of students. Zain Jordan Esports will offer game design courses and provide a dedicated space for lectures and workshops on game development and esports, as well as allow students to book the center for related activities.

Iraq:

- In Iraq, Zain Esports earned an official license from Ubisoft to host the Rainbow Six Siege tournament.
- Secured an official esports partnership with HONOR and Krafton for PUBG MOBILE, including obtaining the official license for Iraq's largest PUBG MOBILE championship – PMNC Iraq Fall 2025. Zain Iraq's sponsorship of the PMNC Iraq 2025 Champions, the winner of which went on to represent Iraq in the PUBG MOBILE Super League (PMSL).
- Zain Esports expanded its network of official partners, including DHL, Al Nomoor, Karada Store, and Moonline Travel & Tourism, strengthening its presence across multiple sectors.
- Sponsored Iraq's only representatives at the Esports World Cup 2025 in Riyadh for FC25, further cementing its role as a driving force in the growth and international recognition of Iraq's esports community.

3. Dizlee – Zain Group's API platform

Dizlee is Zain Group's API-driven digital monetization platform, built to enable and scale a wide spectrum of digital services across its operating companies through a single, unified ecosystem. The platform offers a comprehensive portfolio that includes digital content and gaming services, Direct Carrier Billing (DCB), messaging solutions, digital authentication, network APIs, and other value-added services. By consolidating these capabilities, Dizlee provides a seamless and standardized framework for delivering digital experiences across markets.

Launched in 2018, Dizlee was established to harmonize digital service delivery across Zain's footprint while unlocking new revenue streams from its large and premium customer base. Over time, the platform has evolved into a one-stop ecosystem that connects operators, partners, and service providers, enabling faster go-to-market and consistent deployment of services at scale. This evolution has positioned Dizlee as a critical enabler of digital innovation within the Group.

In 2025, Dizlee delivered strong operational and financial performance, underpinned by continued growth in its Direct Carrier Billing business. The platform supported 289 live services across 58 active partners, reflecting increasing market adoption and strong partner confidence. Overall, Dizlee achieved an impressive 51% year-on-year revenue growth, reinforcing the effectiveness of its platform strategy and execution, and establishing a solid foundation for future expansion and strategic initiatives.

During the same period, Dizlee made significant progress in diversifying its revenue streams and strengthening its long-term sustainability. New business models, including platform fees, were introduced alongside the launch of Network API monetization and Digital Advertising services. The platform also expanded its Communication Platform as a Service (CPaaS) offering, with successful deployment in Kuwait and clear potential for further rollout across other Zain markets. In collaboration with Aduna and multiple partners, Dizlee advanced the commercialization of network APIs, including early adoption of CAMARA-based APIs such as SIM Swap, KYC Match, Subscriber Number Authentication, and Number Verification. These initiatives collectively reinforce Dizlee's role as a key digital growth engine for Zain Group, driving scalable, diversified, and sustainable revenue growth across its markets.

Service	Number of Subscribers in 2025	Number of Subscribers in 2025 (Mn)	Markets Available	Zain Targeted Community
Zain Kids	3,70,000	0.37	IQ,KQ,KSA,JO	Children
Busuu	10,000	0.01	IQ,KW	Low-income community
Pikaboo	1,00,000	0.1	KSA,KW	Children and Youth
AI Avatar	30,000	0.03	KW	Youth
Diva	29,50,000	2.95	IQ	Youth
Shofha+	3,70,000	0.37	Sudan, KSA, KW, BH, JO	Youth
Drapp	50,000	0.05	KW, KSA	Youth, Adults
Blacknut	50,000	0.05	KW	Youth, Gamers
Playono	14,000	0.01	KW	Youth

50.9M
Connected users

7
Connected countries

58
Partners

Over
$487M
Sales

More than
289
live services

4. Zain Ventures

Zain Ventures spearheads Zain's investment portfolio, with the aim of diversifying the company's reach and leveraging future investment opportunities. The company expanded its relationship with regional and international venture capital funds and continued to diversify its portfolio through direct investments, offering them access to Zain's wide geographical reach and expansive customer base.

To date, Zain Ventures has invested $156 million with a 1.8x return.

Key investments in Zain Ventures' portfolio include:

Indirect Investments

- **Valor:** Valor Fund is managed by Valor Equity Partners, an operational growth investment firm focused on high-growth companies across different industries and stages of development.
- **Unbound:** Unbound is a London-based long-term investment firm that partners with entrepreneurs to build "100-year companies." They act as more than just financiers, serving as operators and company builders. Their approach focuses on deep involvement, long-term value creation, and supporting founders beyond capital.
- **BECO Capital III:** BECO Capital Fund III is an early-stage venture capital fund managed by BECO Capital. The fund is based in Dubai and focuses on start-ups in Colle Capital I: This women-founded venture fund targets seed and early-stage technology companies in industries such as FinTech, IoT and healthcare, and is based in the United States. The company invests in organizations that focus on ESG-related activities from business practices to economic and environmental impacts.
- **Wamda MENA Venture I:** Headquartered in Dubai, Wamda MENA Venture I invests in growth-stage technology companies operating in the MENA region. The fund has made investments in industries that are of interest to Zain such as Insuretech.
- **MEVF II:** A MENA-centric fund targeting early-stage technologies in new media, e-commerce, and enterprise software as a service (SaaS). This fund represents synergies with Zain's digital health and Insuretech plans.
- **MEVF III:** A growth-stage fund focusing on Series B technology start-ups in MENA and Turkey.
- Kadmos: Kadmos Capital is a London-based investment firm dedicated to finding Deeptech companies and Impactful technologies in Europe responsible for progress and supporting them from early stages.

Direct Investments

- **xAI:** An AI company founded by Elon Musk in 2023, best known for its chatbot Grok, and built around a mission to create a "truth-seeking" artificial intelligence (AI) that understands the universe, with tight integration into Musk's social media platform, X.
- **Cohere:** Cohere is a Canadian multinational technology company focused on AI for the enterprise, specializing in Large Language Models. With top-performing Generative AI models, Cohere provides multilingual embedding models that enable semantic search, classification and sentiment analysis across 100+ languages. Cohere provides businesses customizable models for unique use cases that can easily be integrated into users' applications.
- **Groq:** A semiconductor company that builds ultra-fast, low-latency inference chips using its custom Tensor Streaming Processor architecture to accelerate AI, machine learning, and high-performance computing workloads.
- **Articul8:** Articul8 offers enterprise customers a full-stack, vertically optimized and secure generative AI software platform. The platform delivers AI capabilities that keep customer data, training and inference within the enterprise security perimeter.
- **Revolut:** Established in 2015, a British FinTech company that offers banking services including GBP and EUR bank accounts, debit cards, fee-free currency exchange, equities, and cryptocurrency trading, as well as peer-to-peer payments. The investment in Revolut will add value to Zain's FinTech efforts and overall offerings enhancing the ecosystem across Zain's footprint.

Other Initiatives:

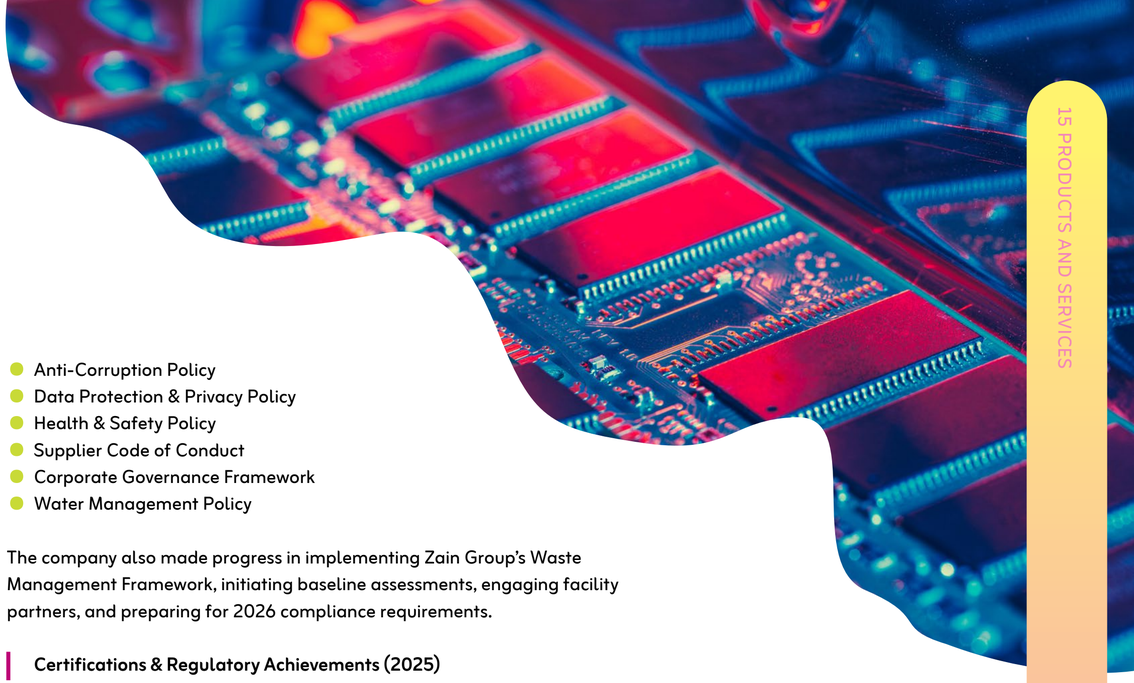
Zain Great Idea

Zain Great Idea (ZGI) is the Group's flagship tech-startup accelerator that supports early-stage entrepreneurs through targeted mentorship, training, and resources. In 2025, the program launched its first regional edition, expanding from Kuwait into Bahrain, Iraq, Jordan, KSA, and the UAE—an expansion powered by Zain Ventures and ZainTECH. The regional call attracted 600+ applicants, from which 13 high-potential startups were selected to join this year's cohort invited to Silicon Valley. Entrepreneurs participated in intensive bootcamps and orientation sessions across Zain markets, engaging with ZainTECH, Zain Ventures, and leading global and local experts. The curriculum covered product development, go-to-market strategy, finance, operations, and investment readiness, supported by experts from IE Business School, Stanford University, Ivy & Company, Noor Coaching, and past ZGI founders. Zain Ventures identified companies for co-development and shortlisted candidates for its 2026 investment cycle. By scaling ZGI beyond Kuwait for the first time in its 15+ year history, Zain is strengthening regional innovation and shaping a more competitive tech-entrepreneurship ecosystem across its footprint

Zainiac

Zainiac is Zain Group's internal innovation platform that allows employees to submit, share, and collaborate on new ideas. It was launched to encourage intrapreneurship and creativity within the company. The platform provides mentoring, workshops, and funding for selected ideas to turn them into real business initiatives. Recently, Zainiac invested in startups founded by employees, demonstrating commitment to scaling internal innovation.
The ideas submitted are on digital transformation topics that align to the company's 4WARD–Progress with Purpose corporate strategy that include fintech and AI initiatives.





5. ZainTECH

In 2025, ZainTECH accelerated its evolution into a unified, region-wide ICT leader through a clear and integrated transformation strategy. A consolidated operating model now connects cloud, cybersecurity, data, digital, and drones and robotics into a single platform enabling stronger delivery, deeper technical expertise, and consistent service across eight markets.

This structure strengthens ZainTECH's ability to scale sustainably while supporting national digital agendas across cloud adoption, cybersecurity resilience, AI enablement, and industrial digitalization.

ZainTECH's approach to sustainability is guided by two principles:

1. Developing solutions that directly enhance clients' environmental efficiency and operational resilience
2. Embedding sustainability considerations across every business unit as part of responsible digital enablement.

ZainTECH's digital solutions, including cloud modernization, AI-driven analytics, energy and air-quality monitoring, immersive training, and non-invasive inspections, enable organizations to monitor performance in real time and adopt more efficient operations. These capabilities support lower emissions, reduced waste, safer environments, and smarter use of resources.

Cloud Business Unit: Sustainable, secure, and efficient cloud migration

In 2025, ZainTECH continued supporting the transition from energy-intensive legacy environments to more sustainable cloud infrastructure. Key achievements include:

- 73% YoY growth in public cloud TCV across AWS, Azure, GCP and OCI
- Expansion of sustainable cloud architecture through the Cloud Center of Excellence
- Integration of Citrus Consulting to strengthen FinOps, cost-optimization, and cloud engineering capabilities

These advancements help organizations reduce energy consumption, minimize hardware waste, and build scalable, secure, and resource-efficient environments.

Data, Digital & AI Hub: Enabling data-driven sustainability

In 2025, ZainTECH consolidated data, digital, and drone capabilities into a unified Digital & AI Hub, enhancing the integration of machine learning, analytics, automation, and computer vision.

Key achievements:

- Activation of Retail Analytics as a flagship product
- Four Microsoft AI Roadshows supporting responsible AI adoption across the region
- One of Microsoft's first OpenAI enterprise implementations with ROSHN (PIF)
- Data platforms and digital dashboards that support more efficient, lower-impact operations

Drones & Robotics

Through the Digital & AI Hub, ZainTECH deployed non-invasive drone-led inspection programs across construction, utilities, and infrastructure sectors—reducing downtime, eliminating the need for heavy equipment, and minimizing environmental disruption. These solutions support safer workplaces, reduced emissions, and better long-term asset health.

Cybersecurity Business Unit: Cyber resilience with resource efficiency

ZainTECH launched AI-SecOps, delivering enhanced threat detection, automation, and protection while reducing the operational footprint of legacy security tools. The Cybersecurity business unit also achieved multiple certifications and expanded compliance scope, reinforcing secure, responsible digital operations across all markets.

Governance, compliance and operational integrity

In 2025, ZainTECH advanced its governance maturity significantly through the formal adoption and alignment of key corporate sustainability-related policies, including:

- Climate Change Policy
- Waste Management Policy
- Human Rights Policy
- Supplier Code of Conduct
- Anti-Corruption Policy
- Data Protection & Privacy Policy
- Health & Safety Policy
- Supplier Code of Conduct
- Corporate Governance Framework
- Water Management Policy

The company also made progress in implementing Zain Group's Waste Management Framework, initiating baseline assessments, engaging facility partners, and preparing for 2026 compliance requirements.

Certifications & Regulatory Achievements (2025)

Certification / Regulation	Type	Status	Scope	Achievement Date	Notes
ISO 22301:2019 – BCMS	ISO	Completed	UAE & Kuwait	Q2 2025	New BCMS certification
CSA STAR CCM v4.0.1	Industry Standard	Completed	UAE, Jordan, KSA	Q2 2025	Expanded scope to includeZainTECH&CloudHub
ISO 27001:2022 – ISMS	ISO	Completed	Group-wide	Q3 2025	Surveillance audit
DESC CSP Security Policy	National	Completed	UAE	Q3 2025	Cloud service provider accreditation
ISO 27017:2015 – Cloud Security	ISO	Completed	Group-wide	Q3 2025	Surveillance audit
ISO 27018:2019 – Cloud Privacy	ISO	Completed	Group-wide	Q3 2025	Surveillance audit
CST Regulatory Framework	National	Completed	KSA	Q3 2025	High compliance level achieved
SOC 2 Type II	Industry Standard	Completed	KSA	Q4 2025	Coverage: security, availability, privacy
ISO 14001:2015 – EMS	ISO	Completed	Kuwait	Q4 2025	New Environmental Management certification

Key Strategic Achievements in 2025

Commercial and financial performance

- 16% YoY growth in sales (TCV)
- Public Cloud TCV +73% YoY
- Microsoft licensing & services +83% YoY
- Revenue +50%, margin +31%, EBITDA +53% YoY

Partnerships and regional leadership

- Selected as one of 10 AWS Datacenter Partners in KSA
- Recognized as leading AWS Partner in the Digital Startups Ecosystem
- Azure ExpressRoute launched on Microsoft Marketplace
- Ijaba, ZainTECH's AI-powered enterprise chatbot, launched on Marketplace
- High-impact cloud and AI programs across BFSI, retail, manufacturing, and government

ZainTECH also showcased its innovation and digital capabilities at two of the region's largest technology platforms:

- **GITEX GLOBAL 2025** – Demonstrated digital resilience, AI, cloud modernization, and end-to-end enterprise capabilities.
- **LEAP 2025** – Showcased cybersecurity, drones, AI readiness, and large-scale digital transformation programs

These events strengthened ZainTECH's position as a leading digital transformation partner in the region.

Industry Awards

- 'Technology Disruptor of the Year' at the INC Best in Business Awards
- 'Best Digital Solutions Provider' at the Tech Innovation Awards 2025
- 'Top Performing Cloud Partner of the Year' by Veeam

Product, innovation and operational excellence

- Established a Product Hub to unify product strategy and lifecycle management
- Integrated the Digital & AI Hub; merged Cloud + Cybersecurity into one unified operating unit
- Completed private cloud optimization (Kuwait & Jordan)
- Expanded ZainTECH Egypt; secured Dubai DET mainland permits
- Advanced ERM, BCM, GRC, and governance frameworks to support ISO certifications
- Launched an enhanced Anti-Corruption Program with 15+ policies

People and capability development

- Company-wide training across cloud, data, AI, and cybersecurity
- Expanded the Egypt hub with 15 hires and transitioned 17 network operating center roles in KSA
- Launched the Generation ZT graduate program
- Supported talent development through NOVA, SUCCEED, Mavericks, and IDEU programs

Looking ahead to 2026

Building on the foundations established in 2025, ZainTECH will deepen its focus on responsible digital enablement and sustainability integration across the business. In 2026, the company will accelerate the rollout of responsible AI frameworks, initiatives that began in 2025, while expanding AI-SecOps capabilities to strengthen cyber resilience for customers across the region.

6. Zain Omantel International (ZOI)

Zain Omantel International (ZOI) continues to strengthen its position as a leading regional wholesale provider, expanding its role in advancing global connectivity and enabling secure, high-capacity digital infrastructure across the Middle East and beyond. The partnership between Zain and Omantel remains a key driver of regional collaboration, leveraging both companies' network assets, subsea and terrestrial capabilities, and global reach.

In 2025, ZOI continued to enhance its offerings for regional operators, hyperscalers, data centers, cloud providers, and international carriers—serving over 50 million subscribers across eight markets while supporting some of the most demanding global connectivity requirements.

Notably, ZOI was the highest-ranked carrier network in the region, and top 100 worldwide, out of 70,000 active networks.

Products and Services:

- Infrastructure: subsea and terrestrial cables; carrier-grade data centers
- Connectivity & Capacity: high-reliability, low-latency global links
- Internet: global internet gateways and content access
- Carrier Solutions: international voice, messaging, and mobile services
- Worldwide Roaming: seamless coverage in 200+ countries

Key Milestones:

One Consortium Membership – Continued Regional Leadership
ZOI maintained its influential role within the One Consortium, reinforcing the region's commitment to combating illegal and unwanted international voice traffic. Through improved coordination and intelligence exchange, ZOI further strengthened regional trust and resilience in telecommunications security during 2025.

Autonomous System (ASN) Enhancements – Superior Network Performance
Following the integration of Zain and Omantel's Autonomous System Numbers (ASNs) in 2024, 2025 saw continued optimization of routing efficiency and traffic engineering. ZOI improved stability across its network footprint and maintained its position among the region's highest-ranked ASNs for performance and reliability.

ZOI Ambassador Program – Growing Internal Advocacy
Building on its successful launch, the ZOI Ambassador Program continued expanding internally across operations in 2025. The initiative strengthened brand alignment, enhanced knowledge sharing among employees, and deepened engagement with industry stakeholders. It also continued to act as a driver of culture, reinforcing ZOI's investment in its human capital.

Global Wholesale Reach – Strengthening Partnerships
In 2025, ZOI expanded its collaboration with regional and global carriers, major hyperscalers, and cloud service providers. These partnerships enhanced ZOI's international footprint and positioned it as a preferred wholesale partner for high-capacity routes between Asia, the Middle East, Europe, and Africa.

The table below provides insights on how Zain's different growth verticals impact the integrated thinking capitals:

MATERIAL TOPIC

Economic Performance and Digital Inclusion

SUB-TOPIC

Fintech (Zain Cash, Bede, Tamam, FOO)

KEY RISKS

- Regulatory and compliance risks across multiple jurisdictions
- Cybersecurity, fraud, and data privacy risks
- Short-term pressure on financial returns due to subsidized fees and customer education costs
- Low digital literacy and trust barriers among unbanked populations

KEY OPPORTUNITIES

- Expansion of financial inclusion for unbanked and underserved groups
- Scalable digital revenue streams beyond core telecom services
- Strengthened ecosystem partnerships (banks, NGOs, global payment networks)

IMPACT ON INTEGRATED THINKING CAPITALS

Fintech drives financial capital through diversified digital revenues, enabled by expanding manufactured capital in agent and platform infrastructure. Digital and financial literacy skills development enhances human capital, builds social and relationship capital through inclusion and trust- ultimately expanding access, stimulating broader economic participation by supporting business

- Financial Capital
- Manufactured Capital
- Intellectual Capital
- Social & Relationship Capital

MATERIAL TOPIC

Business Model Resilience and Children's Rights

SUB-TOPIC

Zain Esports

KEY RISKS

- Online safety risks linked to youth
- Dependence on licenses and game publishers

KEY OPPORTUNITIES

- Monetization of 5G and FTTH infrastructure through gaming use cases
- Deepened youth engagement and brand loyalty
- Development of esports talent, digital skills, and career pathways

IMPACT ON INTEGRATED THINKING CAPITALS

Esports and gaming initiatives are enabled by manufactured capital investments in esports labs, venues, and digital platforms. Events, partnerships, and content ecosystems strengthen intellectual capital, while youth upskilling in gaming, content creation, and esports management enhances human capital. These initiatives also build social and relationship capital by deepening ties with universities, esports federations, and youth segments across Zain's markets.

- Manufactured Capital
- Intellectual Capital
- Human Capital
- Social & Relationship Capital

MATERIAL TOPIC

Economic Performance and Customer Privacy & Data Security

SUB-TOPIC

Dizlee (API & CPaaS Platform)

KEY RISKS

- Data protection, privacy, and regulatory compliance risks
- Platform reliability and service continuity risks
- Dependence on third-party content partners

KEY OPPORTUNITIES

- Scalable digital monetization across markets and operators
- Simplified partner integration and faster time-to-market

IMPACT ON INTEGRATED THINKING CAPITALS

Digital platforms generate high-margin, scalable revenues through unified infrastructure, APIs, and billing systems, reinforcing financial capital. These capabilities enhance intellectual capital through analytics while strengthening social and relationship capital by improving partner ecosystems and customer experience.

- Financial Capital
- Intellectual Capital
- Social & Relationship Capital

MATERIAL TOPIC

Economic Performance and SME and Entrepreneurship

SUB-TOPIC

Zain Ventures (VC & Accelerators)

KEY RISKS

- Investment and valuation risks in early-stage and deep-tech ventures
- Capital allocation trade-offs versus core business investments

KEY OPPORTUNITIES

- Access to high-growth technologies and future business models
- Ecosystem synergies across fintech, AI, cloud, and digital services
- Regional startup ecosystem development through accelerators

IMPACT ON INTEGRATED THINKING CAPITALS

The venture portfolio supports long-term financial growth and innovation by building exposure to emerging technologies, strengthening financial capital. It develops intellectual and human capital through entrepreneurial learning while enhancing social and relationship capital by supporting SME growth and innovation ecosystems.

- Financial Capital
- Intellectual Capital
- Human Capital
- Social & Relationship Capital

MATERIAL TOPIC

Economic Performance and Customer Service

SUB-TOPIC

Zain Insure

KEY RISKS

- Regulatory compliance and licensing risks across markets
- Customer trust, claims handling, and data security risks

KEY OPPORTUNITIES

- Fully digital, frictionless insurance value proposition
- Cross-selling insurance within Zain's ecosystem
- Expansion beyond telecom into InsurTech

IMPACT ON INTEGRATED THINKING CAPITALS

Digital insurance creates new revenue streams through an end-to-end digital platform, strengthening financial capital. It enhances intellectual capital through gathering claims automation while reinforcing social and relationship capital through improved transparency, trust, and customer confidence by expanding access and choice across digital and economic systems

- Financial Capital
- Intellectual Capital
- Social & Relationship Capital

MATERIAL TOPIC

Business Model Resilience and Customer Privacy & Data Security

SUB-TOPIC

ZainTECH

KEY RISKS

- Rapid technological change and evolution
- Cybersecurity and data governance risks
- Delivery and scalability risks across multiple markets

KEY OPPORTUNITIES

- Sustainable cloud migration reducing energy intensity and e-waste
- AI, data, and drone solutions improving efficiency
- Regional leadership in responsible digital enablement

IMPACT ON INTEGRATED THINKING CAPITALS

Advanced ICT solutions contribute to financial capital through revenues and strong margins, supported by manufactured capital investments in cloud, cybersecurity, data, and drone platforms. Deep capabilities in AI, analytics, cloud, and cybersecurity strengthen intellectual capital. Optimized and energy-efficient digital infrastructure supports natural capital by lowering energy intensity ultimately reducing emissions.

- Financial Capital
- Manufactured Capital
- Natural Capital
- Intellectual Capital

MATERIAL TOPIC

Business Model Resilience

SUB-TOPIC

ZOI (Wholesale & Global Connectivity)

KEY RISKS

- Geopolitical and cross-border regulatory risks
- Infrastructure resilience and network security risks
- Exposure to global traffic and wholesale pricing dynamics

KEY OPPORTUNITIES

- Strategic positioning in global connectivity
- Long-term demand from hyperscalers, data centers, and carriers
- Regional leadership in secure, high-capacity networks

IMPACT ON INTEGRATED THINKING CAPITALS

Wholesale operations support financial capital through stable revenues and international diversification, enabled by manufactured capital investments in subsea cables, terrestrial networks, and data centers that extends network reach beyond Zain's markets. These capabilities reinforce social and relationship capital by enabling secure connectivity, regional collaboration, and long-term trust with global partners.

- Financial Capital
- Manufactured Capital
- Social & Relationship Capital

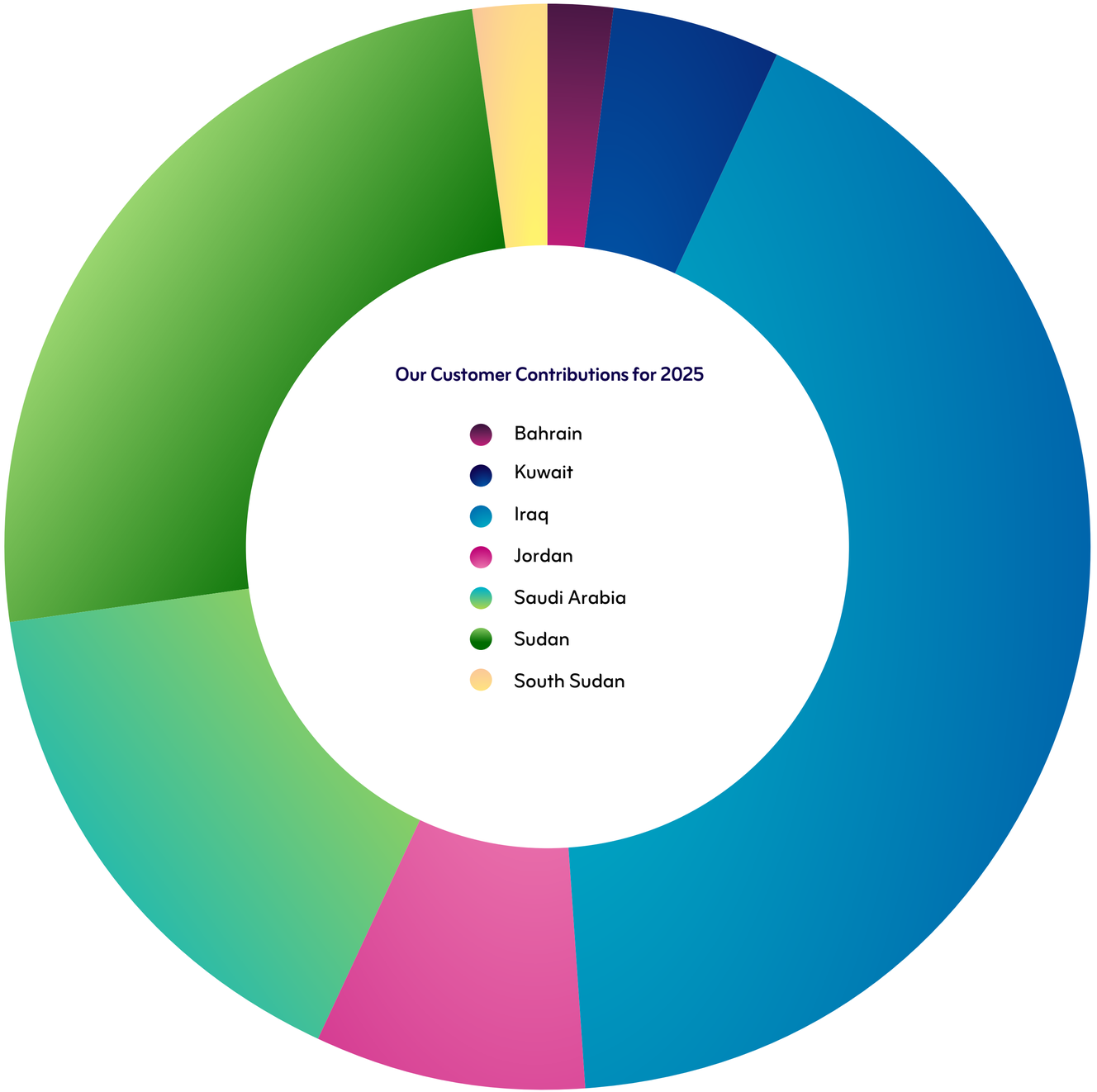


16 Customer Base

Zain Group's total customer base reached 50.9 million by end of December 2025. Zain's overall customer base increased by 4% compared to 2024, with growth in the Sudan, Iraq and Jordan.

The Group customer base remains dominated by the markets with the largest populations and highest potential for growth acquisition - namely Sudan, Iraq and Jordan in order of contribution.

	Ownership (%)	Active Customers (M) December 31, 2025	Active Customers (M) December 31, 2024	Y-O-Y Change
Kuwait	5%	2.6	2.6	0%
Iraq	42%	20.9	19.7	6%
Jordan	8%	4.2	4	5%
Saudi Arabia	16%	8.1	8.9	-13%
Sudan	25%	12.3	10.1	22%



Operation Contribution	%
Bahrain	2%
Kuwait	5%
Iraq	42%
Jordan	8%
Saudi Arabia	16%
Sudan	25%
South Sudan	2%
Total	100%

17 People & Purpose



The Middle East and North Africa region continues to experience a widening gap between youth potential and labor market outcomes. Youth unemployment stands at 24.4%, almost double the global average of 13.0%, reinforcing the urgent need for scalable, long-term solutions that connect young people to decent work.

In parallel, digital disruption is reshaping what it means to be employable. As global employers anticipate that 44% of core job skills will change within five years, organizations are being pushed to rethink talent development as a strategic business priority, not a supporting function. Zain's purpose is to build a future-ready workforce by strengthening employability, accelerating skill-building, and aligning talent capabilities with emerging technologies. Through targeted workforce development, career mobility, and inclusive growth opportunities, Zain aims to create sustained value for its people while supporting economic resilience across the markets it serves.

Employee Breakdown:

In 2025, while Zain's overall workforce remained stable, the ongoing conflict in Sudan significantly affected part-time and temporary employees. The company remains dedicated to supporting those impacted by this crisis, prioritizing their safety and well-being by providing complimentary mental health services and actively monitoring the situation.

To ensure full transparency and reporting accuracy, ZainTECH, BEDE , Zain Omantel International (ZOI), and FOO have been presented as distinct entities within this report.

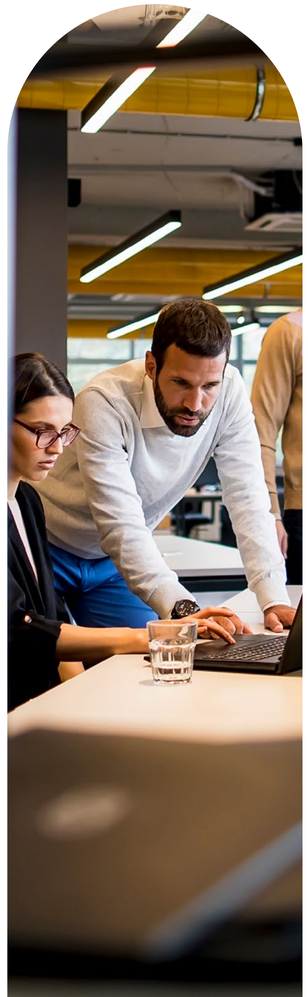


Employee Breakdown Table

	Kuwait	Bahrain	Iraq	Jordan	Saudi Arabia	Sudan	South Sudan	ZainTECH	FOO	BEDE	Total
Full-Time Employees	1,663	246	1,577	1,317	1,593	822	191	633	195	17	8,254
Part-Time and Temporary Employees	1	209	1,374	478	0	0	154	34	8	4	2,108
Employees (All Contract Types)	1,664	455	2,951	1,795	1,593	822	0	667	203	21	10,362
Full-Time Male Employees	1,367	164	1,134	921	1,223	426	148	483	148	9	6,023
Full-Time Female Employees	296	82	443	396	370	396	43	150	47	8	2,231
% Of Full-Time Male Employees	82%	67%	72%	70%	77%	52%	77%	76%	76%	53%	73%
% Of Full-Time Female Employees	18%	33%	28%	30%	23%	48%	23%	24%	24%	47%	27%
New Hires - Male Employees	267	24	304	91	79	43	23	145	30	1	1,007
New Hires % - Males	16%	10%	19%	7%	5%	5%	12%	23%	15%	6%	12%
New Hires - Female Employees	63	9	116	34	52	55	9	29	13	0	380
New Hires % - Females	4%	4%	7%	3%	3%	7%	5%	5%	7%	0%	5%
Total New Hires	330	33	420	125	131	98	32	174	43	1	1,387
Total New Hire %	20%	13%	27%	9%	8%	12%	17%	27%	22%	6%	17%
Staff with Disability	5	1	18	6	26	9	2	3	0	0	70
Staff with Disability %	0.30%	0.41%	1.14%	0.46%	1.63%	1.09%	1.05%	0.47%	0%	0%	0.85%
Employee Voluntary Turnover - Males	124	15	103	60	133	25	5	91	24	1	581
Employee Voluntary Turnover - Males %	7.5%	6%	7%	5%	8%	3%	3%	14%	12%	6%	7%
Employee Voluntary Turnover - Females	37	2	45	36	45	20	0	23	3	1	212
Employee Voluntary Turnover - Females %	2.2%	0.8%	2.9%	2.7%	2.8%	2.4%	0%	3.6%	1.5%	5.9%	2.6%
Total Voluntary Turnover	161	17	148	96	178	45	5	114	27	2	793
Employee Involuntary Turnover-Males	100	0	2	10	83	2	2	24	5	1	229
Employee Involuntary Turnover- Males %	6%	0%	0.1%	0.8%	5.2%	0.2%	1%	3.8%	2.6%	5.9%	2.8%
Employee Involuntary Turnover- Female	9	0	0	2	11	2	0	7	0	0	31
Employee Involuntary Turnover- Females %	0.5%	0%	0%	0.2%	0.7%	0.2%	0%	1.1%	0%	0%	0.4%
Total Involuntary Turnover	109	0	2	12	94	4	2	31	5	1	260
Return to Work Rate After Parental Leave - Females	100%	100%	100%	89.8%	67%	92%	100%	88.9%	100%	100%	94%
Return to Work Rate After Parental Leave - Males	100%	100%	100%	98.73%	99.22%	100%	100%	100%	100%	100%	90%
Retention Rate After Still Working for Zain One Year After Return From Parental Leave - Females	100%	100%	97%	100%	92%	92%	100%	100%	100%	100%	88%
Retention Rate After Still Working for Zain One Year After Return From Parental Leave - Males	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	81%

- Employees All Contract Types - does not include outsourced employees
- New hire % - Female hires are calculated by dividing no. of new-hire females with total number of full-time employees
- Employee Turnover % - Males is calculated by dividing employee turnover - males with total number of full-time employees
- Staff with disabilities are people characterized to have long-term physical, mental, intellectual, or sensory impairment, which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others
- Employee Turnover % - Females is calculated by dividing employee turnover - Females with total number of full-time employees
- Return to work rate is defined as employees returning to work after their respective maternity or paternity leave





Employee Age Structure Table

	% Employees under 30	% of Employees between 30-50	% Employees above 50
Kuwait	19%	73%	8%
Bahrain	16%	81%	3%
Iraq	30%	64%	5%
Jordan	21%	72%	8%
Saudi Arabia	14%	83%	3%
Sudan	6%	73%	22%
South Sudan	20%	71%	8%
ZainTECH	30%	63%	7%
FOO	37%	63%	1%
BEDE	24%	53%	24%

Training and Development

Year-on-Year Average hours of training per employee

2014	14
2015	18
2016	18
2017	18
2018	22
2019	14
2020	10
2021	10
2022	10
2023	12
2024	9
2025	15

Average hours of training

Average Hours of Training per Employee- Males		Average Hours of Training per Employee- Females
19	Kuwait	27
15	Bahrain	19
5	Iraq	10
21	Jordan	31
3	Saudi Arabia	4
47	Sudan	45
3	South Sudan	4
3	BEDE	3
5	FOO	3

* ZainTECH delivers training through third-party partnerships; however, these have been excluded due to limitations in monitoring and tracking training activities.

Supporting Local Talent

In 2025, the average percentage of locals in senior management positions totaled 51% across all Zain markets. This progress reflects Zain's ongoing investment in human and social capital through leadership localization, while simultaneously strengthening the company's overall value-creation direction across the six capitals. The tables below demonstrate the year-on-year percentages of senior management (defined as the top two management levels) comprised by locals in each operation.

Supporting Local Human Capital: Percentage of Locals in Senior Management

	Kuwait	Bahrain	Iraq	Jordan	Saudi Arabia	Sudan	South Sudan	ZainTECH	FOO	BEDE
2016	79%	100%	57%	9%	33%	100%	82%			
2017	81%	86%	40%	9%	51%	93%	88%			
2018	81%	90%	66%	100%	60%	95%	60%			
2019	42%	90%	66%	100%	63%	95%	93%			
2020	43%	82%	56%	100%	61%	96%	92%			
2021	40%	82%	54%	100%	61%	97%	80%			
2022	42%	82%	59%	100%	77%	96%	50%			
2023	46%	76%	52%	96%	58%	97%	67%			
2024	39%	74%	44%	96%	60%	97%	45%	26%	57%	0%
2025	41%	71%	60%	96%	62%	97%	29%	24%	50%	0%

The table below represents the percentage of total local employees in each of our operating markets.

Operations	Percentage of local employees
Kuwait	36%
Bahrain	87%
Iraq	95%
Jordan	99%
Saudi Arabia	82%
Sudan	100%
South Sudan	95%
BEDE	0%
FOO	65%
ZainTECH	53%



UNITY

Launched in 2024, Zain's company-wide culture transformation program, UNITY, evolved in 2025, aligning with the new '4WARD-Progress with Purpose' strategy, embedding Purpose and Customer Centricity deeper into the organization's DNA. The initiative represents Zain's journey toward becoming a purposeful and human-centric organization, built on three interconnected pillars: Purpose, Employees, and Customers. Through these pillars, UNITY reinforces a human-centric mindset, strengthens collaboration across teams, and drives Zain's purpose-led customer experience strategy. The program harmonizes experiences, connects individual purpose with organizational goals, and ensures that the company's values are reflected in the way people work, lead, and engage with customers across all markets.

Unity Highlights by operation:

Zain Kuwait

- Improved customer experience foundations through finalized B2B and channel journey surveys and a mid-year channel workshop.
- Rolled out the Zainers Delight engagement plan, including the cross-operating company Mkhmkh tournament with over 200 participants.
- Strengthened employee experience and UNITY awareness across the organization.

Zain Iraq

- Advanced service improvements through Channel Team initiatives, particularly across complaints-handling and shop experience enhancement.
- Training initiatives led to a 5% increase in CSAT and a 21% rise in employee ratings, reinforcing performance and customer focus.
- Continued strengthening UNITY-related engagement across internal teams.

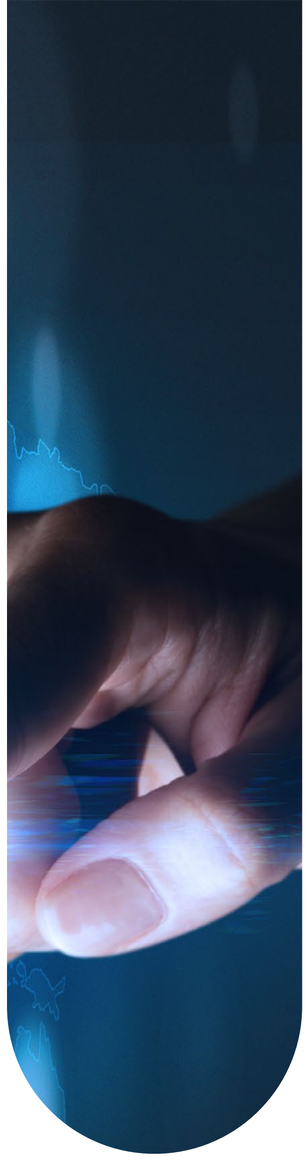
Zain Bahrain

- Empowered employee growth and alignment with UNITY through the UNITY Learning Path, with 61 employees enrolled.
- Completed the Tiny Habits behavior change initiative with over 140 participants actively engaged.
- Launched two priority customer journeys focused on eShop device purchases and prepaid renewals, with journey teams activated and progressing.

Zain Jordan

- Advanced customer experience work through updated channel mapping and Fiber Onboarding Journey preparation.
- Identified and mapped the Employee Journey, focusing on promotion pathways into management roles.
- Launched Channel Teams across multiple departments, beginning impact measurement and early customer feedback initiatives.





Training and Development

IDEU

Zain strengthened employee capabilities through comprehensive upskilling and reskilling initiatives that align with the company's corporate strategy. This ongoing commitment reinforces Zain's focus on developing a skilled workforce that drives innovation and supports the adoption of sustainable practices across the organization.

As a people-centered organization, Zain invested in developing internal capabilities to advance both personal and professional growth, supporting its broader mission and strategic business objectives. In collaboration with IE University in Spain, Zain established the IDEU in 2023 to deliver an inclusive online Digital Transformation program, offering 2000+ employees the opportunity to enhance their digital skills and pursue a master's degree.

In 2025, 974 employees embarked on their digital transformation journey, achieving consistently high results that underscore the program's success. To date, participants have averaged a 96.1% pass rate, earned over 3,900 certificates, completed 60,300 training hours, and we expect the first batch to graduate by the end of 2026, having pursued their master's degrees.

Addressing the Gender Gap

Zain monitored remuneration ratios across all its markets to identify and address any disparities between different organizational levels.

- **100%** – Indicates pay parity, where female and male employees earn the same on average within that level.
- **Above 100%** – Indicates that **female employees earn more on average** than their male counterparts (for example, 120% signifies that women earn 20% more than men in the same category).
- **Below 100%** – Indicates that **female employees earn less on average** than their male counterparts (for example, 80% signifies that women earn 20% less than men).
- **N/A** – Denotes insufficient or non-comparable data, typically due to an absence of either male or female representation within that employee level.

Average Remuneration Ratio Females to Males by Employee Category

	Kuwait	Bahrain	Iraq	Jordan	Saudi Arabia	Sudan	South Sudan	ZainTECH	FOO	BEDE
Employee Level 1 (Executive Management)	79%	94%	105%	131%	86%	93%	N/A	N/A	N/A	N/A
Employee Level 2 (Senior Management)	97%	87%	84%	101%	83%	90%	101%	98%	85%	194%
Employee Level 3 (Middle Management)	113%	84%	86%	90%	93%	96%	N/A	34%	84%	N/A
Employee Level 4 (Team Leaders)	N/A	N/A	107%	101%	91%	100%	108%	N/A	N/A	N/A
Employee Level 5 (Professionals)	115%	103%	89%	97%	90%	88%	N/A	75%	83%	99%
Employee Level 6 (Team Members)	N/A	N/A	92%	92%	92%	N/A	97%	N/A	N/A	38%



WE

Launched in 2017, Zain's Women Empowerment (WE) initiative set a clear goal for 2030, to increase women's representation in leadership roles to 30%. Currently, women represent 29% of the overall workforce, with 23% in middle management and 16% in leadership roles. Over the past year, this reflects a positive progression, with middle management increasing by 5% and leadership representation growing by 2%

In 2025, Zain continued to advance its WE programs, building on the success of previous years to strengthen leadership capabilities, enhance career mobility, and address representation gaps across all levels of the organization.

NOVA

In response to ongoing underrepresentation of women in technical divisions, NOVA was expanded in 2025 as a dedicated intervention initiative aimed at equipping women with the tools and confidence to thrive in tech-driven environments. The program began with a two-day retreat focused on self-awareness, resilience, and collaboration, utilizing the VIA Character Strengths framework to promote personal and professional development. Participants then took part in Outward Mindset and Performance sessions that applied practical, real-world case studies to strengthen leadership and problem-solving skills. The program achieved strong engagement results, with a 94% overall satisfaction rate and 93% knowledge acquisition and application rate.

In 2025, building on insights collected from women in technical divisions, NOVA conducted a retreat, focusing on three areas, mindset transformation, community building, and coaching. To date, 148 participants have completed the retreat, one Mindset session, and 10 ongoing Performance sessions focused on real-world case studies and practical leadership challenges.

WE SUCCEED

Zain relaunched the WE SUCCEED program to empower women in middle management through structured career development and leadership training. The 2025 edition targeted 50 participants and was designed to unlock role expansion opportunities and strengthen readiness for future leadership positions. The program focused on building an Outward Mindset approach, followed by technical and behavioral skill development through Outward Leadership sessions and assessments.

Key focus areas included leadership and people management, critical thinking, communication, problem-solving, and business judgment. Technical modules covered include change management, project and risk management, process improvement, and data-driven decision-making.

During the year, the WE SUCCEED program strengthened the Middle Management and Leadership pipeline by enrolling 50 women nominated by their respective CEOs. The program's first phase focused on Mindset Transformation, introducing participants to the Outward Mindset methodology before progressing to Outward Leadership training. By the end of the quarter, 96% of participants completed all sessions, resulting in the development of 50 individual leadership profiles that will guide ongoing growth and mentorship plans.

Through these initiatives, WE SUCCEED supported Zain's 2030 target of increasing women's leadership representation to 30% across all operations.

BE WELL

The BE WELL initiative reflects Zain's ongoing commitment to embedding employee wellbeing into the core of its operations, moving beyond standalone initiatives toward a more integrated and strategic approach. The program provides employees with access to resources supporting mental, physical, and social wellbeing, including complimentary counselling and therapy services, expert-led workshops, and targeted initiatives designed to enhance awareness, resilience, and performance.

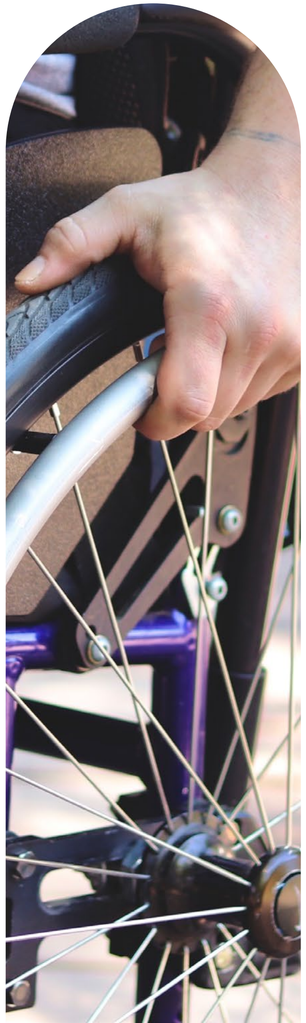
In 2025, Zain partnered with One Mind to conduct the Mental Health at Work Index, enabling a data-driven assessment of wellbeing maturity across operations. Building on these insights, a two-day workshop with the Zain and Omantel Wellbeing Committee translated the findings into a clear, actionable vision for BE WELL 2030, with a focus on more personalized wellbeing that reflects diverse workforce needs. The workshop defined foundational pillars now guiding the strategy, including personalized wellbeing, strengthening Zain's internal wellbeing culture, and driving regional impact through stigma reduction and increased mental health literacy.

Throughout 2025, each operation leveraged its Index results and this shared vision to develop and implement tailored, locally relevant action plans aligned with the broader BE WELL 2030 framework.

BE WELL Partnerships and Initiatives:

1. Kuwait Counseling Center (KCC): Zain continued its partnership with KCC, providing confidential and unlimited therapy sessions for employees. Throughout the year, more than 944 sessions were conducted, supporting 141 employees across the organization. With more than 2,513 sessions carried out overall since 2021. These sessions offered a safe space for individuals to seek guidance and maintain mental wellbeing during challenging times. In addition, a groupwide session titled "Managing Stress and Uncertainty" was hosted with KCC expert Marie Abdel-Ahad, equipping 72 attendees with practical tools to navigate stress and build resilience amid regional and global challenges.
2. Middle Eastern Psychological Association (MEPA): As Platinum Sponsor of the 8th Annual MEPA Conference and Expo, held under the patronage of His Excellency Dr. Ahmad Al-Awadhi, Minister of Health, Zain reaffirmed its role in promoting mental health awareness and dialogue across the region.
3. BE WELL 2030 Youth Wellbeing Initiative: This initiative was launched, beginning with a comprehensive youth wellbeing survey designed to identify key employee needs. A total of 791 Zain youth employees participated, highlighting anxiety or overthinking, financial stress, and burnout or exhaustion as the most common challenges faced. Notably, only 39% of respondents reported feeling comfortable discussing wellbeing at work, underscoring the need for a more open and supportive environment. In response, Zain delivered three Youth Wellbeing sessions, "Feel It, Name It, Navigate It" with psychologist Renad Haddad, "Overthinking, Anxiety, and Career Uncertainty" with Dr. Sara AlSayed, and "Sleep & Movement: Recharge & Build Resilience" with Dr. Sami Ouanes, reaching a total of 342 youth employees. Following this, each operation developed tailored action plans based on their respective youth survey results to address local needs and priorities.
4. Mental Health First Aiders: In recognition of the increasing pressures that employees may face both in and outside the workplace, Zain continued to invest in creating a supportive and empathetic environment through its Mental Health First Aider (MHFA) program. The program equips selected employees with knowledge and tools to recognize signs of mental distress, listen with empathy, and provide safe, confidential support. As of 2025, Zain has trained 24 Mental Health First Aiders across its operations. These individuals serve as accessible points of contact, helping to guide colleagues toward available resources and professional assistance when needed. The continued development of the MHFA network reflects Zain's commitment to wellbeing, compassion, and fostering a workplace culture where employees feel heard, understood, and supported.
5. The Mentl Awards: BE WELL was recognized for the first time since its inception in 2021 with a wellbeing-specific honor at The Mentl Awards, receiving the Highly Commended Award for Outstanding Diversity, Equity, and Inclusion Initiative, positioning BE WELL on a regional stage for its impact on employee wellbeing. The award acknowledged BE WELL's role in creating psychologically safe workplaces, expanding access to support, tailoring wellbeing to diverse cohorts, and driving regional stigma reduction.







WE ABLE

As part of Zain's ongoing commitment to inclusion, the WE ABLE initiative empowered employees with disabilities (PWDs) by strengthening environments that promote growth, visibility, and leadership potential. Building on the progress achieved in 2024, the initiative evolved to further integrate accessibility and inclusion within the company's culture and operations, ensuring that every employee has the opportunity to thrive.

In 2025, Zain marked a significant milestone in its inclusion journey with the launch of the WE ABLE 2030 Vision, setting a bold new direction for disability inclusion across the Group. Aligned with the '4WARD-Progress with Purpose' strategy, the vision introduces a pioneering Global Disability-Inclusive AI Governance Framework, ensuring that people with disabilities are empowered and represented in the evolving digital and AI landscape.

The WE ABLE 2030 Vision is built on five strategic pillars: Global Disability-Inclusive AI Governance, Inclusive Employment and Retention, Innovative Products and Services Designed for All, Global Recognition and Storytelling, and Leadership Development for PWDs. Together, these commitments reinforce Zain's dedication to creating a workplace and society that are equitable, accessible, and inclusive for all.

Be My Eyes

In 2024, Zain was the first company in the MENA region to partner with Be My Eyes, a global app that connects and brings accessibility support to people who are blind or with low vision with volunteers worldwide through live video and artificial intelligence. Throughout this partnership, Zain employees in 8 markets volunteer during dedicated volunteering events offering real-time assistance with everyday tasks. Throughout the year, 10 volunteering events were held, resulting in 1873 successful support calls, with caller satisfaction rate of 97.97%, and volunteer satisfaction rate of 99.8%.

Disability Etiquette Sessions

A disability etiquette session was delivered in Zain Group and Zain Kuwait by employees with disabilities, engaging 47 participants and promoting greater understanding of inclusive interactions in the workplace. Zain Bahrain delivered an accessibility awareness session to 15 participants during the Zain Summer Camp, with 2 disability etiquette sessions in Q1 and Q3, nominated Marwa Al Qattan to the one-year Future Maker Program offered by PurpleSpace, to support leadership development for people with disabilities, amongst 50 individuals with disabilities worldwide, and completed the Accessibility Building Project with inclusive signage and artwork across the designated floor and main entrance. In Zain Iraq, 3 Disability Etiquette sessions, were held with over 60+ employees alongside a sign language awareness session attended by 22 participants to strengthen communication accessibility, and nominated Gangawar Smail to the one-year Future Maker Program offered by PurpleSpace, to support leadership development for people with disabilities, amongst 50 individuals with disabilities worldwide. Zain Jordan conducted 12 disability etiquette awareness sessions with 250+ employees and implemented a four-phase GROW job shadowing journey for six participants, providing structured exposure, upskilling, hands-on learning, and coaching to support professional growth.

WE ABLE Awareness

Zain Group Procurement team started their journey with supplier accessibility, through partnering with the Business Disability Forum to engage with over 600 organizations in the procurement network.

The "People, First" storytelling campaign (11 videos) was used by PurpleSpace as a global learning resource through a case study and highlighted by the ILO.

Be My Eyes launched a case study on Zain's WE ABLE program, as the first of its kind in the region, leading the way for a more inclusive and accessible world.

Zain Iraq launched its service directory on the Be My Eyes app, becoming the first telecom in the region to integrate customer care and an AI agent for their customers who are blind or with low vision, ensuring equitable access to their products and services.

Zain Jordan launched the Physical Accessibility Framework for Jordan Buildings in collaboration with the Jordanian government.

ZainTECH received the Mawaama certificate from the Saudi government for their KSA building's physical accessibility.

ZY

Zain Youth (ZY)

The ZY pillar is dedicated to empowering young employees at Zain by investing in their professional growth, equipping them with the skills and resources needed to realize their full potential within the workplace. Over the years, ZY has launched several initiatives and programs designed to strengthen youth development and foster a culture of continuous learning and advancement including:

- **Generation Z Program:** An annual initiative that onboards fresh Kuwaiti graduates, receiving training, development through rotational programs and work on strategic projects. Top achievers are offered and sponsored by Zain to undertake their MBA at the UK's London Business School.
- **ZY Counsel:** A distinguished group of high-potential young professionals recognized for their strategic insight and innovative problem-solving skills. The Counsel serves as an advisory and change management body, tackling key operational challenges and contributing to strategic decision making across the organization. More information can be found below.
- **ZY Mavericks:** A group of highly skilled young professionals who earn specialized certifications to train and mentor their peers through the ZY Learn program. They play an active role in supporting and contributing to a wide range of projects across the organization.
- **ZY Learn:** An interactive and youth driven training program that focuses on developing both soft and technical skills. Designed by young employees for their peers, the initiative aims to bridge skill gaps and equip participants with the capabilities needed to become future leaders within the organization.

Generation Z Program

2025 marks the tenth cycle of the Generation Z program, where six university graduates were selected to participate in a year-long intensive program designed to align and prepare them to support Zain's recently launched 4WARD - Progress with Purpose strategy, which focuses on continuity, acceleration, collaboration and digital innovation. The program this year gave the graduates an opportunity to work with Zain Kuwait's Digital Factory, covering UI/UX, Development, Product Management and Project Management.

Key highlights from this year's program include:

Generation Z's Evolution:

2016
Zainers 2.0
Focused on a rotation in different departments throughout Zain Group with an emphasis on conducting research on various digital verticals

2017
Generation Z
Generation Z, 2017 Centered on establishing a business, gaining entrepreneurial skills, and studying innovative trends in the market

2018
Generation Z
The theme for this cycle was to enhance digital skills such as coding and agile project management in addition to a focus on self-growth and development

2019
Generation Z
Enhancing corporate culture and teamwork when managing projects were the main focus of this edition

2020
Generation Z
This cycle incorporated three themes: corporate culture, leadership styles, and future trends

2021
CODE 7
Focused on developing digital skills for future data analysts. This cycle addressed topics that included big data, artificial intelligence, and sustainable innovation

2022
ZTwenty Two
Geared towards cultivating internal entrepreneurs, innovators, and new thinkers who already possess a mindset capable of supporting Zain's strategic goals

2023
GenZ
Focused on cultivating entrepreneurial mindset that supports Zain's 4WARD strategy

2024
GenZ
Focused on supercharging leadership skills and training for long successful corporate careers

2025
GenZ
2025 focused on preparing graduates to strengthen Zain Kuwait's Digital Factory driving innovation and accelerating the development of customer-centric digital solutions.

ZY Mavericks

A group of highly skilled young professionals who earn specialized certifications to train and mentor their peers through the ZY Learn program. They play an active role in supporting and contributing to a wide range of projects across the organization. In 2025, ZY Mavericks delivered 163 certifications and engaged 58 Mavericks, with a total of 909 learning hours completed. The program introduced new learning paths, including Data Analysis for Decision Making, Cybersecurity, Full-Stack Development, Database Design & SQL, and Advanced AI and Big Data, focusing on building both soft and technical skills.

ZY Learn

An interactive and youth driven training program that focuses on developing both soft and technical skills powered by Mavericks. The initiative aims to bridge skill gaps and equip participants with the capabilities needed to become future leaders within the organization. In 2025, ZY Learn delivered 19 sessions reaching 208 attendees, covering a wide range of topics including Data & AI, Communication, UX & Design, Supply Chain, HR & Leadership, Digital Marketing, and Cloud Computing.

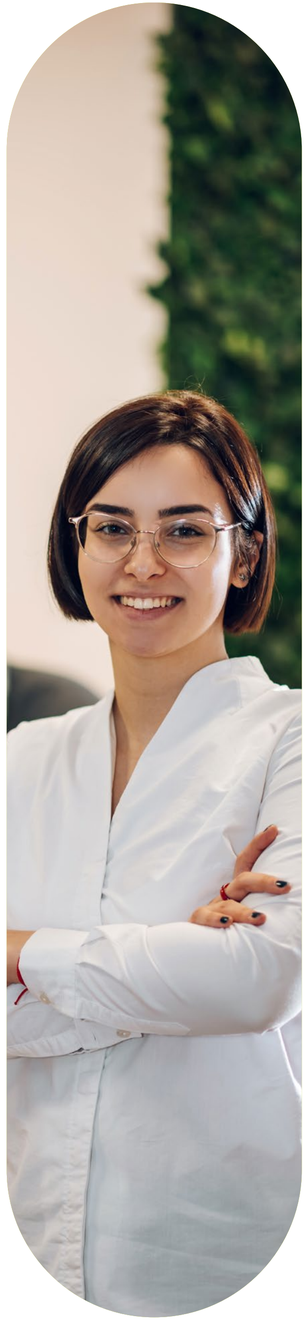
ZY Counsel

A flagship initiative under the ZY pillar, bringing together talented young employees from across Zain to strengthen their strategic thinking and problem-solving capabilities. The Counsel serves as an advisory body, providing innovative insights and recommendations to address key operational challenges presented to each operating company's CEO.

In 2025, 3 masterclasses were conducted with leadership advisories, 5 final presentations made to CEOs, 4 counsels currently in the implementation phase, and 3 counsels in the brainstorming phase.

More information related to Inclusion, Diversity and Equity (IDE) can be found on the Zain group website on the following page: https://zain.com/en/inclusion

To illustrate our people-driven value creation, the table below presents how our employee-related focus areas align with the Integrated Reporting Capitals. Generation Z's Evolution:



To illustrate our people-driven value creation, the table below presents how our employee-related focus areas align with the Integrated Reporting Capitals.

MATERIAL TOPIC
Workforce Management

SUB-TOPIC
Training and Development

RISK
Limited access or misalignment between employee skills and future business needs can result in reduced organizational agility.

OPPORTUNITY
Upskilling programs and development plans strengthen internal capabilities, drive innovation, and enhance the company's ability to adapt to changes in the market.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Investing in career development elevates human capital through stronger competencies and intellectual capital via knowledge creation and innovation. In the short term, it may reduce financial capital due to training costs, but it ultimately increases social and relationship capital through higher engagement and loyalty.



MATERIAL TOPIC
Workforce Management

SUB-TOPIC
Developing local talent

RISK
Limited investment in local workforce capabilities can lead to skills gaps, higher turnover, and reduced long-term sustainability of operations, particularly in markets with nationalization priorities.

OPPORTUNITY
Building programs that foster local talent enhance organizational resilience, reduce recruitment costs over time, and strengthen alignment with national development agendas and localization mandates.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Focusing on local talent development enhances human capital through stronger skills. Social and relationship capital is also developed by fostering trust and credibility with regulators and communities. However, it can initially reduce financial capital due to higher training investments.



MATERIAL TOPIC
Inclusion, Diversity, and Equity

SUB-TOPIC
Addressing the gender gap

RISK
Unequal access to training and leadership opportunities can exacerbate gender disparities, limit innovation potential, and damage the company's reputation regarding inclusivity and fairness.

OPPORTUNITY
Implementing targeted programs that empower women through mentorship, leadership training, and equal access to development opportunities enhances workforce diversity, creativity, and decision-making.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Promoting gender balance strengthens human capital through increased participation and performance, and social and relationship capital by improving stakeholder trust. However, achieving equitable outcomes may require upfront financial capital and time investments to reform structures and systems.



MATERIAL TOPIC
Employee Health and Safety

SUB-TOPIC
Mental Health and Wellbeing

RISK
Neglecting employee mental health can lead to burnout, absenteeism, decreased productivity, and higher turnover rates. It may also expose the company to reputational damage or legal risks related to inadequate workplace support systems.

OPPORTUNITY
Integrating mental health and wellbeing initiatives fosters a supportive culture that enhances engagement, morale, and long-term retention, ultimately improving organizational performance.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS
Prioritizing mental health strengthens human capital through improved well-being and resilience and enhances social and relationship capital by cultivating a caring and empathetic work environment. However, it may initially impact financial capital due to the costs of implementing support programs.



18 Sustainability Agenda

Five Year Achievement

As Zain's five-year Corporate Sustainability (CS) strategy (2020–2025) ends, 2025 represents an important inflection point to reflect on progress made and the way forward. Building on the mission to provide Meaningful Connectivity and the vision to create equitable systemic change, Zain will revamp its sustainability strategy to incorporate key learnings, evolving context, deficits, and challenges of its markets, and align to the direction set by the new '4WARD-Progress with Purpose' corporate strategy. The following section captures the five-year achievements, challenges, and outcomes of each strategic pillar, ensuring that future efforts continue to create long-term value for the business, society, and the environment.

Mission

To provide Meaningful Connectivity leading to equitable systemic change and empower Zain's communities.

Vision

- Safeguard the planet
- Address societal challenges through the core business
- Enable an inclusive digital society
- Build the youth of the future

Strategic Pillars

Climate Change

Decarbonize our business & transition towards net-zero by 2050



Operating Responsibly

Embed ESG across our value chain



Inclusion

Reduce the digital inequality gap



Generation Youth

Build resilience across our communities by targeting 16 million children and youth



Over the past Five years...

2020
- Launched **2020-2025 Sustainability strategy**
- Establishment of the **Climate Action Committee**
- Signatory to the GSMA's Principle for Driving the **Digital Inclusion of Persons with Disabilities**
- Launched three-year group wide partnership with **UNICEF**
- Formulated **Women in Tech** program group-wide
- Added **SASB Framework** to Sustainability Report

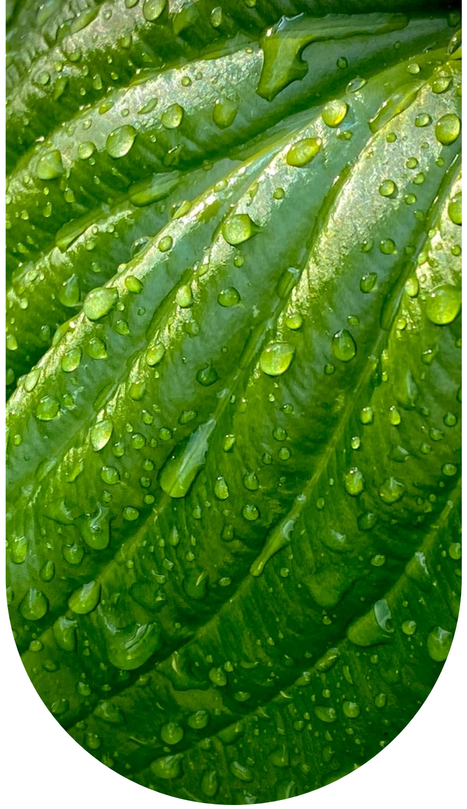
2021
- Launched the **Internet Monsters** online safety awareness campaign for children
- Published its **Supplier Code of Conduct**
- Developed a **Human Rights Policy** statement
- Zain started to measure its **water consumption** across its operations

2022
- Became member of the **UN Global Compact**
- Set **CO_2 emissions reductions** targets from 2022 to 2027 including related financial KPIs
- Committed to the **Science Based Targets** Initiative (SBTi)
- Zain launched a three-year partnership with **Child Helpline International**

2023
- Scaled implementation of **blocking mechanisms of child sexual abuse material** across six operations
- Published its **Waste Management Policy**
- Launched Zain's **Thought Leadership Human Rights Report**

2024
- First company in the region to conduct **reasonable assurance** on scope 1 and 2 emissions and continue limited assurance on remaining indicators
- Launched the Zain Group **Waste Management Compliance Framework**
- Conducted awareness sessions on the **Integrated Thinkings Principles**
- Launched the **Responsible Marketing & Communications Standards and Policy** Statement

2025
- Integrated the **ESG data management platform** to centralize and automate data collection of more than 200 indicators
- Publish **transitionary aspects** embedding integrated thinking principles into Zain's Sustainability Report
- Published **Zain's Climate Transition Plan**



Climate Change

Zain operates across diverse markets in the Middle East and Africa, which are increasingly vulnerable to the impacts of climate change, including rising temperatures, prolonged heatwaves, water scarcity, severe flooding, and unstable energy infrastructure. These conditions place additional strain on network performance, energy consumption, and business continuity, particularly in markets that rely heavily on fossil fuels and face limited access to the grid and renewable energy sources. The rapid growth of data usage, network expansion, and the rollout of energy-intensive technologies such as 5G and data centers further amplify the company's environmental impact. Managing these challenges requires balancing connectivity growth with decarbonization, addressing both physical and transition risks, and ensuring that climate considerations are embedded into business strategy, governance, and risk management processes.

2020
- **Reduced CO_2 emissions by 10% per terabyte of data traffic**, reflecting improved energy efficiency across network operations.
- **Deployed over 1,000 solar-powered base stations** in Jordan, Sudan, and South Sudan, reducing reliance on diesel generators.
- **Achieved 14% energy savings across data centers and network sites** through modernization and optimization initiatives.

2021
- **Upgraded to an A- rating by the CDP in the Climate Change category**, positioning Zain as the highest-ranked telecom operator in the MENA region.
- **Set a near-term target to reduce absolute Scope 1 and Scope 2 GHG emissions by 42% between 2020 and 2030**, aligning with SBTi pathways.

2022
- **Launched a Group-wide Climate Change Compliance Framework**, endorsed by the Board, outlining clear responsibilities and actions toward achieving Net Zero by 2050.
- **Installed solar hybrid systems across more than 400 network sites** in Jordan, Sudan, and Iraq, reducing diesel generator dependence and cutting annual CO_2 emissions by over 3,000 tons.
- **Implemented 57 energy-efficiency initiatives**, including the deployment of hybrid and solar-powered base stations, resulting in measurable reductions in fuel consumption and operational emissions.

2023
- Deployed **338 hybrid energy solutions** across the Group's network sites, reducing dependence on diesel-only generation.
- Migrated **55 sites in South Sudan** from diesel-generated battery hybrids to solar-powered systems, enhancing clean-energy usage in a high-impact footprint.
- Committed to aligning with the Science Based Targets initiative (SBTi) strengthening the company's roadmap towards Net Zero by 2050 and halving emissions by 2030.

2024
- Deployed **242 solar solutions and 96 hybrid battery systems**; connected 123 sites to the grid; and invested over USD 4 million in these initiatives, helping reduce emissions and operational costs.
- Reduced diesel fuel consumption by approximately 7.5% year-on-year across operations, lowering both fuel costs and CO_2 emissions.
- Delivered operating expenditure savings of approximately USD 11.4 million for 2024 by shifting to energy-efficient and low-emission solutions in key markets such as Iraq, Sudan, and South Sudan.

Operating Responsibly

Operating across eight diverse markets where varying regulatory frameworks, supplier maturity levels, and governance standards represents an ongoing challenge to maintaining responsible and ethical business operations. The company must balance rapid digital growth with the need to ensure consistent application of environmental, social, and governance (ESG) principles across its value chain—particularly in supply-chain management. Limited regional oversight frameworks, evolving compliance expectations, and increasing cyber and data security risks further underscore the importance of strong governance, transparency, and integrity. Upholding stakeholder trust requires continuous supplier engagement, capacity building, and close coordination between Group and local teams to embed ethical conduct principles, ensure responsible sourcing, and align with international sustainability standards.

2020

Rolled out the Supplier Self-Assessment Questionnaire (SAQ) to 349 suppliers across Group and local operations, achieving 156 completed responses, which were reviewed and audited by Zain's Corporate Sustainability team to evaluate social and environmental performance.

2021

Delivered ethics and anti-corruption training to over 6,000 employees, achieving full participation from senior management and risk-exposed functions such as procurement and sales.

Integrated human rights, labor, and environmental clauses into 100% of new supplier contracts, reinforcing Zain's governance framework and supplier accountability across its markets.

2022

Reached 504 suppliers across all markets through the supplier self-assessment questionnaire, strengthening visibility into supplier practices and identifying areas for improvement in environmental, labor, and governance standards.

Carried out on-site physical audits for 14 high-risk suppliers, verifying labor conditions, occupational health and safety measures, and human rights compliance as part of the enhanced due diligence process.

Delivered supplier training to 134 vendors through Zain's first digital *Supplier Code of Conduct and Human Rights* video, expanding awareness and capacity-building efforts on responsible sourcing and ethical business practices.

2023

Launched the second supplier training video on human rights and ethical labor practices, reaching **182 suppliers**, marking a 45% increase compared to 2022.

Advanced data privacy awareness by introducing targeted training programs across operations—for example, in Saudi Arabia, **3,093 participants** (subsidiaries, vendors and partners) completed the 'Be aware – Be secure' cybersecurity awareness session.

2024

Achieved 100% compliance with the Group's Code of Conduct training across all operations, reinforcing ethical business behavior and accountability.

Enhanced data privacy and cybersecurity governance, including updated policies, incident-response procedures, and employee awareness programs across eight markets.

Expanded supplier sustainability assessments to cover 78% of active suppliers, evaluating their performance across environmental, labor, and human rights criteria to ensure responsible sourcing and strengthen value chain resilience.

Inclusion:

In the region, digital inequality continues to affect vulnerable groups — including women, youth, persons with disabilities, the elderly, and underserved communities. Despite progress in expanding connectivity, significant barriers persist such as affordability constraints, low digital literacy, limited accessibility standards, access to connectivity and varying cultural and regulatory contexts across markets. Ensuring equitable participation in the digital economy requires Zain to embed inclusion into its products, services, and workplace culture through sustained investment, harmonized strategies, and collaboration with local stakeholders. The company continues to focus on integrating accessibility, gender equity, and diversity across its operations, workforce, and community programs to ensure that no one is left behind.

2020

Launched the 'WE ABLE' disability inclusion initiative across Zain's footprint, laying the groundwork for full-time employees with disabilities and accessible workplace practices.

Embedded inclusion metrics and targets into the Corporate Sustainability Strategy, setting baseline measures for gender-parity and digital-inclusion efforts across markets.

2021

Launched the 'Women in Technology – Bridging the Gender Gap in STEM' initiative and produced a report to support female participation in tech fields that was created by women in the STEM field through surveys and focus groups with target audiences.

Promoted disability inclusion across operations by joining the global #PurpleLightUp movement and enhancing accessibility through initiatives such as accessible branches in Bahrain, priority service cards in Iraq, and sign-language training for over 130 employees across multiple markets.

2022

Transitioned the most material marketing and communications in its operating markets toward being disability-inclusive, aiming for full compliance by 2023 (including closed captions, alt-text, accessible visuals).

Launched inclusive products and services, including the 'Natawasel' sign-language video call center for deaf and hard-of-hearing patients in Bahrain, which now connects 27 health centers and has logged **more than 500 calls** and trained 318 employees in sign-language, awareness, and inclusive customer service in 2022.

Expanded the 'Women in Tech' program, targeting female STEM students (with a goal of **100 mentees per market**).

2023

Trained 88 employees in sign language as part of the 'WE ABLE' disability-inclusion program to strengthen communication with customers and colleagues with hearing impairments.

Employed 70 persons with disabilities across operations and achieved 100% completion of inclusive-hiring training for HR employees to promote equitable recruitment and workplace accessibility.

2024

Reached 550 elderly participants through a dedicated digital skills training program (372 volunteer hours) in Saudi Arabia, as part of the target to address 260,000 elder people by 2025.

Launched the fourth round of the 'Women in Tech' (WiT) program, training 485 women across Kuwait, Bahrain, Iraq, Jordan, and Saudi Arabia.

Trained **161 female university students** in Iraq on data privacy and online safety awareness, under the Inclusion pillar's 'Data Privacy' target for marginalized groups

Generation Youth

Zain operates across the Middle East and Africa, where young people continue to face significant challenges such as high unemployment, limited access to quality education, low digital literacy, and unequal access to connectivity and opportunities. The company recognizes that empowering youth is vital for regional progress and is committed to equipping them with future-ready skills while ensuring their wellbeing and safety online. Across its markets, Zain addresses digital-age risks including exposure to harmful content, cyberbullying, and misinformation, while striving to create safe, inclusive, and accessible digital environments. Delivering these outcomes remains challenging due to diverse socio-economic conditions, varying educational systems, and cultural and regulatory differences across its footprint. To overcome these obstacles, Zain focuses on multi-stakeholder collaboration, localized education initiatives, and scalable digital skills and employability programs that enable young people to participate meaningfully in the digital economy and build resilient futures.

2020

Successfully launched the 'Zain Youth (ZY) Lab' – an innovation-hub initiative engaging **2,150 youth** across five markets in digital skills competitions and mentorship programs.

Partnered with educational institutions to deliver 320 hours of coding and digital literacy training to **1,040 secondary school students**, supporting future employability.

Developed an online safety awareness campaign that reached **1.3 million impressions** across social media channels and included interactive modules on responsible digital use.

2021

Launched the 'Zain Youth (ZY) Initiative' as a Group-wide framework for youth empowerment, aligned with the UN's Sustainable Development Goals, focusing on education, employability, and digital inclusion.

Partnered with UNICEF and other child-protection entities to promote digital wellbeing and online safety through awareness campaigns on cyberbullying, screen time balance, and responsible digital behavior.

Delivered digital skills and entrepreneurship workshops reaching over 11,000 youth across Zain's markets, equipping participants with coding, innovation, and employability skills to enhance career readiness.

2022

Installed blocking mechanisms for child-sexual-abuse material (CSAM) across its networks via partnerships (e.g., Internet Watch Foundation / Project Arachnid), addressing child online-safety under the Generation Youth pillar.

Conducted the 'Internet Monsters' awareness campaign, which reached **7.2 million impressions** across Zain's Group-wide communication channels.

Through education-support partnerships in Sudan, Zain rehabilitated and renovated a school (North Omdurman) supporting approximately **500 students annually** and provided **200 young students with school uniforms**, and **195 students with classroom seating**.

2023

Strengthened child-protection mechanisms through its partnership with Child Helpline International (CHI), expanding helpline reach and building capacity across operations to ensure timely support for children in need.

Expanded digital skills and employability programs in Jordan and Iraq, training over 400 youth through initiatives such as *Mobile Maintenance Training* in Jordan and the *Zain Youth Academy* in Iraq. Both programs were designed to equip young people with technical and entrepreneurial skills that improve their employability.

2024

Launched a regional screen time awareness campaign generating over **43.9 million impressions**, with **82% of respondents** reporting improved understanding of responsible digital use.

Partnered with Saudi Arabia's Ministry of Education to train **700 teachers**, reaching over **28,000 youth** through coding and digital skills sessions.

Trained 1,256 Sudanese youth through a vocational program focused on technical and digital skills, aimed at enhancing employability and resilience among young people in conflict-affected areas.



Before providing an overview of each pillar of the sustainability strategy, the following table provides an overview of each sustainability pillar's key risks and opportunities, and their impacts across the integrated reporting capitals.

MATERIAL TOPIC

Climate Change, Biodiversity and Nature Impact, Natural Capital, Waste Management

SUB-TOPIC

Climate Change

RISK

Physical risks to network and infrastructure from extreme heat, flooding, and water scarcity; increased operational costs from energy price volatility; regulatory and compliance risks linked to evolving climate policies.

OPPORTUNITY

Expansion of renewable energy use, energy-efficient networks, green products and customer solutions; enhanced resilience of infrastructure.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Climate action strengthens natural, intellectual, and social capital by reducing environmental impacts, driving innovation in energy efficiency and renewable solutions, and enhancing community resilience and stakeholder trust. However, the transition requires significant upfront investments in infrastructure and clean technologies, creating short-term pressure on financial capital.

- \+ Natural Capital
- \+ IntellectualCapital
- \+ Social & Relationship Capital
- − Financial Capital

MATERIAL TOPIC

Supply Chain Management, Socioeconomic Compliance, Customer Privacy and Data Security

SUB-TOPIC

Operating Responsibly

RISK

Supplier non-compliance with labor, environmental, and ethical standards; exposure to human rights violations; reputational and regulatory risks; supply disruptions due to weak ESG performance.

OPPORTUNITY

Strengthening supplier audits and ESG integration; enhancing transparency and traceability; building resilient, responsible supply chains; improved access to sustainable procurement and financing.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Responsible supply chain practices strengthen social and relationship, human, and manufactured capital by improving labor standards, supplier trust, and operational reliability. However, enhanced compliance requirements and audits may increase short-term procurement and operational costs, placing pressure on financial capital.

- \+ Social & Relationship Capital
- \+ Human Capital
- \+ Manufactured Capital
- − Financial Capital

MATERIAL TOPIC

Digital Inclusion and Inclusion, Diversity and Equity, Children's Rights

SUB-TOPIC

Inclusion

RISK

Digital divide excluding vulnerable groups; inequality in access to services and employment; reputational risks linked to discrimination; regulatory risks related to accessibility and inclusion standards.

OPPORTUNITY

Strengthening supplier audits and ESG integration; enhancing transparency and traceability; building resilient, responsible supply chains; improved access to sustainable procurement and financing.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Expanding inclusive digital services; empowering women, persons with disabilities, and underserved communities; strengthening workforce diversity; enhancing brand trust and market reach.

- \+ Human Capital
- \+ Social & Relationship Capital
- − Financial Capital

MATERIAL TOPIC

Digital Inclusion and Entrepreneurs and SME Development

SUB-TOPIC

Generation Youth

RISK

Youth unemployment, skills mismatches, and limited access to digital tools; reduced long-term talent pipeline; socioeconomic instability affecting market growth.

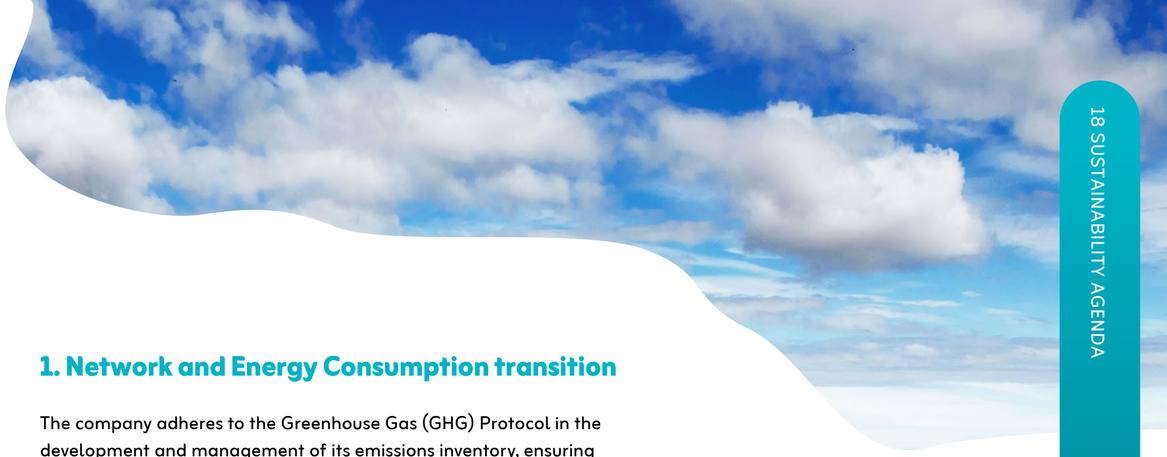
OPPORTUNITY

Developing future-ready digital and entrepreneurial skills; supporting startups and SMEs; driving innovation, job creation, and digital economy growth; building future customer and talent pipelines.

IMPACT ON THE SIX INTEGRATED THINKING CAPITALS

Youth and SME empowerment strengthens intellectual, human, and social and relationship capital by building skills, innovation capacity, and economic participation. However, program funding and capacity-building investments create short-term pressure on financial capital.

- \+ Intellectual Capital
- \+ Human Capital
- \+ Social & Relationship Capital
- − Financial Capital



Climate Change

The challenges posed by climate change in the Middle East and North Africa (MENA) have intensified in recent years, as rising temperatures, severe weather events, water scarcity, and ecosystem degradation continue to affect communities and economies. Addressing these impacts in the MENA region requires an approach that integrates resource management, resilient infrastructure, stronger governance, and multi-stakeholder collaboration, particularly in a context where climate vulnerability remains at an all-time high.

In 2025, Zain continued advancing its climate action agenda as part of its Corporate Sustainability strategy, building on the momentum established over the past five-year cycle. The company sustained progress towards its verified Science Based Targets initiative (SBTi)-approved net-zero goals by expanding renewable energy solutions , implementing further energy-efficiency measures across facilities, and deepening water-risk assessments to strengthen water security across its operations. Efforts to integrate nature and biodiversity considerations into planning and project development also continued, alongside enhancements to waste and water management practices across all markets. A significant development in 2025 was the launch of Zain's Climate Transition Plan, which outlines a practical, phased roadmap for achieving net zero in alignment with global standards and operational realities.

As transparency is central to Zain's reporting, the company maintained its annual CDP disclosure and increased the scope of its CO_2 emissions reporting by implementing reasonable assurance for Scope 1, Scope 2, and Scope 3 emissions, demonstrating its commitment to high-quality, credible, and accountable climate data, making it first in the region in doing so.

Network and Energy Consumption Transition

Strategic Approach and Communications

Waste Management and Circular Economy



1. Network and Energy Consumption transition

The company adheres to the Greenhouse Gas (GHG) Protocol in the development and management of its emissions inventory, ensuring consistency with globally recognized accounting and reporting standards. The Group's emissions reduction pathway established in alignment with the Science Based Targets initiative (SBTi) recommendations, providing a scientifically grounded framework for setting decarbonization targets supporting the transition to a low-carbon future. This approach reinforces Zain's commitment to transparency, accountability, and climate-aligned operational excellence across all Opcos. The emissions reductions reported are in absolute value:

- An annual emissions reduction of no less than 4.2% is required.
- 10 years for near-term target of 42% reduction of scopes 1 and 2 by 2030, and a long-term and Net- Zero target by 2050.
- The emissions inventory encompasses all relevant greenhouse gases, including CO_2, CH_4, N_2O, and HFCs.
- The primary mitigation strategy centers on the deployment of renewable energy solutions, serving as a key driver for reducing operational emissions and advancing the Group's long-term decarbonization objectives.
- Carbon capture and storage (CCS) solutions will be employed as a complementary measure to address and mitigate residual emissions that cannot be eliminated through conventional reduction strategies.

Boundary:

Zain Group includes all operating companies, subsidiaries, and companies under management control within the organizational boundary of its greenhouse gas emissions inventory, ensuring comprehensive and consistent reporting across the entire Group. Within this boundary, emissions associated with tower operations specifically those resulting from the energy consumption of active network equipment are fully accounted for. This applies irrespective of whether the infrastructure is managed through Zain's majority owned TASC Tower entity or through individual operating companies. As such, all tower-related emissions are recognized as the responsibility of Zain Group and are incorporated into the consolidated emissions boundary in accordance with established reporting standards.

Emissions Baseline:

Zain Group initially adopted 2022 as the baseline year for establishing its emissions reduction targets. However, following the Science Based Targets initiative's (SBTi) approval of the Group's science-based targets, the baseline was revised to 2020 to align with SBTi guidance and the broader ICT sectoral decarbonization pathway. This adjustment ensures methodological consistency and strengthens the scientific integrity of Zain's reduction trajectory.

Emissions reductions:

Reductions in CO_2 emissions are calculated based on the type and scale of energy-efficient solutions planned for deployment within each operating entity. These estimates consider the anticipated impact of network growth, including the rollout of new sites and expansions of existing infrastructure. The resulting net emissions reduction is therefore determined by balancing the abatement achieved through efficiency initiatives against the additional emissions generated by network expansion activities.

Targets calculations:

The aggregated net emissions reductions across all operating entities are compared against the established baseline to determine the Group's overall CO_2 emissions reduction target.

Zain's Target:

Zain Group's emissions reduction targets have been formally validated and approved by the Science Based Targets initiative (SBTi) and are articulated as follows:

- **Overall Net-Zero Target:** Zain commits to reach net-zero greenhouse gas emissions across the value chain by 2050..
- **Near-Term Targets:** Zain commits to reduce absolute Scope 1 and 2 GHG emissions by 42% by 2030 from a base year of 2020.
- **Long-Term Target:** Zain commits to reduce absolute Scope 1 and 2 GHG emissions by 90% by 2050 from a base year of 2020.
- Zain also commits to reduce absolute Scope 3 GHG emissions by 90% within the same timeframe.

2020 – 2050 CO_2 Emissions targets for Scope 1 and Scope 2:

Target	Scopes / Targets	2020	2030	2050
Absolute / 1.5°C	Scope 1 emissions (t CO_2e)	401,370.94	232,795.14	52,178.22
	Scope 2 emissions (t CO_2e)	730,328.98	423,590.81	94,942.77
	Scope 1 + Scope 2 emissions (t CO_2e)	1,131,699.92	656,385.96	113,169.99
	Reduction Targets		42.0%	90.0%

CO_2 Emissions Reduction (2020-2025)

Scopes	Base Year (2020)	Reporting Year (2025)	Reduction to Date	% near-term SBT Progress
Scope 1 emissions (tCO_2e)	401,370.94	358,605.16	52,823.78	30.56%
Scope 2 emissions (tCO_2e)	730,328.98	683,974.678	80,943.30	25.19%
Scope 1 & 2 emissions (tCO_2e)	1,131,699.92	1,042,579.84	133,764.28	27%

Bahrain

Zain Bahrain delivered a significant reduction in emissions, exceeding its annual reduction target by **21.85%**, reflecting strong execution across key operational levers. This performance was primarily driven by the **sharing of 36 sites with other mobile network operators (MNOs)**, in addition to the successful connection of 15 sites to the national grid, enhancing overall energy efficiency and reducing reliance on higher-emission power sources.

Furthermore, Zain Bahrain progressed its network optimization efforts by **transitioning 140 indoor sites to outdoor configurations, resulting in an additional annual emissions reduction of 6.84%.** This initiative contributed to lowering energy consumption, particularly by reducing cooling requirements, and improving overall network efficiency.

Iraq

Zain Iraq exceeded its 2025 annual emissions reduction target by **23.47%**, demonstrating strong operational execution and a targeted approach to addressing structural network challenges. This performance was underpinned by strategic interventions to resolve longstanding issues related to aging infrastructure and suboptimal maintenance practices, which had historically contributed to elevated emissions and service inefficiencies.

In partnership with **TASC Towers**, Zain Iraq implemented **590 battery hybrid solutions**, complemented by the deployment of **144 solar–diesel hybrid systems**. These initiatives significantly enhanced energy efficiency, reduced reliance on diesel generation, and improved network reliability. Collectively, these measures delivered a **30.05% reduction in CO_2 emissions**, positioning Zain Iraq as a strong performer in advancing its decarbonization objectives.

Jordan

In 2025, Zain Jordan continued to realize the benefits of the grid decarbonization initiatives implemented in 2023, **with over 86.38% of its electricity consumption sourced from renewable energy** under the green allocation agreement with the local government. This transition has materially strengthened the company's emissions profile and reduced its reliance on conventional energy sources.

In parallel, and in collaboration with **TASC Towers**, Zain Jordan has further advanced power optimization across its **2G, 3G, 4G**, and **5G** networks,

enhancing overall energy efficiency across its mobile infrastructure. These efforts reflect a continued focus on operational efficiency and sustainable network performance.

Kuwait

In 2025, Zain Kuwait, in collaboration with IHS Towers, successfully implemented a series of strategic climate mitigation and energy efficiency initiatives. These included the transfer of 11 sites to the commercial grid, the installation of **121 high-efficiency DC power systems**, the deployment of **88 inverter-based air-conditioning units**, and the **rollout of 70 advanced battery systems**. Collectively, these measures enhanced network resilience, reduced energy consumption, and supported Zain Kuwait's long-term sustainability objectives.

However, Zain Kuwait failed to reach its target of maintaining an increase in emissions of **17.72%** due to the deployment of **a new network layer** to its **5G** infrastructure. Furthermore, Zain Kuwait operates in one of the world's hottest climates and faces the risk of a substantial increase in energy consumption and CO_2 emissions should temperature rise continues. Despite these challenges, the organization remains firmly committed to proactively engaging its key stakeholders. Zain Kuwait is actively initiating dialogue and advocating for regulatory reforms with the local government to accelerate the large-scale deployment of renewable energy solutions. In parallel, the company is exploring strategic opportunities to position itself to benefit from the national transition toward renewable energy in the future.

Saudi Arabia

Zain KSA maintained its emission levels despite encountering several challenges in advancing its climate change mitigation plans, largely due to its reliance on on-grid electricity generated predominantly from conventional fuel and gas sources. This dependence presents a significant barrier to achieving a Net-Zero transition.

In collaboration with Latis, Zain KSA executed several targeted initiatives, including the transfer of **262 sites to the commercial power grid**, the **deployment of 244 battery-hybrid solutions**, and the implementation of 6 solar-hybrid systems. For sites not transitioned under the Latis model, Zain KSA is progressing plans to replace existing shelters with energy-efficient outdoor cabinets, further enhancing energy performance and reducing emissions intensity.

Additionally, the Kingdom's increasingly extreme summer temperatures have contributed to elevated energy demand and associated CO_2 emissions, reinforcing the need for more sustainable and resilient energy solutions. Addressing these structural and environmental challenges will be critical in positioning Zain KSA toward a more efficient, climate-responsible, and future-ready operating model.

Sudan

In 2025, amid the ongoing conflict in Sudan, the national electricity network continued to experience severe disruption due to extensive infrastructure damage and persistent service instability. The country's power supply remained heavily reliant on natural gas, oil, and diesel generation, further constraining energy reliability. Zain Sudan faced significant operational challenges, particularly in the Western region, which was among the most adversely affected. As a result of these combined factors, Zain Sudan was unable to achieve its reduction targets.

In response, and to enhance power stability and operational resilience, Zain Sudan implemented targeted mitigation measures, including the connection of 23 sites to the commercial grid and the **deployment of 1 solar–diesel hybrid system.** These initiatives were critical in improving energy reliability and optimizing consumption across the mobile network, despite the highly constrained operating environment.

South Sudan

Zain South Sudan continued to face significant climate-related challenges throughout 2025, with severe flooding and prolonged heavy rainfall impacting large portions of its network infrastructure. Despite these adverse conditions, the company undertook targeted interventions to mitigate environmental impacts and strengthen energy resilience.

These efforts included the transition of 19 sites to the commercial grid and the deployment of 7 solar systems across diesel-generator hybrid sites. Collectively, these initiatives enhanced network reliability, optimized energy consumption, and supported more sustainable and resilient power operations across the network.

Throughout 2025, Zain achieved **87% of its year-to-date target** (-11% versus a target of -13.07%), reflecting continued progress in the deployment of



energy-efficient solutions across its operating companies. This performance underscores the Group's sustained commitment to operational resilience, cost optimization, and carbon reduction.

These efforts comprised a portfolio of market-specific initiatives, including the deployment of hybrid power systems, expansion of grid connectivity, enhancement of battery technologies, and the integration of renewable energy solutions. Collectively, these measures strengthened network stability, reduced reliance on diesel generation, and delivered measurable progress toward Zain's long-term sustainability and emissions reduction objectives.

Hybrid Solutions Installations

Operating Countries	DG-Battery Hybrid solution	Solar Hybrid solution
Bahrain	2	0
Iraq	404	144
Kuwait	1	0
Saudi Arabia	244	6
Sudan	0	1
South Sudan	0	7
Total	809	

Spending related to CO_2 reduction initiatives – 2025

Initiatives	Total Direct cost (USD)	Total Indirect cost (USD)
Zain sharing Others sites	0	184,900
Others sharing Zain sites	0	0
Outdoor (BTS/Power) solution	765,594	765,594
Small shelters (≤ 2.5m x 2.5m)	0	0
DG-Battery Hybrid solution	2,725,000	0
Smaller size Generators	0	61,201
Solar Hybrid solution	3,775,000	0
Grid Connection	710,812	0
Free Cooling system	115,830	0
Total	8,092,236	1,011,695

Improvements to Energy Efficiency and Site Optimization (units)

Operating Countries	Smaller size Generators	Outdoor (BTS/ Power) solution	Free Cooling Solutions	Grid Connection	Upgrade to more efficient DC Power solution
Bahrain	0	140	0	15	0
Iraq	0	0	0	0	0
Kuwait	10	0	81	11	121
Saudi Arabia	0	0	0	262	0
Sudan	0	0	0	23	0
South Sudan	0	0	0	19	0
Total	10	140	81	330	121

CO_2 Emissions – Scope 1 & 2 / Operation (Sites/ Data Centers/HQ)

Descriptions	Units	Bahrain	Iraq	Jordan	KSA	Kuwait	Sudan	South Sudan
Scope1 - Fuel	Liters	645,834	44,070,480	212,903	45,886,799	12,512,142	21,801,329	3,307,688
Scope 2 - Electricity	KWh	45,490,920	169,812,523	146,537,364	671,591,855	185,346,440	18,062,392	3,550,594
Scope1 emissions	mTon CO_2	2,580.144	122,450.7980	1,339.454	125,295.386	37,983.338	60,091.436	8,864.604
Scope2 emissions	mTon CO_2	31,784.506	112,585.703	7,174.577	410,006.827	113,913.922	5,521.673	2,987.470
Total Scope1 & 2 emissions	mTon CO_2	34,364.650	235,036.501	8,514.031	535,302.214	151,897.260	65,613.109	11,852.074
Baseline-year Decrease / Increase [Year 2020 vs 2025] mTon							-11.37%	

Driving Operational Efficiency: Our Sites (Tower Sharing Program)

Operating Countries	Zain Sharing Others' Sites	Others Sharing Zain's Sites
Bahrain	36	0
Kuwait	5	0

Energy consumption and CO_2 emissions

Descriptions	Units	Total
Scope1 - Fuel	Liters	128,437,175
Scope 2 - Electricity	KWh	1,240,392,088
Scope1 - Fuel	tCO_2e	344,195.088
Scope1 - Refrigerants	tCO_2e	14,409.660
Scope1 emissions	tCO_2e	358,605.160
Scope2 emissions	tCO_2e	683,974.678
Total Scope1 & 2 emissions	tCO_2e	1,042,579.838
Baseline-year 2020 Absolute Decrease/ Increase in Emissions [Year 2020 vs 2025]	%	-11.37%

Notes:

- For the conversion from liters of fuel to KWh, we considered that 1 liter = 3KWh on the basis that 1 liter produces 10KWH with diesel generator efficiency of 30% as recommended by the GSMA
- DG-battery hybrid solutions usually lead to approximately 50% savings on fuel consumption
- Estimate of KWh for solar system is based on the data provided by Zain Jordan as per site monitoring and management solution. 750KWh is produced per site on average.

Scope 3 Emissions:

Category name	Total tCO_2e
Category 1: Purchased goods and services	129,765.35
Category 2: Capital goods	121,439.17
Category 3: Fuel- and energy-related activities (not included in scope 1 or scope 2)	131,336.39
Category 4: Upstream transportation and distribution	556.76
Category 5: Waste generated in operations	11,083.59
Category 6: Business travel	1,182.20
Category 7: Employee commuting	11,390.58
Category 8: Upstream leased assets	87.98
Category 9: Downstream transportation and distribution	11,122.75
Category 10: Processing of sold products	0.00
Category 11: Use of sold products	16,803.95
Category 12: End-of-life treatment of sold products	10,012.17
Category 13: Downstream leased assets	11,435.13
Category 14: Franchises	0.00
Category 15: Investments	24,187.67
TOTAL Scope 3 Emissions	480,403.68
Y-O-Y Change (2024-2025)	-20,814.32 (-4.15%)

2. Strategic Approach & Communications

Climate Change Awareness

The company is dedicated to fighting climate change and using its channels to provide to spread awareness on what our customers can do to address it. To achieve this, Zain set a goal to reach 40% of its customers about climate change by 2025. This commitment aligns with the overall sustainability plan and follows the CDP principles.

Zain continues to launch a variety of campaigns and initiatives across its different markets to position climate change at the forefront and spear dialogue related to climate change and inspire stakeholders to act. To monitor how effective the campaigns are, the organization surveys customers before and after they participate.

Groupwide

This year the company launched a campaign raising awareness on Biodiversity. This campaign centered on the importance of biodiversity and how it is essential to the stability of ecosystems, food systems, and climate resilience. It incorporated regional challenges faced by the loss of biodiversity, with issues such as water scarcity, soil degradation, and desertification.

Through clear educational content, regional storytelling, and locally tailored messages, the campaign demonstrated how the loss of species and habitats disrupts food security, increases climate vulnerability, and weakens natural resilience across all Zain markets. It equipped audiences with practical actions they can take to support conservation efforts, restore local ecosystems, and protect the natural resources their communities depend on.

In 2025, Zain reached over 22 million people through climate and environmental awareness campaigns, addressing key issues including climate emergency response, plastic waste reduction, biodiversity protection, and sustainable consumption across its markets. The table below is a summary of all the campaigns that were conducted in the past 5 years across Zain's operations.

Opco	Summary	Impact
Groupwide	Zain advanced its regional environmental agenda through climate change awareness, waste reduction, biodiversity protection, and impactful storytelling initiatives, engaging millions across its operations.	Board climate & biodiversity training (2022) "Shadows of the Past" cits ampaign launched (2024) Biodiversity Campaign launched (2025) Target: 40 % customer engagement by 2025
Bahrain	Drove national progress in e-waste management and afforestation through strategic partnerships and innovative clean-up technologies.	92,000 people reached (2022) 370 trees planted under "Forever Green" (2022) 13.6 tons of e-waste collected – 100 % recycled (2023) 5.8 tons beach waste removed via solar robot "Bebot" (2023) 47,138 people reached via "Badilna Mannmu" (2024) 100,200 people through 7 campaigns (2025)
Iraq	Zain Iraq focused on environmental awareness and carbon offsetting, engaging millions through nationwide campaigns and large-scale tree planting.	10 M people reached (2022) 1.64 M social media reach (2022) 2,000 palm trees planted (2022), Environmental campaigns reaching 1.1 M (World Environment Day 2023) 850 Acacia trees planted with Hadla Startup (2024) 11.88M people reached through 4 campaigns
Jordan	Strengthened national sustainability through innovation, climate education, and real-time water monitoring technologies.	3.9 M people reached (2022) 2,184 survey participants (2022) First Climate Hackathon launched (2022), 10.3 M reached through campaigns (2023) 13 real-time water monitoring stations installed (2024) 742,301 people reached through 4 campaigns
Kuwait	Continued the "Badilha Bil Zain" campaign, driving behavioral change on waste reduction and sustainable consumption.	Marine waste awareness with Kuwait Dive Team (2022)• 50 893 campaign reach (2023) 18,300 campaign reach (2024)
Saudi Arabia	Reinforced national reforestation and climate-awareness efforts, aligning with Saudi Vision 2030 and the National Green Initiative.	2.23 M people reached (2022) 12,000 trees planted with Green Horizon (2022) EV chargers installed at Granada Business Park serving 5,000 users (2022) Reached 365,800 through 2 campaigns in 2025
Sudan	Last progress made 2022: Sudan animal rescue center and public awareness via SMS and Social campaigns to engage communities on climate risks.	500 seedlings planted & 5,000 L water system donated (2022) 500 volunteers – Port Sudan clean-up (2024)• 130 volunteers reached 3,000 people in White Nile State (2024) 9 Million individuals reached through 11 Bulk SMS alerts with DARAJA, providing critical early warning messages about severe weather.
South Sudan	Focused on public awareness via SMS and social campaigns to engage communities on environmental protection and plastic waste.	1.4 M SMS recipients on World Environment Day (2022) 5,620 people engaged via social campaigns (2023)

ZYxGreenSkills

In 2025, Zain advanced the ZY x Green Skills initiative by strengthening its delivery model and refining its content in response to insights from the 2024 Group-wide survey. Over the year, Zain explored collaboration opportunities with potential partners to support and scale the program across markets. As part of this process, a thorough assessment was carried out to ensure any partnership would meet the required standards of quality, impact, and strategic alignment.

This evaluation period led to a strategic decision to prioritize program refinement over delivery, enabling Zain to revisit the structure of ZY x Green Skills and realign learning pathways with the competencies identified as most critical by youth respondents. The refined content places greater emphasis on green skills where participants previously demonstrated lower familiarity, while continuing to reinforce highly engaged themes such as sustainability, innovation, and environmental responsibility.

Aligned with last year's feedback, Zain operations continued to conduct workshops and awareness sessions in collaboration with local sustainability-focused businesses and influencers. These engagements highlighted the growing importance of green skills and demonstrated how every role has the potential to evolve into a green job. The program also continued to underscore concepts such as circularity, resource efficiency, and the creation of closed-loop systems that reduce waste and support a regenerative economy.

With this strengthened foundation and clearer program direction, ZY x Green Skills is positioned to resume broader implementation next year through a more targeted, scalable, and impact-driven approach across Zain's operations further equipping youth with the skills needed to contribute to more sustainable and resilient communities.

Kuwait

80 participants

In 2025, Zain Kuwait delivered a ZY x Green Skills session on resource efficiency tailored to the local context, alongside a session led by an external expert on green innovation in office environments. The sessions responded to survey insights calling for more practical and locally relevant content and engaged 80 participants.

Jordan

143 participants

Zain Jordan continued to advance climate and environmental awareness and green skills development through targeted internal and external engagements. Internally, two awareness sessions were delivered to approximately 23 employees, covering key topics such as CO_2 emissions and carbon footprint management, led by the Zain Jordan Climate Change Manager, alongside a session on biodiversity and marine life awareness conducted in collaboration with ProjectSea. Externally, Zain Jordan engaged around 120 students from Yarmouk University through an interactive session focused on circular economy principles and waste management practices, providing practical insights into sustainable resource use and responsible consumption.

Biodiversity

Zain recognizes the essential link between healthy climates and ecosystems and digital connectivity, particularly as our operations span some of the most water-scarce and ecologically stressed regions in the world. Biodiversity conservation and nature preservation remain core components of Zain's climate action strategy, reflecting the company's commitment to maintaining ecological balance and supporting thriving biodiversity within the MENA region, where rapid urbanization, habitat degradation, and climate change pose imminent threats. Guided by emerging global nature and biodiversity standards, Zain continues to embed nature considerations into its climate governance and operational planning. This includes integrating biodiversity into the Climate Change Policy, Waste Management Policy, Environmental Standard, Climate Action Transition Plan, Water Management Policy Statement and strengthening environmental due diligence by ensuring biodiversity-related questions into our supply chain management process, reinforcing transparency and accountability across the value chain. As part of internal capacity building, Zain conducted biodiversity and nature-awareness training and continues to raise awareness through internal communications, environmental campaigns, and engagement activities that promote responsible interaction with natural ecosystems.

To safeguard terrestrial ecosystems, Zain applies comprehensive Environmental and Social Management Plans (ESMPs) across site assessment, selection, operation, and maintenance activities. The plan is applicable to all suppliers that are responsible for building Zain's infrastructure. Before deploying any network infrastructure, detailed environmental assessments are conducted to evaluate potential impacts on natural habitats and surrounding communities. Sites located near or within legally protected areas trigger enhanced engagement with local authorities, area sponsors, and community stakeholders to ensure that appropriate conservation measures are implemented. Biodiversity requirements are also embedded into site selection forms, construction procedures, and routine maintenance protocols to minimize ecological risks throughout the infrastructure lifecycle. In 2025, no biodiversity-related risks or breaches were reported across Zain operations.

Zain continues to acknowledge the potential interactions between subsea cable systems and marine biodiversity. Through Zain Omantel International (ZOI), the company works closely with subsea cable consortia to ensure that all planning, installation, and maintenance activities comply with international marine biodiversity protection standards. Robust Environmental Impact Assessments (EIAs) are conducted to identify sensitive marine and nearshore habitats, mitigate risks, and prevent ecological disruption, such as by avoiding critical habitats, adjusting installation timelines to protect breeding seasons, and minimizing underwater noise impacts. ZOI maintains active engagement with environmental authorities and relevant stakeholders, ensuring continuous oversight and alignment with biodiversity protection objectives. Together, these measures reinforce Zain's commitment to protecting both terrestrial and marine ecosystems while advancing sustainable digital connectivity across all markets. In 2025, no biodiversity incidents or non-compliance events were recorded across ZOI's subsea cable operations. In addition, Zain Kuwait continued its 27-year collaboration with the Kuwait Dive Team to protect marine ecosystems. Activities included reef monitoring and large-scale marine waste removal. Coral health monitoring was supported in collaboration with CoralWatch, a global citizen science program run by the University of Queensland. During 2025, 127,000 kg of Marine Waste was removed.





Waste Management

In 2023, Zain Group introduced a comprehensive Waste Management Policy aimed at eliminating all forms of waste, including electronic, plastic, wood, and paper waste, by 2030. The policy applies to all Zain operations, subsidiaries, and entities under the Group's management control. This direction aligns with Zain's Climate Change Compliance Framework, approved by the Board of Directors, ensuring the structured and consistent implementation of waste reduction initiatives. The approach supports Zain's broader ambition to achieve net-zero emissions by 2050 and to minimize value chain impacts on communities, ecosystems, and biodiversity. Last year, Zain launched a Board-approved Waste Management Compliance Framework that outlines how the policy needs to implemented where it integrates best-practice waste management requirements into the design, deployment, and operation of its infrastructure. The framework is underpinned by robust internal controls, detailed procedures, and clearly established KPIs to ensure effective oversight and implementation across all operations.

In 2025, Zain initiated a comprehensive data-collection process across all operations to quantify the different types of waste generated within the company. This marks the first step toward establishing a Group-wide waste baseline, which will serve as a foundation for setting measurable reduction and elimination targets.

By mapping waste streams and identifying key sources across facilities and business activities, Zain aims to enhance visibility, improve tracking, and ensure accountability in its waste management performance. The baseline will guide the development of future goals and initiatives aligned with the company's ambition to eliminate all forms of waste by 2030.

Building on this foundation, the company launched several initiatives to manage and reduce different waste streams across its footprint, reinforcing its commitment to circularity and ecosystem preservation.

Through partnerships and innovation, the company continues to make tangible progress toward its 2030 waste elimination targets.

2025
Implementation of the framework groupwide embedding clearly identified internal control mechanisms to track and monitor waste

2024
Creation of Waste Management Compliance Framework with roles clearly defined and approved by the board

2023
Creation of Waste Management Policy

Waste Reduction Initiatives across Zain's Operations:

Zain Kuwait - MoU with TadwiRe

In 2025, Zain Kuwait continued to advance its sustainability agenda through a range of waste management initiatives, supported by its ongoing partnership with TadwiRe, Kuwait's first recycling facility of its kind.

Alongside its established e-waste collection system, the company introduced a new metal waste collection stream to further strengthen responsible disposal practices and broaden its contribution to circular resource management. These efforts reflect Zain Kuwait's commitment to minimizing environmental impact and enhancing waste segregation across its operations.

Plastic (PET) Waste Reduction:	**Paper/OCC Waste Reduction**	**Metal Waste Collection (New Category):**	**E – Waste:**
Collected: 1,142 KGs	Collected: 13,164 KGs	Collected: 125 KGs	26 KGs

Zain Bahrain

Plastic Reduction:

Through a dedicated plastic waste management campaign, Zain Bahrain successfully recycled 331 KG of plastic since the initiative's inception. What began as a ZAINIAC idea through a plastic recycling competition, the initiative evolved into a structured program led by the Corporate Sustainability team, supported by 14 dedicated collection bins across the premises. Once filled, the bins are transferred to the basement, where a certified recycling partner weighs and processes the collected materials, ensuring responsible disposal and circularity.

Paper Reduction Campaign:

As part of Zain Bahrain's strategy to eliminate waste across its headquarters, the company instituted a paper-reduction initiative designed to minimize paper consumption and enhance operational efficiency through a structured four-stage process. In 2025, Zain Bahrain continued to advance this program, reinforcing its commitment to digitalization and further embedding paper-efficient practices throughout its operations. The paper reduction campaign brings together cross-department stakeholders, legal and risk teams, and a third-party recycling partner to responsibly clear inherited paper waste by ensuring that all disposed of papers are responsibly audited and recycled. Since inception, over 38,000 kg of paper have been collected, including 100kg in 2025.

Zain Jordan - Refurbished Devices Initiative

Zain Jordan continues to advance its waste management and circular economy efforts through the Refurbished Devices Initiative, which focuses on extending the lifecycle of Home Internet equipment and reducing electronic waste across its operations. The program follows a structured end-to-end process collecting returned devices from shops, transferring them to the central warehouse, restoring them through technical testing and refurbishment, and redistributing them for resale or replacement. To date, the initiative has successfully refurbished 6,670 devices, demonstrated its strong environmental, operational, and financial impact and reinforced Zain Jordan's commitment to responsible waste management and sustainable business practices.

Water Management:

Each of Zain's operating markets continues to face distinct climate and water-related weather challenges. In 2025, Zain strengthened its water efforts through the approval and publication of its Water Management Policy Statement approved by the Zain Group Board of Directors. This policy formalizes the company's commitment to responsible water use across its facilities, infrastructure and value chain, and recognizes the broader regional risks that water scarcity poses, including displacement, food insecurity, and potential conflict. The new policy was followed by the development of a comprehensive Water Management Plan to guide implementation across all operations.

Governance of water-related matters is overseen by the Climate Action Committee which includes members of Executive Management and reports directly to the Board. The Committee is responsible for setting strategic goals and KPIs, establishing baselines for direct and value chain water use, identifying risks and opportunities across short, medium, and long-term horizons, and ensuring that all water management approaches receive appropriate board-level review and approval. This structured and tailored approach enables Zain to develop realistic and site-specific water efficiency targets, including time-bound goals for markets operating under severe water stress.

During the reporting period, Zain conducted detailed assessments to establish accurate water consumption baselines across its markets. Kuwait, Bahrain, Iraq, Jordan, KSA, Oman, and UAE remain classified as extremely highly water stressed according to global indicators such as the World Resources Institute Water stress index, where overall demands exceed the available supply. Sudan, and South Sudan are categorized as moderately or less stress requiring ongoing but flexible conservation measures to ensure responsible water use.

Given the low water intensity of Zain's operations, which primarily involve office-based activities, large recycling and rainwater harvesting remain impractical in arid markets due to climatic conditions and infrastructure limitations. Instead, Zain continued to strengthen conservation measures that were introduced in previous years. These include the continued use and maintenance of previously deployed solutions across operations, such as smart water faucets, optimization of WC flush systems and the implementation of operational guidelines governing water usage.

Zain continues to align its broader water efforts with international guidance from the UN Convention to Combat Desertification, the World Water Council, the International Drought Resilience Alliance, the United Nations Sustainable Development Goals, the World Meteorological Organization, and the United Nations Environment Program.

To strengthen governance, accountability and the group's long-term approach to water, the company initiated the process to establish a group wide water baseline basement, aiming to accurately quantify water consumption across all operations, and establish a consistent methodology for data collection, and identify key areas for improvement. The baseline is to be finalized by the end of Q2 2

	Bahrain	Iraq	Jordan	Kuwait	Saudi Arabia	Sudan	South Sudan
Total Water Consumption in m^3 in 2025	10,743	14,045	6,547	8,488	9,486	N/A	4,730
Total area of operational Headquarters (m^2)	16,761	67,696	27,930	16,662	28,675	N/A	8,000
Total Consumption in 2025 (m^3)	54,039						
Y-o-Y Reduction (%)	11.3%						
Y-o-Y Reduction (m3)	6,879						

Operating Responsibly

This strategic pillar is dedicated to integrating Environmental, Social, and Governance (ESG) principles throughout Zain's value chain. It is anchored around three core priorities:

1. Ensuring robust disclosure and transparency in reporting how Zain delivers value in the ESG domain.
2. Upholding stringent responsible supply chain management to embed ethical practices, enforce standards, and mitigate risks across the value chain.
3. Maintaining a strong commitment to data privacy to protect all stakeholders — particularly vulnerable groups such as the elderly, women, youth, and migrant workers.

Through these efforts, the company aims to strengthen trust, create value, and set a benchmark in ethical business conduct, transparency, and operating beyond regulatory compliance.

Disclosure and Reporting

Zain monitors the progress of the targets set in its sustainability strategy through its business plans, operational reviews, quarterly meetings, and other stakeholder engagement mechanisms.

In 2025, the company migrated its sustainability KPIs onto a sustainability data monitoring cloud solution to help the company, track, manage and report on ESG metrics effectively. To ensure proper integration and enhance the quality of ESG standards, Zain implemented the following measures:

- Aligned and finalized over 200 KPIs across all relevant functions to ensure full adherence to recognized standards.
- Delivered targeted training sessions (both online and offline) to build internal capability and alignment.
- Identified key stakeholders and defined approval hierarchies to establish structured quality control protocols.
- Onboarded all relevant departments and subsidiaries to ensure consistent application across the Group.
- Implemented a controlled data governance process where data inputters submit data, data approvers review and sign off, and any feedback or amendments are fully tracked to maintain audit readiness.
- Established a tiered review flow, whereby data is validated at the operational level, then by the responsible Group function, and finally undergoes a comprehensive review and approval by Group Sustainability to ensure accuracy and consistency.

This year, Zain also reinforced its commitment to transparency by extending reasonable assurance to its Scope 3 emissions, in addition to the continued assurance of Scope 1 and Scope 2 emissions. The assurance letter is available on page 141 of this report.

Responsible Supply Chain

Target for 2025

To ensure all active suppliers complete the self-assessment questionnaire and watch the supplier training video and align to Zain's policies and material active supplier undergo a physical audit.

Zain's Response

Zain adopted a robust supply chain management strategy designed to identify and mitigate sustainability risks while ensuring that all suppliers comply with its ESG and supply chain standards. This approach fosters responsible practices across the value chain and helps minimize reputational and human rights risks. In addition, the company prioritizes strengthening its local supply chain to support economic growth and build supplier resilience. By consistently tracking and evaluating its engagement with local suppliers in each market, Zain demonstrated its ongoing commitment to maintaining a stable and sustainable supply chain.

Zain's supply chain management framework rigorously evaluates suppliers to ensure alignment with its values and standards. Through comprehensive assessments covering ethics, sustainability, and compliance, the company partners with suppliers committed to responsible practices. This proactive approach to safeguard operations strengthens Zain's dedication to a sustainable, value-driven supply chain.

Zain continued to hold its annual Supply Chain Management Forum for its fifth consecutive year, where the procurement and sustainability teams from each operation gathered to discuss lessons learnt and challenges faced the previous year. The forum emphasized hearing directly from on-ground teams to better understand their interactions with suppliers, streamline processes, and enhance the accuracy of supplier information and assessments. More than 32 participants attended the forum, where discussions focused on 2024 lessons learned, supply chain process documentation, defining active suppliers, commitment to policies, supplier self-assessment questionnaires, physical audits, supplier training, the Waste Management Compliance Framework, and the Data Automation Platform.

This year, Zain enhanced its supply chain management approach based on feedback received during the forum. The supplier self-assessment questionnaire was shortened to make it more efficient while maintaining the same standards, resulting in a higher response rate. The observation form was also clarified and made more stringent, requiring all participants to sign even when no observations were made. A comprehensive Supply Chain Process Document was developed to serve as a reference guide for current and new team members, ensuring consistency and continuity. In addition, procurement teams migrated to a cloud-based platform to input sustainability KPIs, improving data accessibility and automation. The supplier training program, previously centralized at the Group level, was cascaded to each operation, empowering local teams to oversee participation and follow up directly with suppliers who had not completed the training, significantly streamlined the process and improved accountability.

Topics covered in Supplier Self-Assessment Questionnaire include:

- Workforce Profile: Covers employee demographics, including gender representation and inclusion of people with disabilities.
- Environment: Encompasses health and safety practices, employee training, energy use, packaging, waste and raw material management, as well as newly integrated elements such as net-zero targets, biodiversity, and traceability.
- Social: Evaluates adherence to labor and human rights standards, including policies on child labor, fair compensation, and non-discrimination.
- Security: Reviews of how suppliers manage external security contracts when such services are required.
- Governance: Assesses stakeholder engagement, accountability, grievance mechanisms, transparency, and reporting practices.
- Information Security: Examines the systems and governance structures in place to protect data and ensure information security.
- Conflict Minerals: Evaluates the sourcing and use of conflict minerals within supplier operations.

Zain Supply Chain Management Process

Adhere to Zain's supplier Code of Conduct and Human Rights policy statement

Complete Zain's training video available on the website and complete feedback form

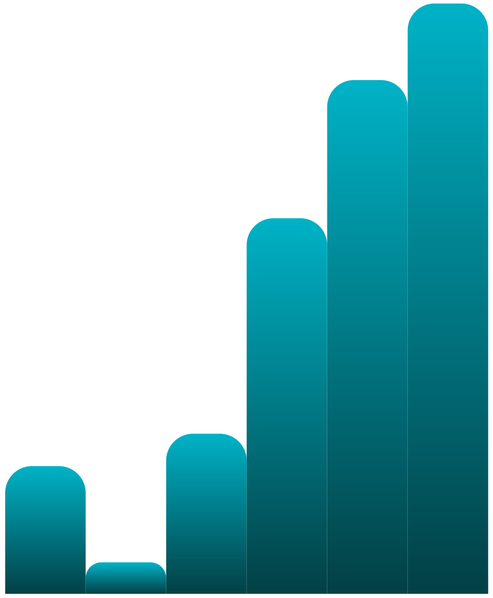
Complete Zain's self-assessment questionnaire

Complete physical audit for high-risk supllers

- Supplier Code of Conduct and Human Rights Policy Statements: These documents continue to be accessible in both Arabic and English on the Zain Group website.
- Supplier Training: Building on the success of previous years, Zain transitioned supplier training delivery from a centralized Group function to each operation, enabling local teams to directly manage participation and follow-up. Based on the company's materiality assessment topics, Zain is developing its fourth training module, which will focus on data privacy.
- Supplier Self-Assessment Questionnaire (SAQ): In 2025, Zain streamlined the SAQ to make it more efficient while maintaining its standards.
- Physical Audits: Zain continued to conduct the physical audits, where a more stringent validation process was introduced, requiring all teams to sign the observation form even when no findings were reported, ensuring full accountability.

Operation	Number of Suppliers Target	Percentage achieved	Number of Suppliers Completion
Bahrain	100% of Active Suppliers in 2025	59%	71
Iraq		91%	50
Jordan		84%	307
Kuwait		58%	110
Saudi Arabia		51%	95
Sudan*		10%	21
South Sudan		6%	6
Total			660

Progression of Supplier Self-Assessment Questionnaire



**Sudans numbers are impacted due to the conflict.*

*** In 2021, Zain adopted a phased approach focusing on Bahrain and Group suppliers to refine the self-assessment process, which led to deeper insights but a lower overall response rate.*

Operation	Target of Number of Suppliers	Completed	Number of observations raised	If observation raised, which category does it fall under: Labor Rights, Human rights, Climate-related
Bahrain	10	10	No observations were raised	N/A
Iraq	10	10	No observations were raised	N/A
Jordan	10	11	8 of low and medium materiality	Health and Safety, Risk Assessment
Kuwait	10	10	No observations were raised	N/A
Saudi Arabia	10	12	4 of low and medium materiality	Health and Safety, Business Continuity Plan
Sudan*	10	N/A	N/A	N/A
South Sudan	10	N/A	N/A	N/A

**Due to political instability, Zain Sudan was unable to conduct on-site, physical audits*

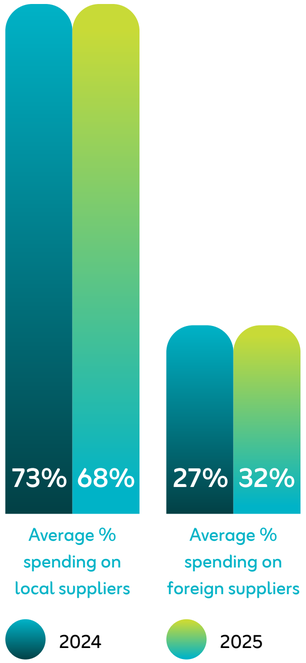
Procurement Spending

In 2025, Zain continued to track its annual spending on local versus foreign suppliers to assess its contribution to local economies. Compared to 2024, the company decreased its expenditure with local suppliers across the following markets: Iraq, Jordan, and South Sudan, reflecting its ongoing commitment to strengthening local supply chains and enhancing supplier resilience.

2025 Procurement Spending Per Operation

Operation	% Spending on Local Suppliers	% Spending on Foreign Suppliers
Bahrain	51%	49%
Iraq	36%	64%
Jordan	63%	37%
Kuwait	54%	46%
Saudi Arabia	96%	4%
Sudan*	90%	10%
South Sudan	86%	14%
Total	68%	32%

The graph below illustrates Zain Group's procurement spending for local vs. foreign suppliers for 2025 as compared to 2024.



Data Privacy

Target for 2025

Educate marginalized communities by creating a data privacy and protection training program by 2025

Zain's Response

Throughout the year, each of Zain's operations finalized its plan on data privacy programs and identified the target segment. Sudan could not finalize its plan due to the ongoing civil unrest in the country.

OPERATION

Bahrain

TARGET SEGMENT

Elderly Community

PROGRESSION IN 2025

Zain Bahrain, in collaboration with its fintech arm Bede, hosted a financial literacy session for members of the Al Hekma Retired Society. The session introduced participants to the concept of micro-loans and guided them on managing personal finances through digital platforms. A total of 80 retirees attended the session, which aimed to strengthen their understanding of safe digital financial practices and promote financial inclusion among the elderly community.

OPERATION

Iraq

TARGET SEGMENT

Students

PROGRESSION IN 2025

In 2025, Zain Iraq hosted a series of data privacy awareness sessions targeting Al Nahrain university students, reaching a total of 335 participants. Topics included:

- How to protect personal information online
- Understanding data protection regulations
- Risks associated with data breaches
- Practical steps to secure their digital presence and maintain confidentiality

OPERATION

Jordan

TARGET SEGMENT

Refugee Youth

PROGRESSION IN 2025

In 2025, Zain Jordan continued its partnership with Al-Amaal Center through the T-Talk Initiative at the Jerash (Gaza) Refugee Camp, empowering refugee youth through digital and cultural exchange. Using Zain's high-speed internet, participants engaged in live virtual dialogues with university students in the U.S., Canada, and Europe, enhancing English fluency, digital literacy skills such as responsible digital engagement, digital communication and cross-cultural understanding. The program delivered 300 interactive sessions, training 27 youth (23 females, 4 males) and reaching 4,222 beneficiaries from a camp population of 33,679 residents. Zain's internet support enabled continuous online learning that strengthened participants' digital literacy and enhanced their employability.

OPERATION

Kuwait

TARGET SEGMENT

Humble Expat Workers

PROGRESSION IN 2025

In 2025, Zain Kuwait expanded its data privacy awareness program through three sessions two for security staff and one for cleaning and hospitality staff to strengthen digital inclusion among third-party personnel. The sessions featured translated materials, task-specific content, and local cybersecurity insights, with participants receiving certificates of completion. A total of 94 participants attended and engaged in these sessions, 94% reported greater confidence in protecting their data, and 85% expressed interest in future sessions.

Inclusion

Under the Inclusion pillar of its Corporate Sustainability strategy, Zain is committed to bridging the digital divide between vulnerable segments such as the elderly, people with disabilities, women, and children. Across the Middle East and North Africa (MENA) region, digital inclusion continues to face challenges related to unequal access to connectivity, affordability barriers, limited digital literacy, and a gender gap in technology adoption, with women and marginalized groups often under-represented in the digital economy.

Zain recognizes the critical role its services play in promoting equitable participation in the digital economy. The company is focused on expanding network accessibility, improving digital literacy, and reducing affordability barriers, particularly for underserved groups. By embedding inclusion into its programs and service delivery, Zain aims to build digital capabilities across its markets

Under its inclusion pillar, Zain focuses on the following segments:

Elderly community

People with disabilities

Women in technology

Elderly Community

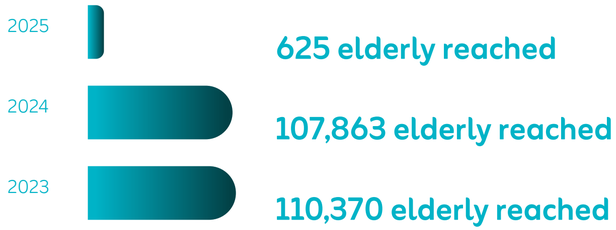
Target:
Address 260,000 elderly people across Zain's footprint by 2025 through tailored products, services, marketing campaigns, and benefits.

The elderly population across the MENA region is growing rapidly, with some countries projected to have over 30% of their population aged 60 and above by 2050, highlighting the need to enhance digital accessibility, literacy, and safety for older adults. Many people from the elderly community continue to face challenges such as limited access to technology, low confidence in using digital tools, and vulnerability to online scams and misinformation, restricting their ability to fully benefit from digital services and maintain social connections.

According to Morgan Stanley's report "Cyber Security for Seniors: A Guide for Loved Ones", while seniors are increasingly engaging with online platforms, limited awareness of cybersecurity practices leaves them exposed to digital threats.

Recognizing these challenges, Zain continues to focus on digital inclusion for the elderly, providing the tools, training, and awareness necessary to help them navigate the digital world safely and confidently. Since 2022, four out of seven Zain operations have launched initiatives aimed at empowering the elderly through digital literacy, online safety, and locally tailored community sessions.

To date, Zain has reached a total of 218,233 elderly individuals through its initiatives:



Remaining to target: 41,767 elderly to be reached to achieve the five-year goal of 260,000

The following highlights the initiatives conducted throughout the year:

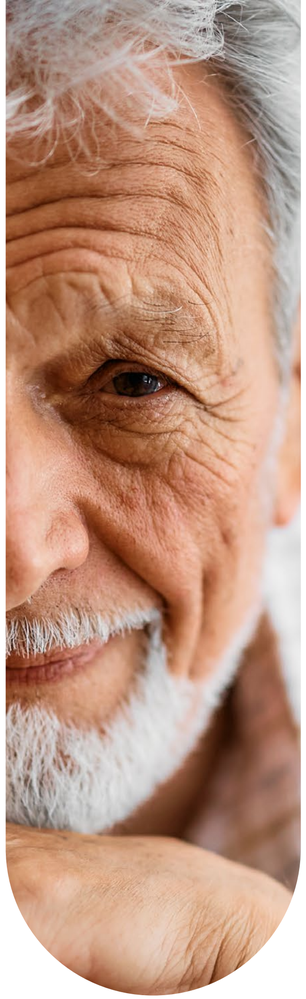
Zain Bahrain: In 2025, Bede, Zain Bahrain's Fintech arm expanded its outreach to elderly communities through a partnership with Al-Hekma Society. The collaboration enabled direct engagement with retirees and strengthened service accessibility. A total of 80 seniors participated, helping advance digital and financial inclusion by improving the ease, safety, and usability of essential services.

Zain Iraq: Zain Iraq hosted 30 older adults at its headquarters for a hands-on session on mobile and social media applications to help them stay connected with their families. The visit also included 42 orphaned children and concluded with a group lunch that encouraged positive community interaction across generations. In parallel, and in recognition of World Elder Abuse Awareness Day, Zain Iraq launched a social media campaign highlighting the challenges faced by older adults. The campaign reached over 1.3 million users, raising public awareness and strengthening understanding of their needs.

Zain Kuwait: In 2025, Zain Kuwait conducted cybersecurity awareness sessions for 15 participants, all of whom were parents of Zain employees, as part of the 'You Are the Blessing' initiative. The event also featured a dedicated health and wellness talk delivered by a medical expert, providing participants with valuable insights to support their overall wellbeing.

Zain South Sudan: The program delivered practical digital literacy training to 140 elderly participants (60 women and 80 men) in remote villages, covering basic mobile functions, internet use, and mobile money applications to help them stay connected and access essential services. To improve digital access, 120 solar power banks were procured for distribution. The engagement also increased awareness of Zain's products and services, contributing to stronger customer loyalty and additional sales during community outreach activities.

Additionally, 500 elderly individuals (300 women and 200 men) were registered for the upcoming distribution of solar power solutions aimed at addressing power outages in Protection of Civilian camps and remote villages. This initiative will further enhance their ability to charge mobile devices and access essential digital services.





People with disabilities

Target:
Launch core data bundles and packages in 2023 for people with disabilities

Based on a report published by PwC titled: The State of Digital Inclusion in the MENA Region, approximately 15% of the MENA region's population is disabled. As the world continues to move towards fully digital economies, it is vital to ensure such segments are not left behind. The GSMA presents mobile operators with a framework that aims to provide a basis for increasing digital inclusion among people with disabilities:

1. Understand the context and gather needed data
2. Integrating disability inclusion in relevant policies
3. Working cross functionally with other entities using a multi stakeholder approach
4. Addressing the barriers

Based on the framework highlighted above, Zain ensures that it holistically assesses the challenges and needs of this segment and addresses each point. Targeting this demographic in a meaningful way generates value for the company by meeting regulatory requirements such as in Kuwait and KSA, in which the company must ensure that it provides a core bundle/service for this segment. Providing assistive technologies also boosts innovative approaches to providing products and services to an untapped market.

The table below highlights each market's progress in providing core services to the disabled community:

OPERATION
Bahrain
BUNDLES YES OR NO
Yes
DATA SERVICES FOR PWDS
In collaboration with Primary Health Care and the Bahrain Deaf Society, Zain Bahrain maintained its commitment to Natawasal, the pioneering health video call center specifically designed for the deaf community in Bahrain. Originally launched in 2023, this initiative was developed to address the unique healthcare needs of deaf and hard-of-hearing individuals, ensuring they receive accurate medical diagnoses and appropriate treatment from their healthcare providers. The video call center connects 27 health centers across the Kingdom, providing vital communication support that bridges the gap between healthcare professionals and patients with hearing impairments.

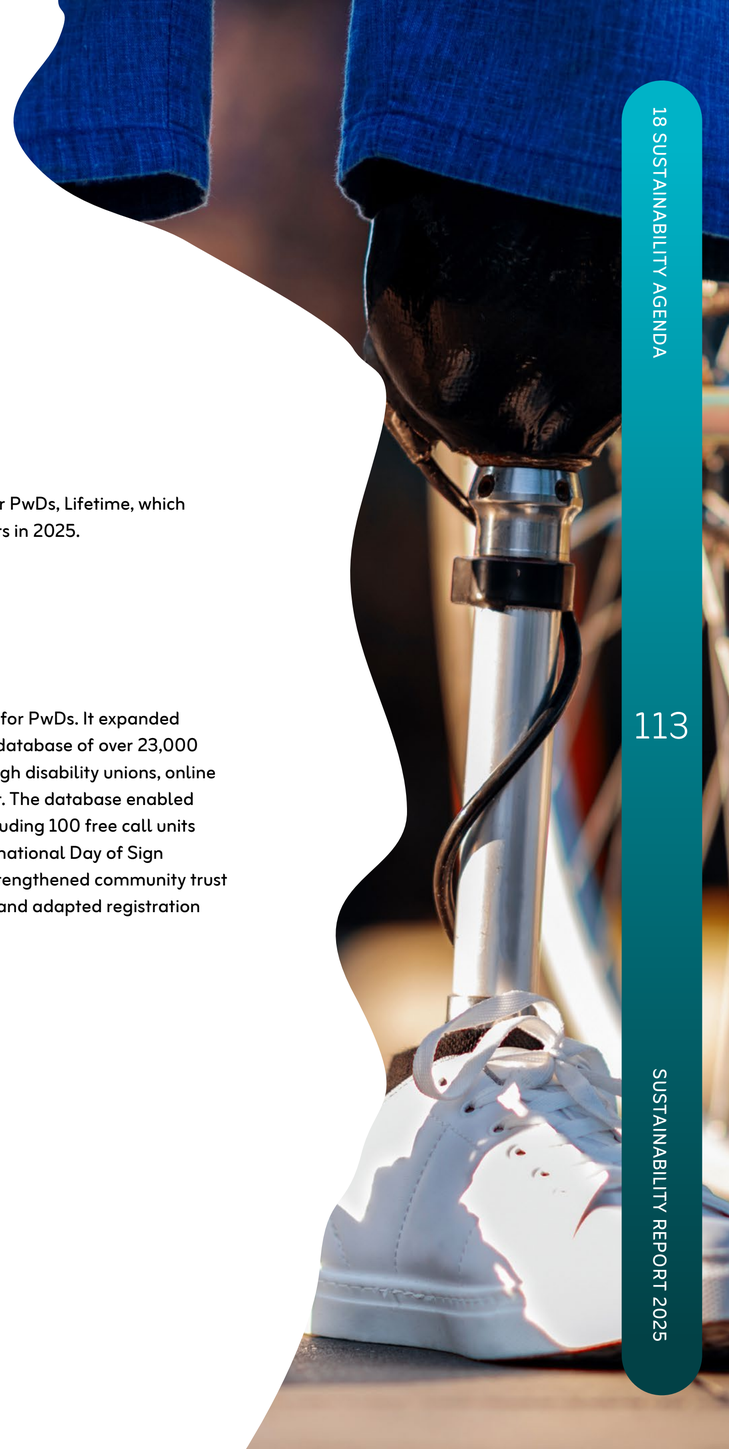
OPERATION
Iraq
BUNDLES YES OR NO
No
DATA SERVICES FOR PWDS
Due to a lack of data and country-wide statistics, Zain Iraq did not launch any bundles specified for persons with disabilities (PwDs). To circumvent this challenge, the company provided other services that support this community in accessing its digital products and services. This year, Zain Iraq provided support to 94 students with visual impairments by offering them a monthly 10GB data bundle. This initiative was designed to facilitate their access to educational lectures on YouTube and Zoom, aiding them in their preparation for school exams.

Additionally, a total of 36 participants completed the Harvard CS50p program, gaining foundational skills in Python, HTML, CSS, and Flask. Delivered in partnership with Computiq and in collaboration with the Ministry of Labor and Social Affairs, the initiative aims to equip PwDs with recognized digital qualifications that enhance their employment opportunities in the technology sector.

OPERATION
Jordan
BUNDLES YES OR NO
Yes
DATA SERVICES FOR PWDS
In 2025, Zain Jordan continued its Basma+ Line, providing 317 customers with hearing impairments access to discounted communication services and dedicated customer support, helping reduce communication barriers for vulnerable segments. To further enhance inclusivity, a partnership with Royal Jordanian Airlines introduced tablets across seven airport counters to support passengers with hearing impairments.

OPERATION
KSA
BUNDLES YES OR NO
Yes
DATA SERVICES FOR PWDS
Zain KSA continues to promote its core bundle for PwDs, Lifetime, which provides 50% discount. It counted 840 subscribers in 2025.

OPERATION
Sudan
BUNDLES YES OR NO
No
DATA SERVICES FOR PWDS
Zain Sudan did not launch any bundles specified for PwDs. It expanded its PWD inclusion initiative by creating a verified database of over 23,000 registered PWD mobile numbers, collected through disability unions, online forms, shop registrations, and WhatsApp support. The database enabled targeted communication and tailored offers, including 100 free call units provided to all registered individuals on the International Day of Sign Languages. Partnerships with disability unions strengthened community trust and improved accessibility through trained staff and adapted registration channels.



Target:
Embed the GSMA's "Principles for Driving the Digital Inclusion of Persons with Disabilities" by 2025

Since 2020, Zain continues to be signatory of the GSMA's Principles for Driving the Digital Inclusion of Persons with Disabilities. Zain recognizes the importance of digital inclusion and is committed to integrating it throughout its value chain. As a signatory to the principles, Zain is committed to the following:

1. Embrace disability inclusion at every level of the organization
2. Understand how to reach and better serve persons with disabilities
3. Deliver inclusive products and services that meet the diverse requirements of persons with disabilities

The company addresses the principles through following actions:

PRINCIPLE

Principle 1: Embrace disability inclusion at every level of the organization

ACTION TAKEN

The company established an internal program disability inclusion initiative, WE ABLE, launched in 2019. The program aims at embedding disability inclusive practices in the company by 2025. More information on the initiative can be found on page 92.

PRINCIPLE

Principle 2: Understand how to reach and better serve persons with disabilities

ACTION TAKEN

Under the WE ABLE initiative, the company continued a Group-wide social media campaign "Be My Eyes."

The aim of the campaign was to immerse the audience in the daily experiences of a blind person as one of Zain's people with disabilities target segment.

The campaign raised awareness and ultimately drove meaningful changes in behavior and processes that affect people with visual impairments. By providing a first-person perspective on the challenges and triumphs of navigating a world designed for the sighted, the campaign aimed to challenge preconceived notions and encourage more inclusive practices across various sectors.

More details on this campaign can be found on Page 92.

PRINCIPLE

Principle 3: Deliver inclusive products and services that meet the diverse requirements of persons with disabilities

ACTION TAKEN

Given that the company operates in eight distinct markets, each with unique challenges and requirements related to PwDs, each operation developed a tailored bundle to address the specific needs of its respective market.

More information on the PwD bundles that Zain offers to its customers can be found on page 113.

Women in Technology

2025 Target:
To mentor 200 female university students pursuing STEM disciplines in each operating market.

Zain established the Women in Tech (WiT) program in 2020 to address the persistent under-representation of women in STEM (Science, Technology, Engineering, and Mathematics) fields across the MENA region. UNESCO continues to highlight that women make up only 40% of the STEM workforce across the region, underscoring the need for sustained, scalable programs that provide mentorship, exposure, and support for women to enter and thrive in STEM careers.

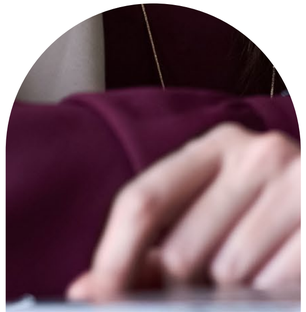
The Global Gender Gap Report 2025 indicates that this statistic now stands at 68.8%, reflecting only marginal progress (+0.3 percentage points) compared to 2024. The report highlights improved performance in Political Empowerment and Economic Participation & Opportunity, yet significant disparities remain in the global labor market, including STEM fields.

The report provides STEM graduate ratios for only three of Zain's nine markets of presence, highlighting the need for improved data transparency. Strengthening insights across all operating markets will support more targeted interventions and ensure effective program delivery.

STEM Graduate Gender Ratios in Zain Markets

Country	% Female STEM Graduates	% Male STEM Graduates
Kuwait	Not available	Not available
Bahrain	41%	59%
Iraq	Not available	Not available
Jordan	Not available	Not available
Oman	Not available	Not available
Saudi Arabia	37%	63%
Sudan	Not available	Not available
South Sudan	Not available	Not available
UAE	41%	59%





Women in Tech (WiT):

In 2025, Zain continued to expand and strengthen its flagship WiT program, building on the foundations established in previous years. The program's core objective remains to introduce recent female graduates to diverse STEM-related career pathways by pairing participants with experienced mentors across Zain's operations, providing hands-on guidance, exposure, and professional development.

This year, Zain took meaningful steps toward embedding inclusivity more deeply into the program by piloting the integration of PWDs into selected WiT tracks. This pilot aims to ensure that emerging talents with disabilities can access equal opportunities in the technology sector, with tailored support and mentorship structures being tested and refined.

To better understand how the program can further evolve, Zain also conducted a comprehensive assessment of its digital platforms, identifying opportunities to enhance accessibility and leverage the company's online presence to expand program reach and improve the experience for both trainees and mentors.

Throughout 2025, the company set higher participation targets across all operations in Kuwait, Bahrain, Iraq, Jordan, and KSA. As a result, the fifth round of WiT saw increased enrollment, with each market tailoring its implementation timeline to accommodate the growing number of trainees while maintaining the program's high standards of delivery and impact.

OPERATION

Kuwait

CONTEXT

In 2025, Zain Kuwait significantly scaled the Women in Tech program, with 550+ participants completing the initiative, including six women with disabilities. This inclusion component was introduced to strengthen equitable access and ensure the program serves women with diverse needs. Through MoUs with institutions such as Box Hill College, GUST, and Kuwait University, participation is expected to increase further by year-end as the program becomes integrated into academic offerings.

The 2025 program focused on key digital transformation areas including Access Management, Cybersecurity, Cloud, Data, and AI, and was delivered by Zain employees with STEM expertise, supported by structured mentorship. Early outcomes indicate strong impact: five participants achieved notable career advancements, transitions into technical studies, and internal promotions.

ACHIEVEMENT SINCE 2022

- 2022: **-**
- 2023: **-**
- 2024: **7**
- 2025: **550**

OPERATION

Bahrain

CONTEXT

In 2025, Zain Bahrain conducted a supplementary with the Women in Technology Drive and Youth Connect Arabia to bring together young women from universities to explore opportunities in the tech and AI sector through a gamified learning session. The initiative emphasized inclusion, innovation, and future-ready skills, with participants engaging in interactive activities and receiving 40 certificates of participation in alignment with Google Developer Groups (GDG), recognizing their learning and growth in the tech space.

ACHIEVEMENT SINCE 2022

- 2022: **-**
- 2023: **-**
- 2024: **-**
- 2025: **-**

OPERATION

Iraq

CONTEXT

In 2025, Zain Iraq delivered an expanded edition of the WiT program, reaching 318 attendees across Baghdad, Basra, and Erbil. Participants engaged in 171 sessions delivered across nine specialized tracks covering Web Development, Networking Essentials, Data Analysis, Cybersecurity, and Mobile App Development.

The program was delivered in partnership with leading local tech and training organizations, ensuring strong technical quality and accessible learning.

The expanded model strengthened the program's ability to scale nationwide and further positioned Zain Iraq as a key contributor to women's digital upskilling.

ACHIEVEMENT SINCE 2022

- 2022: **115**
- 2023: **136**
- 2024: **160**
- 2025: **318**

OPERATION

Jordan

CONTEXT

Zain Jordan successfully streamlined the WiT program, the program was executed in two distinct phases to achieve the 2024 target. In the first phase, mentees participated, gaining valuable insights and skills through a series of structured sessions. The second phase followed, accommodating additional mentees and comprising six informative sessions.

ACHIEVEMENT SINCE 2022

- 2022: **100**
- 2023: **122**
- 2024: **154**
- 2025: **200**

OPERATION

KSA

CONTEXT

The Communications, Space and Technology Commission and Zain collaborated in the WiT program for the third year. The program commenced in December 2024 and was tailored for 150 women and completed in 2025.

ACHIEVEMENT SINCE 2022

- 2022: **100**
- 2023: **150**
- 2024: **150**

OPERATION

Sudan

CONTEXT

Zain Sudan continued the WiT program in an online format, adapting to the current situation on the ground. The initiative aims to empower women by providing them with advanced skills in programming, artificial intelligence, and innovation. The program followed a hybrid model, combining pre-recorded sessions with live, interactive ones to maximize accessibility and engagement for participants.

ACHIEVEMENT SINCE 2022

- 2022: **100**
- 2023: **150**
- 2024: **150**
- 2025: **55**

Women in Tech 2022 - 2025



Zain South Sudan and the Whitaker Peace and Development Initiative

Through its partnership with the Whitaker Peace & Development Initiative (WPDI), Zain South Sudan advanced efforts to strengthen peace, resilience, and socio-economic development in conflict-affected communities. A total of 629 women from multiple regions and ages received training in computer applications including Microsoft Word, Excel, PowerPoint, and internet use delivered through Zain's ICT data programs at community learning centers in Juba. The training aims to enhance digital skills and support women in expanding their business and livelihood opportunities.

Number of people trained in ICT SKILLS

Centre	Female
Torit	207
Juba	158
Yambio	234
Maridi	12
Nimule	18
Total	**629**

Generation Youth

Zain recognizes the growing importance of youth inclusion in shaping the region's social and economic trajectory, particularly as the Middle East and Africa (MEA) region continues to face some of the highest youth unemployment rates globally, alongside widening digital skills gaps. With one of the world's youngest and fastest-growing populations, these challenges intersect strongly with the rapid shift toward digital economies, where meaningful participation increasingly relies on connectivity, digital literacy, and safe online engagement.

As young people increasingly depend on digital platforms for learning, employment pathways, and social interaction, the quality, safety, and accessibility of these online environments have become central to their wellbeing. Safeguarding children's rights, especially their rights to protection, participation, and access to information, forms an integral part of Zain's approach to supporting youth. This commitment reflects the company's responsibility to ensure children and young people can navigate the online world confidently, safely, and without exposure to harm. In 2025, this commitment was recognized once again, with Zain ranked the regional leader in the Global Child Forum benchmark for the third year in a row, earning an 8.5/10 score and full marks in Governance & Collaboration category.

Guided by global developments in youth empowerment, digital rights, and child protection, Zain continued to embed youth- and child-focused considerations into its broader Sustainability Strategy. This included reinforcing responsible digital use, strengthening data privacy safeguards, and ensuring that young users have access to environments that are safe, trusted, and conducive to growth. Zain also maintains a strong focus on enhancing digital literacy, promoting equitable access to technology, and enabling young people to develop the skills required to participate meaningfully in the future digital economy.

The intersection of youth unemployment, digital skills readiness, online safety, and children's rights highlights the need for a holistic approach that expands opportunity while protecting wellbeing. Through its strategic priorities and sustainability commitments, Zain remains dedicated to empowering young people across the region to be active, resilient contributors to digital transformation and long-term sustainable development.

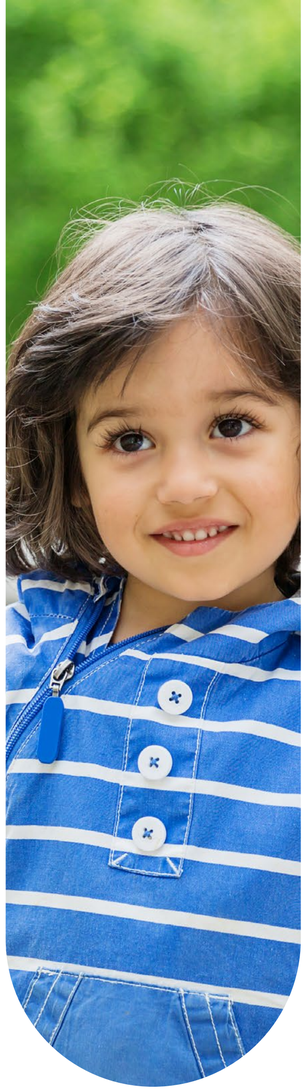
Children's Rights

Zain is committed to safeguarding children's rights throughout its business practices, its operations, value chain, and digital ecosystem. This commitment is grounded in international standards and reinforced by strong governance. Zain's Board of Directors has oversight to ensure children's rights and digital safety are promoted, emphasizing secure online environments and responsible access for young users, while ensuring that child protection is integrated into the company's broader commitment to ethical practices and sustainable digital innovation. As digital platforms play an increasingly central role in how young people learn, communicate, and access opportunities, Zain continued to strengthen its efforts to ensure their safety, privacy, and wellbeing.

Zain upholds strict safeguards against child labor across its operations and supply chain. The company prohibits the employment of anyone below the legal working age, in accordance with the International Labor Organization's Minimum Age Convention and relevant national legislation. In 2025, there were no reported cases of child labor across Zain's value chain. The process of identifying such is based on a rigorous due diligence procedure that includes supplier self-assessment questionnaires, physical audits with focused age-verification checks embedded into the practices. These controls are implemented across Zain's responsible supply chain management and Environmental and Social Management Plan (ESMP) requirements to ensure that operational activities such as tower construction, site preparation, field services, and base station deployment are conducted without exposing children to harm.

To reinforce accountability, Zain provides accessible grievance and reporting mechanisms for employees, suppliers, and external stakeholders. Concerns related to human and children's rights can be raised through line managers, Human Resources, the Compliance Office, or under the Whistleblower Policy. These channels ensure that potential issues are addressed transparently and in accordance with established investigation and remediation procedures.

Zain also maintains progressive family-friendly workplace policies recognizing the importance of early childhood development and parental support. The company offers four months of maternity leave with flexible working arrangements until a child is four months old and an optional two-month remote baby-bonding period, and five days of paid paternity leave. These policies reinforce Zain's broader commitment to children and families.





Protecting children in the digital environment remains a central pillar of Zain's approach. The company's Data Protection Policy reiterates its stance on not deliberately processing the personal data of children below the legal age unless verifiable guardian consent is obtained. Zain also strengthened privacy protections, integrated digital rights considerations, and promoted safe online engagement for young users across its footprint.

Zain Group conducted a child's rights gap analysis using UNICEF's Child Rights Impact Self-Assessment Tool for Mobile Operators (MO-CRIA). The assessment focused on the Procurement, and Products and Sales alongside the indicators under Module 4 and 5 of the tool, enabling Zain to benchmark its existing supply chain and commercial practices against international best practices and identify potential gaps related to child rights.

Through the MO-CRIA Module 4 (Products and Sales) category, Zain engaged with commercial teams and conducted groupwide upheld ethical standards in its marketing and communications. Guided by the Responsible Marketing and Communications Standard and aligned with international frameworks such as UNICEF's MO-CRIA, the company ensured that all content is age-appropriate, accurate, inclusive, and free from manipulative or harmful messaging. Parental or guardian consent is obtained where required, ensuring strong data and privacy safeguards for minors.

This year, Zain continued to review its current supply chain frameworks and procurement controls to evaluate alignment with the identified requirements. Any gaps highlighted through the MO-CRIA assessment are currently being addressed through targeted enhancements to the Supplier Code of Conduct, related to child protection, labor standards, and human rights across the supplier base. This approach supports Zain Group's ongoing efforts to strengthen responsible procurement, strengthen children's rights, and drive continuous improvement across its value chain.

In support of broader community protection systems, Zain also maintained a multi-year partnership with Child Helpline International (CHI). Through this collaboration, the company helps strengthen national child helplines and expands access to trusted, confidential support services for children and young people in its markets. This partnership complements Zain's internal safeguards by reinforcing external protection mechanisms and promoting awareness of digital risks and child wellbeing.

Together, these efforts reflect Zain's comprehensive, end-to-end approach to safeguarding children's rights, spanning governance, supply chain integrity, digital safety, ethical communication, strong internal policies, and community partnerships. By embedding these principles across its operations, Zain continued to uphold the highest standards of responsibility toward children and young people throughout its footprint.

Child Online Safety:

Partnership with Child Helpline International:

Zain is continuing in its Memorandum of Understanding (MoU) with Child Helpline International (CHI), supporting child helplines across its operations. In its third year, this partnership has focused on offering support through mobilizing and facilitation child helpline services, alongside physical roadshows.

Zain Kuwait

Kuwait National Child Protection Program (KNCPP) - 147

In 2025, Zain Kuwait continued in its efforts to sustain the 147 Child Helpline in partnership with the Kuwait National Child Protection Program (KNCPP), through targeted initiatives and awareness campaigns., including creating an animated video and to raise awareness and reiterate public trust in child protection services.

In addition, school roadshows were conducted, engaging in over 50 participants, with counselors, teachers, and education professionals from over 6 schools, further strengthening availability of child support services.

As a main sponsor, Zain continued to play a central role in supporting the awareness of the helpline throughout the year. In addition, further efforts were made to strengthen child protection services, implementing a series of awareness campaigns and engagement initiatives aimed at promoting safe digital practices, child counselling guidance, and strengthening overall awareness of the service. The helpline handled a total of 5,212 calls during the year, reflecting continued public reliance on the service. Due to the continued efforts mainly from Zain, alongside other stakeholders, the helpline received 1,835 calls, with a 64% year-on-year increase and a 34% increase compared to Q3.

Zain Jordan:

Jordan River Foundation - 110

In 2025 Zain Jordan expanded its nationwide awareness efforts to promote the Child Helpline and encourage access to support services. The company launched an awareness campaign through SMS broadcast targeting 100,000 individuals. Zain Jordan also utilized traditional media channels such as radio interviews as well as television interviews to reach a wider audience.

Moreover, Zain Jordan also conducted a social media campaign, that included four short videos highlighting the key services provided by the CHI 110 hotline, aiming to increase visibility, engagement, and public awareness of the available support services, which reached over 127,000 views.

As a result of these combined awareness efforts, the helpline recorded a significant increase in utilization. Total calls reached 886 in 2025, compared to 552 in 2024, representing a 60% year-on-year increase. Following the SMS campaign, calls increased from 3,496 to 5,049, reflecting heightened awareness and accessibility of the service.

Zain KSA:

Saudi Arabia National Family and Safety Program Helpline - 11611

In 2025, Zain Saudi Arabia continued to support child protection services by raising awareness of online safety and children's rights through both digital and on ground activities. Social media campaigns resulted in 65,194 impressions, and an on-ground activation of the helpline was delivered to 443 children through 10 awareness sessions, addressing issues such as bullying and children's rights.

Digital Literacy

Target

To equip 471,000 children and youth with digital literacy skills by 2025

In 2025, digital transformation across the region continues to expand rapidly, unlocking new pathways for learning, economic participation, and social inclusion. Yet despite this growth, significant gaps in digital literacy persist, especially amongst youth and vulnerable groups. With the growing reliance on digital platforms for education, work, and daily activities, online risks are becoming more prevalent. Bridging these gaps is now more critical than ever, to ensure all individuals participate confidently in the digital ecosystem, protect themselves online, and benefit from emerging digital opportunities.

Zain Kuwait:

Zain Kuwait continued to advance youth digital empowerment through its support of Academy X and Kuwait Codes, two flagship programs delivered in partnership with CODED. Kuwait Codes introduces high school students to programming and emerging technologies through specialized technical tracks, while Academy X, a non-profit initiative, focuses on equipping young women with essential digital, design, and entrepreneurship skills. Across both programs, participants engaged in practical learning on topics such as cybersecurity, Python with AI, mobile and web development, product design, and business innovation. Together, these initiatives fostered a strong pipeline of digital talent, culminating in the graduation of 1,288 students in 2025, reinforcing Zain's commitment to building future-ready capabilities among Kuwait's youth.

Zain Iraq:

In 2025, Zain Iraq strengthened youth digital inclusion and online safety through a series of high-impact initiatives. The company recorded 99,750 new active users on the Zain Kids platform during Q1 alone, significantly expanding access to digital literacy content for children and families. In parallel, the company supported future workforce readiness by enabling 200 youth to apply for CISCO digital skills courses through the Raqami platform, further reinforcing Zain Iraq's commitment to empowering young people with essential digital competencies. Zain Iraq also conducted bullying and cyberbullying awareness sessions for primary school students in Basra and Baghdad on a quarterly basis. The sessions aimed to educate students on recognizing harmful behaviors, promoting respectful communication, and encouraging safe online practices.

Q1	Q2	Q3	Q4	Total
230 students	80 students	100 students	260 students	670 students

Zain South Sudan:

In partnership with the Whitaker Peace and Development Initiative, Zain South Sudan advanced digital inclusion by supporting large-scale ICT capacity-building youth across five states. A total of 1,725 participants (629 women and 1,096 men) were trained in core computer applications including Microsoft Word, Excel, PowerPoint, and internet navigation through Community Learning Centers in Juba, Torit, Yambio, Maridi, and Nimule.

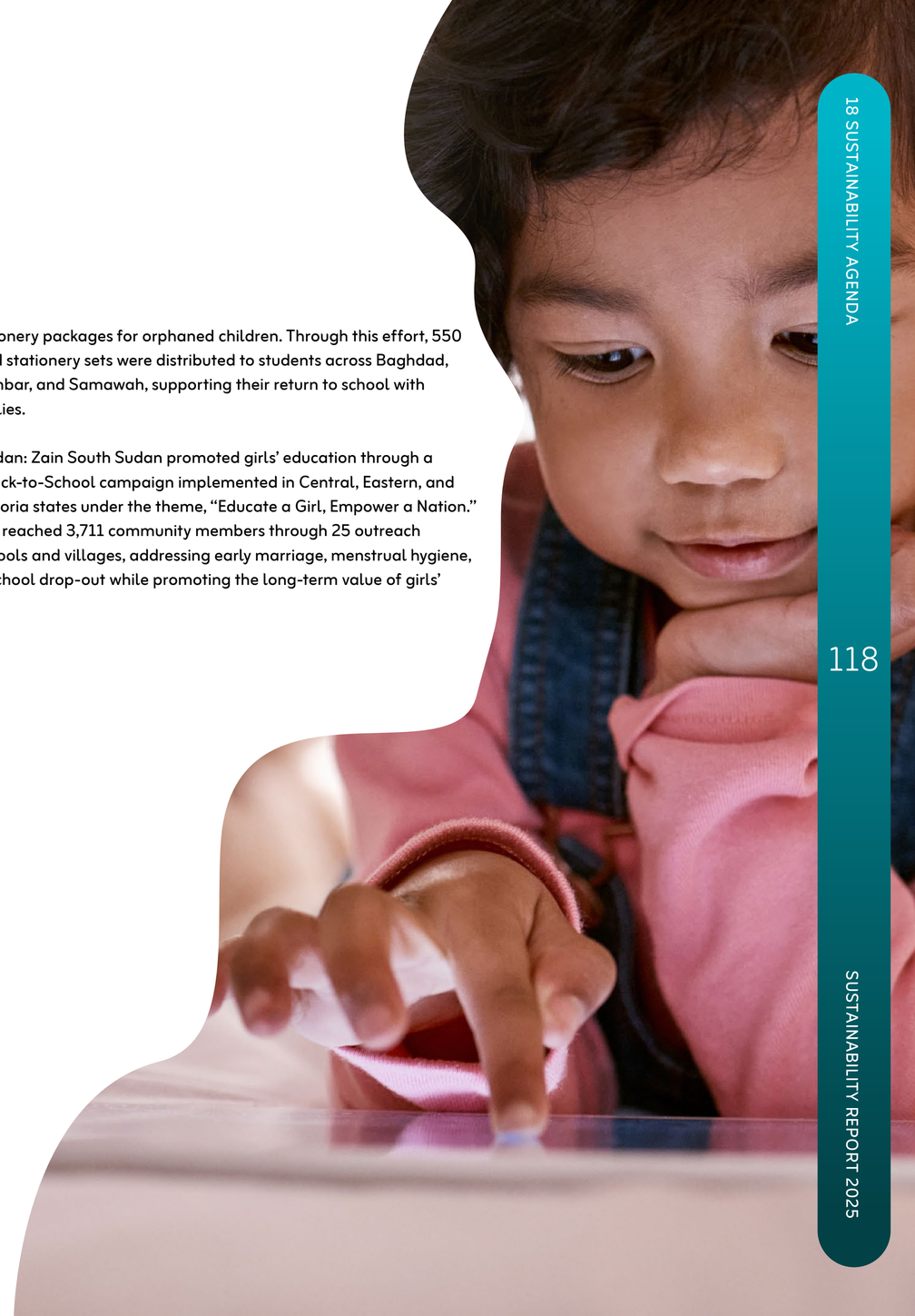
As part of Zain South Sudan's partnership with the Whitaker Peace and Development Initiative (WPDI), a series of trainings on online privacy and cybersecurity were delivered to school children at the WPDI Community Learning Center in Juba. The initiative aimed to raise awareness towards the importance of safe digital practices among children, equipping with them with the knowledge and skills to navigate the online environment security. The sessions covered key topics including phishing and social engineering, password protection and authentication, public Wi-Fi risks, social media safety, cyber hygiene, and responsible internet use. Through this initiative, a total of 487 children were given training, strengthening their awareness on online privacy and safer digital behavior.

Back to School Programs:

Zain Sudan: In response to the destruction of schools, Zain Sudan launched its flagship initiative, Back-to-School, offering support in basic education in six areas affected by the conflict: Khartoum, Sennar, Al Jazirah, White Nile, Al Gadarif, and North Kordofan. The project provided 1,090 school benches and 3,004 sets of school uniforms and scholastic materials. Supporting over 5,000 students (2,610 girls, 2,390 boys).

Zain Iraq: As part of its Back-to-School campaign, Zain Iraq hosted a five-day stationery bazaar at its headquarters, encouraging employees to purchase bags and stationery packages for orphaned children. Through this effort, 550 backpacks and stationery sets were distributed to students across Baghdad, Erbil, Basra, Anbar, and Samawah, supporting their return to school with essential supplies.

Zain South Sudan: Zain South Sudan promoted girls' education through a large-scale Back-to-School campaign implemented in Central, Eastern, and Western Equatoria states under the theme, "Educate a Girl, Empower a Nation." The campaign reached 3,711 community members through 25 outreach sessions in schools and villages, addressing early marriage, menstrual hygiene, poverty, and school drop-out while promoting the long-term value of girls' education.



Youth Unemployment

Targets

1. Reach unemployed youth through training, skills development, workshops, and mentorship opportunities

2. Support the startup ecosystem and help create pathways for employment.

Youth unemployment remains one of the region's most pressing socio-economic challenges, particularly as instability, conflict, and shifting market demands continue to affect young people's access to opportunities. With the region still experiencing some of the highest youth unemployment rates globally, Zain recognizes the need for integrated strategies that advance education, digital and technical skills, and employment readiness. Addressing youth unemployment not only responds to urgent economic concerns but also strengthens long-term social resilience, ensuring young people are empowered to participate in and contribute to sustainable economic growth.

Zain Kuwait: Developing Youth Skills

Zain Kuwait continued expanding youth empowerment through flagship development programs. The sixth edition of the Zain Summer Program offered hands-on workplace training and professional development, generating measurable business value with 1,711 sales transactions totaling 16,966 KWD, and attracting 132% more applications. The 10th edition of the KON Program, delivered in partnership with Babson College, guided 45 teenagers through five weeks of entrepreneurship workshops, mentoring, and final business pitches. Additionally, the 20th edition of INJAZ supported 200 students with programs in entrepreneurship, work readiness, and financial literacy, strengthening career preparedness and leadership skills for the next generation.

Zain Sudan: Vocational Training

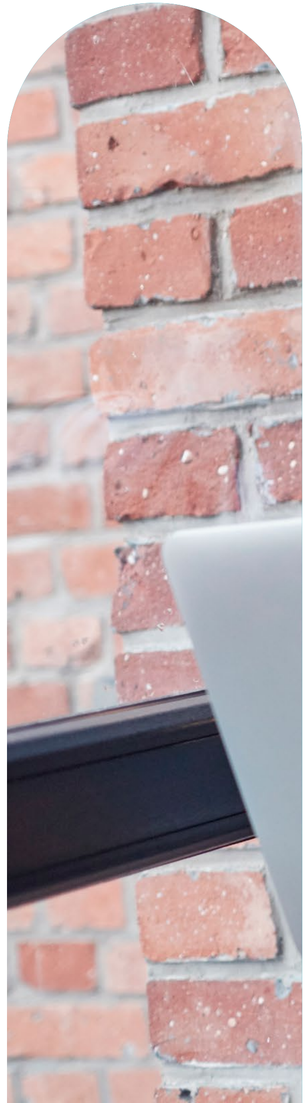
Amid ongoing instability and high youth unemployment, Zain Sudan delivered its vocational training program, aimed at equipping young Sudanese individuals with practical, market-relevant skills. Provided in collaboration with local partners, the program offered hands-on training in areas such as device repair, basic electronics, and other technical competencies aligned with current labor market needs. In 2025, the initiative further emphasized resilience and sustainable livelihoods, enabling participants to gain the confidence and capabilities needed to enter the workforce. To date, the program has supported more than 715 youth across Egypt and Sudan, preparing them with the competencies required to secure meaningful employment. The program offered practical, market-driven skills in areas such as solar energy, electronics, tailoring, food manufacturing, and carpentry. Training durations ranged from 10 days to nearly two months, with a strong emphasis on women's empowerment and economic inclusion.

Zain Jordan: Mobile Maintenance Vocational Training

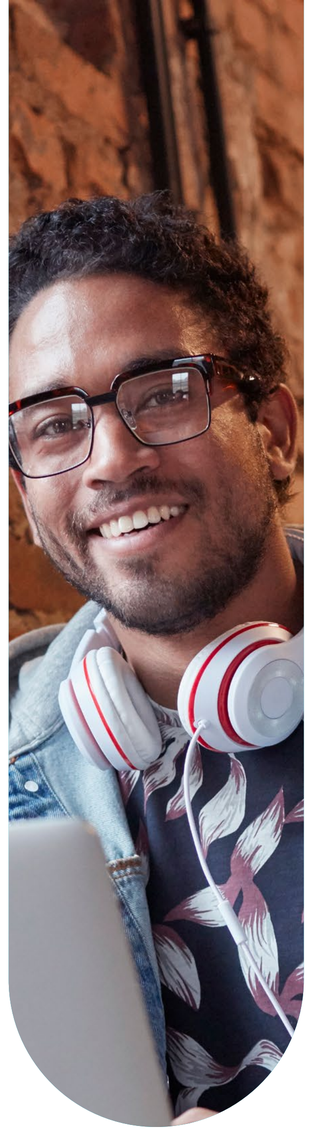
Since its launch in 2008, Zain's Mobile, Gaming Devices, and Fiber Training Program provided certified vocational training that equips youth with practical skills in mobile maintenance, gaming console repairs, and fiber network installation. Operating across seven centers in six governorates, including one serving Palestinian refugees through a partnership with UNRWA, the program enabled participants to enter the job market or start their own businesses. In 2025, the initiative was strengthened by extending total training duration from three to six months, introducing specialized modules in gaming console maintenance, and securing official accreditation from the Skills Development Commission and the Vocational Training Corporation.

Zain South Sudan: Youth Empowerment

As part of ongoing efforts to strengthen youth employability, Zain launched its Youth Empowerment program under Zain South Sudan's overarching partnership with the Whitaker Peace and Development Initiative. The program is a comprehensive CV and career development initiative that reached 487 young people across South Sudan, where 190 were females and 297 males. In Eastern Equatoria, 71 youths gained soft skills, CV and cover-letter writing training, and were introduced to online job platforms, with 24 producing professional resumes and 23 accessing digital job portals for the first time. In Central Equatoria, 116 participants received training in crafting compelling CVs and cover letters, interview preparation, and career guidance, reporting increased confidence entering the labor market. Meanwhile, 300 youths in Western Equatoria enhanced their capabilities in CV writing, interview readiness, and email account creation. Collectively, the initiative improved access to opportunities and strengthened job-market preparedness across the three states.







19

Task Force on Climate Related Financial Disclosures



The following section addresses Zain's response to the Task Force on Climate-Related Financial Disclosures (TCFD) in alignment with the guidance on the framework.

Zain's Climate Action Journey

2012

First Sustainability Report

2016

Completed first five year target cycle

2017

Aligned CO_2 emission actors for IEA Standards

Set new CO_2 emissions reduction targets for five years

2018

Updated Zain's Enviromental and Social Management Plan to incluce IFC recommendations

2019

Became a member of the GSMA Climate Action Task Force

Disclosed to CDP - private

2020

Disclosed to CDP - public

Established a Climate Action Committee (CAC)

2021

Achieved A- score (leadership) through CDp

Plan to introduce Internal Carbon Pricing (ICP)

Plan to commit to SBTI

Published ZAIN's Climate Change Policy

2022

Developed the Climate Change Compilance Framework (approved by the Board)

Formal commitment letter approved by SBTI and received acceptance letter on January 6, 2023

Set new CO_2 emissions targets for five years

2023

Board approved Waste Management Policy

Submission of Science-Based Targets to the Board of approval

The joint creation of Sustainability Innovation Hub under the GCC Telco Alliance

2024

Board approved Waste Management Compliance Framework

Zain's Science-Based Targets have been approved by the Science-Based Targets initiative (SBTI)

2025

Launched Climate Transition Plan

Continued Scope 1 and 2 Reasonable Assurance and added Scope 3 this year



Governance

a. Describe the Board's oversight of climate-related risks and opportunities

The Vice-Chairman and Group CEO of Zain is responsible for setting the strategic direction for the company. He also leads the implementation of the company's strategy, which includes climate change-related adaptation and mitigation plans.

Zain performs an annual review of its five-year business plan to align future investments with its strategic direction set by the Board. The revised five-year business plans and annual budgets are consolidated and submitted to the Board for approval at the end of each year. These plans and budgets include capex requirements for the implementation of energy-saving initiatives that would help achieve the company emissions targets. Throughout this process the Vice Chairman and Group CEO oversees and guides the development of Zain's climate transition plan.

As part of the governance process, Zain's Board reviews and approves the business plans and budgets submitted annually by the Group CEO, which becomes the reference for the execution of the company's strategy. The Board, through the Group CEO, monitors the implementation of all initiatives including those related to climate change mitigation and adaptation. The Group CEO has given the responsibility of managing day-to-day climate-related issues to the Group Chief Sustainability (CSO) and Group Chief Technology Officers (CTO) who co-chair the Climate Action Committee (CAC), and whose roles are to ensure the approved climate change mitigation and adaptation initiatives are properly implemented. The CSO and CTO report directly to the Vice Chairman and Group CEO who in return reviews Zain's climate-related performance and provides guidance to the CAC for preventive and corrective actions when required to ensure that the company meets its targets.

The CAC is a cross-functional committee established following an internal consultation process, with the purpose of providing the Board with oversight into climate-related matters. Through the CSO and CTO, the CAC provides recommendations to the Board on how to manage climate-related risks and opportunities. The Board reviews and approves the recommendations from the CAC, and these approvals are reflected by the CAC in the company strategy for identifying, assessing, and managing climate-related risks and opportunities.

The CAC meets quarterly to discuss climate-related risks and opportunities that are immediately reported to the Board through the Group CEO, who provides recommendations and guidance. The reports to the Board by the CAC are done during regular quarterly Board meetings, whereby all management issues are also discussed. Board decisions on reported climate-related issues are made as frequently as needed, with the quarterly reviews focusing on ensuring that the company is meeting its climate specific key performance indicators (KPIs) in terms of greenhouse gas (GHG) emission levels, fuel and electricity consumption, waste management, and public awareness on climate change. By monitoring such KPIs on a quarterly basis, the Board can assess, evaluate, and support the company's performance regarding climate change-related issues. In addition, the Board has a clearer viewpoint of the progress the company is making in this regard.

Zain provides its management team with incentives for its contribution to helping achieve its environmental commitments and transition goals as set in the Board's approved climate change compliance framework. This framework outlines the strategic path to achieving net-zero emissions by 2050. The objectives and KPIs within the framework are disseminated to team members at both the Group and operation/subsidiary levels. All stakeholders, including operations/subsidiary CEOs, CAC members, and employees responsible for supporting climate targets, are assigned clear climate action objectives. The company conducts an annual assessment of its management team's overall performance, including climate change mitigation and adaptation efforts. This assessment determines monetary rewards based on the progress towards achieving the predetermined objectives.

b. Describe management's role in assessing and managing climate-related risks and opportunities

The Board, through the Group CEO sets the direction that shapes the strategy of the company for addressing climate change. All management issues including climate-related matters such as the company's CO_2 emission reduction targets status, risks associated with ambient temperature increase, the possible changes in precipitation pattern, as well as the transition to new technologies due to climate change. These issues are the responsibility of the Group CEO, who delegates the day-to-day operations and control of climate-related issues to the CAC co-chaired by the CSO and the CTO.

Below is a summary of the roles and responsibilities of each major management function within the CAC:

1. Chief Financial Officer (CFO): Manages annual budgets related to environmental issues, reviews climate-related initiatives business cases and approves associated project budgets. Manages capital requirements and reviews decisions about investments in new technology such as the use of renewable energy and the deployment of energy efficient solutions.
2. Chief Technology Officer (CTO): Oversees the selection, testing, and implementation of new technologies within the company. To ensure that transition risks and opportunities such as the deployment of energy efficient solutions are properly managed, the CTO's contribution is key. He is responsible for energy efficiency improvements and energy use. He also measures and reports energy use against targets. The CTO sets emissions-related KPIs and monitors the implementation of low emissions solutions. The CTO co-chairs the CAC with the CSO. Both CTO and CSO provide an oversight to the Board into climate-related issues and ensure that recommendations from the Board are considered in the company's strategy for addressing climate-related issues.
3. Chief Sustainability Officer (CSO): This executive has a central position with respect to Zain's climate agenda. The CSO strategically drives the company's net-zero ambition by ensuring that all value chain emissions are properly addressed through a framework that runs from the emissions boundary to the scopes; the timeline; and the engagement with suppliers and local authorities. The CSO has day-to-day responsibility for the implementation and reporting of all climate-related issues within the company. She provides guidance and recommendations for climate change and sustainability strategy, monitors climate-related KPIs (emissions, renewable energy objectives, climate awareness and engagement), and climate-related incentives. The CSO co-chairs the CAC with the CTO. Both CSO and CTO provide an oversight to the Board regarding climate-related issues and ensure that recommendations from the Board are considered in the company's strategy for addressing climate-related issues.
4. Chief Risks Officer (CRO): The CRO integrates climate-related risks and opportunities into a Group-wide risks and opportunities identification and management process to ensure that climate-related risks and opportunities are properly managed.

The CRO identifies and quantifies climate change risks and opportunities, performs scenario analysis, prepares mitigation plans for the identified climate change risks, monitors those risks, and ensures proper response whenever the risks materialize.

The CRO ranks the risks on an annual basis to prioritize them and provides recommendations for mitigation and adaptation.

On a quarterly basis, the CRO reports the status of all the identified risks, including climate change-related risks to the BRC.

The BRC reviews the risks and sets priorities for mitigation and adaptation when required.

Those priorities are part of the recommendations that the Board provides to the CAC through the Vice-Chairman and Group CEO.

Strategy

The information included below reflects figures and analysis for 2025.

a. Describe the climate-related risks and opportunities the organization has identified over the short-, medium-, and long-term.

Short-term

1 TO 3 YEARS

Comment: The short-term time horizon is aligned to the company's business planning process. The short-term business plan considers this period for the operational risks arising due to climate change events that need to be addressed to enhance services to remain competitive throughout markets. The normal lifetime of some of our assets such as diesel generators used on off grid sites is approximately three years, hence, we consider three years to be a reasonable period for assessing the impact of physical risks on such assets. From a financial and strategic perspective, Zain's short-term horizon is focused on development and achievement of revenue forecasts, cost targets and profitability targets.

Medium- term

3 TO 5 YEARS

Comment: The medium-term time horizon is aligned to medium-term business planning process that uses a five-year horizon period for the operational risks arising due to climate change events. This period is also in line with the lifetime of other assets such as the deep cycling batteries, which are used to mitigate the risks associated with some of the physical and transition risks. Zain's five-year business plan is prepared every year while monitoring the progress of the previous year's five-year plan's execution. The business plan is updated with actual figures for the first year and the revised forecast for four years, subsequently an incremental year is added

Long-term

5 TO 15 YEARS

Comment: The long-term business financial planning process is planned for over 5 -15 years to align with Zain's goals of climate change initiatives. A significant portion of the company's assets, including cooling systems, DC power systems, radio systems, and other active equipment in transmission and core sections, are gathered during this specific timeframe. The impact of physical risks on such assets is evaluated and mitigated to ensure that the company remains competitive in its markets of operation. From a strategic perspective, a business plan entails the long-term horizon and is focused on a forecast of cashflows and revenue potential from the initiatives that Zain identifies as part of the organization's strategy.



Risks identified as input to the Strategies for scenario planning

Transition risks: Increase in energy tariffs

During the assessment of climate-related risks for data centers, telecom core sites, offices, and base station facilities, Zain identified that there could be an increase in operational expenditure (opex) due to fuel tariff hikes and grid power units in areas of operations.

The biggest operating costs are energy-related to cateing for cooling requirements for telecom and IT systems that require temperatures of approximately 23°C for optimum performance, which is much lower than ambient temperatures in Zain's markets of operation. The total energy consumption in 2025 was 1240.39 GWh and 128.4m liters of diesel across Zain's operating entities.

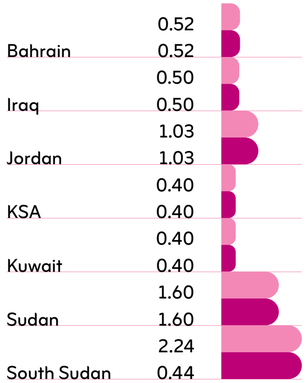
For the Strategies for Scenario Planning 2 (SSP2) – 4.5 2039 scenario, it is estimated that energy operating costs could increase by approximately 61% to USD 314.57M. The estimated figures factor in the underlying per unit grid power and diesel fuel hikes as per macroeconomic indicators due to inflation and gradual reduction of subsidies.

The increase in costs is primarily due to:

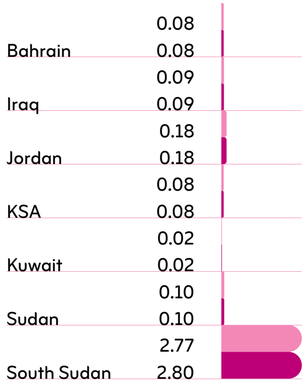
1. Rise in energy tariffs due to inflation
2. Rise in mean temperatures

Zain estimates the increase in tariffs per liter of diesel and per kWh of grid power as per inflation rates in each of Zain's operations are due to varying macroeconomic profiles.

Diesel Fuel price (USD) per liter across OpCos



Grid price (USD) per unit kWh



Physical Risks: Rise in Mean Temperature

The Middle East and North Africa (MENA) region experiences extremely hot weather temperatures, which led to energy consumption increases in 2025. According to multiple studies, including the projections of the World Bank Group (WBG), the region will continue to face increasingly high temperatures for longer periods under current scenarios (SSP2 4.5 - means business as usual).

Opportunities Identified

Returns on investment in low emission technology

Zain noticed that it could achieve savings in energy consumption by reducing dependency on fossil fuels, which would lead to CO_2 emissions and opex reductions. The driver for this initiative was the erratic availability and pricing of diesel in Zain's markets, especially in Sudan and South Sudan.

The availability of a reliable universal grid supply is essential for economic growth and the alleviation of poverty.

While the South Sudanese government's desire to modernize and extend on-grid coverage and introduce additional generation capacity is commendable, until such time when a stable political and conflict-free environment exists in the country, the current challenging state of the nation's main utility supply is likely to persist for the foreseeable future.

To address ongoing power challenges, Zain implemented a range of green energy solutions, including battery-hybrid systems, solar installations, outdoor equipment modernization, grid connections for base station sites, and site-sharing arrangements with other mobile network operators. Zain's strategic approach focuses on converting identified physical and transition risks into opportunities by adopting solutions that reduce operating costs while ensuring payback periods do not exceed six years. The deployment of energy-efficient technologies resulted in an opex reduction of USD 5.50m in 2025, with benefits expected to continue for at least an additional five years, corresponding to the operational life of the installed equipment. These initiatives also contributed to a reduction of 14,123 metric tons of CO_2 emissions in 2025. While the opportunity extends across Zain's wider operations, Iraq, Sudan, and South Sudan represent the primary beneficiaries due to their grid availability constraints and the elevated cost of diesel driven by local currency devaluation.

a. Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.

The success of risk management will depend on the effectiveness of the management framework providing the foundations and arrangements that will embed it throughout the organization at all levels. The risk management framework operates at varying levels and within specific contexts of the organization. The framework ensures that information is adequately reported and used as a basis for decision-making and accountability at all relevant organizational levels.

The Group Enterprise Risk Management team develops an annual risk plan to include all Zain operations for the purpose of scheduling periodic risk assessment exercises. During the assessment for a particular operation, the leadership of commercial and corporate divisions, and technology, define their risk attitude, including climate-change risks, which may affect their businesses. Risk severity is reviewed to ensure alignment and acceptability.

As per risk management methodology, Zain' risk assessment impact matrix has a five-point scale based on financial indicators, namely revenue, capex intensity, and operational EBITDA margins. The highest impact grading is "extreme," which would be applicable for an event when its financial impact exceeds the most significant thresholds. For substantive financial impact, the company identified thresholds to determine if a risk has the potential to significantly affect the company and needs to be reported.

Zain's risk management corporate policy defines an acceptable risk as the degree of exposure that the company is ready to accept in as much as it allows the creation of value, achieving the right balance between growth, performance, and risk. This threshold is considered when reviewing the strategy to ensure we operate within the established risk appetite.

The following are the thresholds for substantive or high financial impact as per Zain's risk matrix:

- Whenever there is a risk that results in an impact on gross revenue of more than 4% of operation's annual revenue.
- When capex intensity planned for the fiscal year exceeds 10% (where capex intensity is the ratio between capex to revenue).
- When the impact of the risk event exceeds EBITDA margins of the operations by more than 3%.

b. Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.

CLIMATE-RELATED SCENARIO

Transition Scenario IEA 450

SCENARIO ANALYSIS COVERAGE

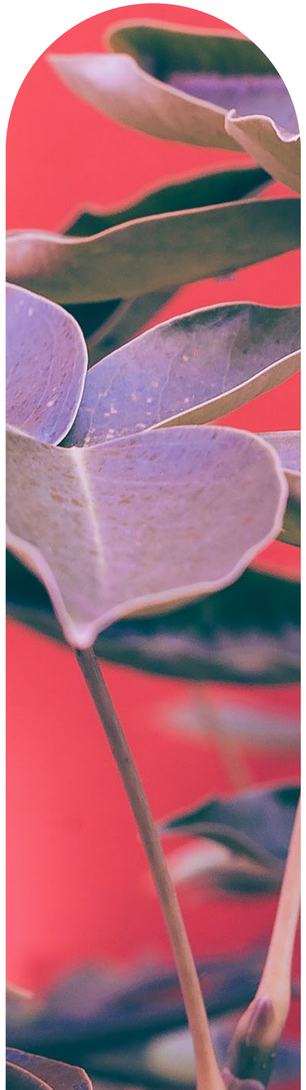
COMPANY-WIDE

PARAMETERS, ASSUMPTIONS, ANALYTICAL CHOICES:
Temperature alignment: The company explored changes in energy costs under one of the IEA scenarios, namely the IEA 450, which is aligned with temperature increases to or below 2°C compared to pre-industrial levels. Parameters, assumptions, and analytical methods increases in energy tariffs will lead to an increase in energy costs for the operation of telecom/IT sites.

During the assessment of climate-related risks for data center locations, offices, and base station sites, Zain identified that there could be an increase in operational expenditure due to tariff hikes for fuels and grid power units in areas of operation. Energy prices are subsidized in oil rich operations in Kuwait, Saudi Arabia, and Bahrain. The biggest operating costs are energy-related to cater for cooling for telecom and IT systems, which require temperatures of 22°C, which is much lower than the average ambient temperatures in these markets.

Zain's total energy consumption in 2025 was 128.4 Liters and 1240.39 GWh across seven operations. The 2025 overall energy cost was USD 195.3m from the 2024 overall energy cost which was based at USD 155.26m.

Overall energy costs including diesel in 2025 was USD 195.34. With Zain's long-term planning process of 14 years, it estimates that energy operating costs could increase by over 60% to USD 314.57 m in 2039.



The estimated figures factor in the underlying per unit grid power and diesel fuel hikes as per macroeconomic indicators due to inflation and gradual reduction of subsidies.

The increase in costs is primarily due to two main variables: 1. A rise in energy tariffs due to inflation and reversal of subsidies in some operations, and 2. A rise in mean temperature.

CLIMATE-RELATED SCENARIO

Physical Climate Scenarios SSP 5 8.5

SCENARIO ANALYSIS COVERAGE

COMPANY-WIDE

PARAMETERS, ASSUMPTIONS, ANALYTICAL CHOICES:
This business-as-usual scenario (SSP 2 4.5) assumes temperature increases by 0.92°C by 2039 and 1.6°C by 2059 compared to pre-industrial level.

Parameters, assumptions, and analytical methods: Zain relies on World Bank Group (WBG) forecasts, that use data from the CMIP6 models included in the IPCC - AR5 as a reference to help project climate change states for the entire company. Two-time horizons were considered: 2020 – 2039 and 2040 – 2059. These two horizons are the default horizons proposed by the WBG using the CMI6 models for climate change projections.

Within these horizons, and considering a linear progression, a 15-year climate change analysis from 2020 to 2035 (main time horizon) was derived to align with Zain's corporate risk management long-term timescale and the life cycle of its assets. The company explores both physical and transition risks for Zain's base stations, data centers, and office buildings.

As per SSP 8.5 Ensemble, there will be an average temperature increase of 0.99°C by 2039 and 2.19°C by 2059.

A vulnerability assessment of Zain's operations revealed that some of the company's assets in the seven operations will consume more power to maintain the same level of temperature because of the positive correlation between external temperatures and energy consumption.

To reduce the energy consumption due to increased cooling requirements, a set of initiatives has been developed under one of the strategic pillars which is, "operational effectiveness." These initiatives helped reduce 806 metric tons of CO_2 emission in 2025.

CLIMATE-RELATED SCENARIO

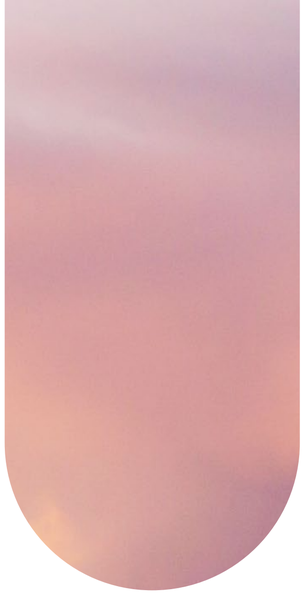
Physical Climate Scenarios SSP 1 2.6

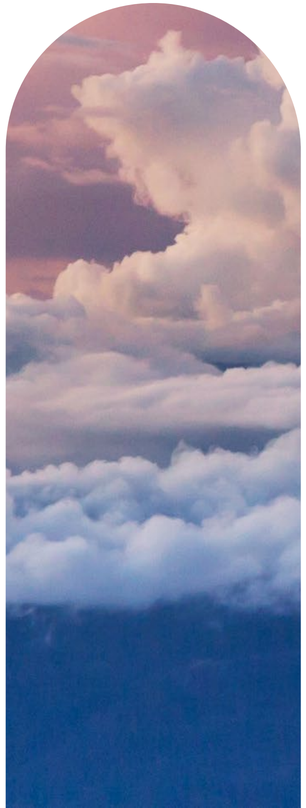
SCENARIO ANALYSIS COVERAGE

COMPANY-WIDE

PARAMETERS, ASSUMPTIONS, ANALYTICAL CHOICES:
Temperature alignment: The company's ambition is to be net-zero by 2050. To understand the impact of such a move on the business, Zain looked to uncover associated costs. This analysis is based on SSP 1 2.6 pathway that limits the rise in mean temperature to 1.5°C compared to the pre-industrial era. Parameters, assumptions, and analytical methods: The parameters considered in this analysis are the number of sites, energy consumption per site, and the share of renewable power.

The projected energy consumption is based on the number of sites in 2050, against a set of initiatives ranging from the deployment of hybrid battery solutions, outdoor cabinets, and solar power solutions. Although energy consumption is likely to increase, the fact that the share of solar-based power increases at a faster rate helps predict substantial reductions in CO_2 emissions. It is assumed that solar plants will be deployed in operations in Bahrain, Sudan, South Sudan, Kuwait, and Jordan for the company to be able to achieve 80 – 90% reduction of CO_2 emissions by 2050. The remaining 10 – 20% of the emissions will be offset through investments in carbon sinks and the implementation of carbon capture solutions.





Risk Management

a. Describe the organization's processes for identifying and assessing climate-related risks?

The company recognizes that climate change poses several physical and transition-related risks to its business.

The risk assessment process consists of four steps: Risk identification, analysis, evaluation, and treatment. The scope of the risk assessment processes includes all people, processes, and technology within Zain Group and its operating countries.

Risk Identification: Risk owners and the risk management team review the risks specific to the division and identify any emerging issues that are material to the operating environment.

Risk Analysis: For the identified risks, impact of the risk event is based on the likelihood of occurrence and the impact severity of the identified risk events.

Risk Evaluation: For the identified risks, the management team assigns risk owners who perform detailed root cause analysis of their respective risk and take actionable steps.

Risk Treatment: Mitigation plans are agreed between the risk manager and the risk owners.Operating company (opco) risk managers present the status of current and proposed plans for the approval of operation CEO. Once the mitigation plans are approved by the respective CEOs, risk managers share the risk register with the Group risk management team.

Climate change risks are considered in Zain's risk universe as defined in Zain's Risk Management Policy and included in the company's risk assessment and evaluation. The Climate Change Risk process monitors both physical risks and transition risks.

Risks & opportunities Identification & assessment

The climate risks and opportunities identification process follows a bottom-up approach by advising operations based on analysis of historical and projected data related to physical and transition risks and opportunities.

Risk assessment exercises are conducted annually, where the Group Risk Management team identifies risks across short-, medium-, and long-term timeframes. Risks arising from climate change impact on operations, and macroeconomic factors are some of the long-term risks in the company's register.

Risks are quantified based on the likelihood and impact as per the risk management criteria for revenue, EBITDA, and other metrics.

b. Describe the organization's processes for managing climate-related risks.

For managing climate-related risks, energy sources are closely monitored. Fuel and electricity consumption patterns are analyzed to assess variations. In case energy consumption increases more than 10% quarter-on-quarter, the concerned operations are required to provide details and justifications for such changes.

The Coupled Model Intercomparison Project, Phase 6 (CMIP6) models included in the IPCC's Sixth Assessment Report (AR6) were referenced. Global warming of 1.5C relative to 1850–1900 would be exceeded in the 21st Century under the intermediate, high, and very high GHG emissions scenarios considered in this report (SSP2-4.5, SSP3-7.0 and SSP5-8.5, respectively). For the analysis, Zain selected the following SSP scenarios: SSP1 – 2.6: Sustainability Road, SSP2 – 4.5: Middle of the Road, SSP5 – 8.5: Fossil fuel development.

The following estimations were taken per operation:

SSP1 2.6 2039: Kuwait (1.012), KSA (1), Bahrain (0.971), Iraq (1.113), Jordan (1.086), Sudan (0.863) and South Sudan (0.702).

SSP5 8.5 2039 and 2059: Kuwait (1.2222.492), Saudi Arabia (1.18, 2.453), Bahrain (1.158, 2.244), Iraq (1.302, 2.538), Jordan (1.258, 2.362), Sudan (0.923, 2.047), South Sudan (0.688, 1.643).

SSP2 4.5 2039 and 2050: Kuwait (1.018, 1.813), Saudi Arabia (1.035, 1.8), Bahrain (0.979, 1.688), Iraq (1.11, 1.854), Jordan (1.082, 1.731), Sudan (0.858, 1.496), South Sudan (0.628, 1.268).

The timeframes include Zain's net-zero timeline, but the analysis went beyond 2050 to provide an understanding of the extent to which the business could be impacted in the long run.

Knowing the total cooling energy requirement for the previous year, Zain can estimate the total energy consumption increases that would result from the impact of that physical risk. When mapped to Zain's risk criteria, this is Moderate as it represents approximately 1.96% of annual EBITDA.

The risk is said to manifest across all seven countries of operation, as the underlying energy consumption data is an aggregate from operations.

To mitigate the increase in energy consumption associated with heightened cooling requirements, Zain implemented a series of initiatives under its strategic pillar of operational effectiveness. In 2025, Zain deployed a total of 140 outdoor cabinets across its operating markets, all of which were installed in Bahrain at a cost of USD 1,531,188. While these outdoor cabinets do not eliminate the need for active cooling, it significantly reduces reliance on energy-intensive systems. The deployment of 140 outdoor cabinets featuring substantially higher energy efficiency compared to traditional telecom shelters incurred a total opex savings of USD 1.21m. Collectively, these initiatives resulted in a reduction of 806 metric tons of CO_2 emissions, with additional emission reductions expected to continue for at least the next five years, aligned with the operational lifetime of the installed equipment.



c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.

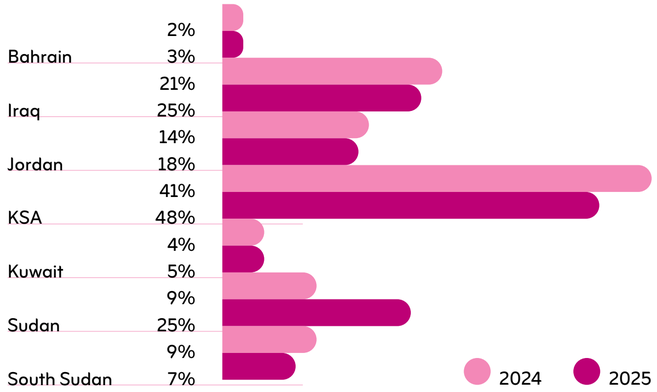
Zain is presenting a case study of a climate change risk, its impact, and the mitigation strategies.

Risk 1: Transition Risk: Increases in energy tariff will lead to an increase of energy costs for the operation of Zain's telecom/IT sites.

During the assessment of climate-related risks for Zain's core site, offices, and base station facilities, it was identified that there could be an increase in opex due to fuel tariff hikes and grid power units in Zain's areas of operations.

The biggest operating costs are energy-related to cater for cooling requirements for Zain's telecom and IT systems that require temperatures of approximately 23°C for optimum performance, which is much lower than ambient temperatures in Zain's markets of operation. Total energy consumption in 2025 was 128.4 M liters and 1240.39 GWh of diesel and grid across Zain's operating entities.

Energy cost contribution per OpCo



For the SSP2 – 4.5 2039 scenario, it is estimated that energy operating costs could increase by over 61% to USD 314.57 m. The estimated figures factor in the underlying per unit grid power and diesel fuel hikes as per macroeconomic indicators due to inflation and gradual reduction of subsidies.

The increase in costs is primarily due to:

1. Rise in energy tariffs due to inflation
2. Rise in mean temperatures

Zain estimates the increase in tariffs per liter of diesel and per kWh of grid power as per inflation rates in each of the company's opcos due to varying macroeconomic profiles.

Mitigation

Zain's network deployment guidelines require that passive infrastructure-sharing with other operators be prioritized as the first option before considering alternative approaches. Site sharing generally leads to reductions in energy consumption through the optimal utilization of power systems. This approach is particularly advantageous in countries such as Sudan and South Sudan, where most Zain's base stations rely on diesel generators due to limited grid stability. In these markets, reducing fuel consumption provides the dual benefit of lowering energy costs and decreasing emissions.

Based on historical electricity tariffs, fuel price trends, and an analysis of operational data across Zain's operating companies, it is estimated that if current patterns persist, the operating costs of Zain's base stations could double by 2035. For example, in Sudan and South Sudan, where most sites are powered by diesel generators, any increase in fuel prices directly translates into higher energy costs. To mitigate this risk, Zain deployed 158 solar power solutions and 651 battery-hybrid power systems in 2025. These deployments are expected to result in an estimated 40 – 80% reduction in fuel consumption for solar solutions implementation and 25 – 45% reduction in fuel consumption for battery hybrid solutions over the five-year period beginning in 2025. To mitigate the risks associated with additional energy costs, Zain has developed a set of initiatives ranging from infrastructure sharing to the deployment of green power solutions, and the use of smaller size diesel generators.

Metrics and Targets

The information included below reflects figures and analysis for the years 2024 and 2025.
Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.
Metrics used by Zain include emissions, energy consumption, and capital deployment.

Metrics	Performance	
	2024	2025
Energy		
Diesel Fuel Consumption (Liters)	Diesel fuel consumption decreased by 11% year-on-year (Y-o-Y) across all operations compared to 2023.	Diesel fuel consumption increased by 7.6% Y-o-Y across all operations compared to 2024.
Grid Consumption (KWh)	The total electricity consumption increased by 2% across all operations compared to 2023.	The total electricity consumption increased by 4.4% across all operations compared to 2024.
Average Fuel price per Liter	Bahrain - 0.52 Iraq - 0.5 Jordan - 1.19 KSA - 0.31 Kuwait - 0.4 Sudan - 1.6 South Sudan - 2.24	Bahrain - 0.52 Iraq - 0.5 Jordan - 1.03 KSA - 0.31 Kuwait - 0.4 Sudan - 1.6 South Sudan - 2.8
Average Grid unit price	Bahrain - 0.077 Iraq - 0.09 Jordan - 0.18 KSA - 0.08 Kuwait - 0.016 Sudan - 0.1 South Sudan - 2.77	Bahrain - 0.077 Iraq - 0.09 Jordan - 0.18 KSA - 0.08 Kuwait - 0.016 Sudan - 0.1 South Sudan - 0.44
Capital Deployment		
Investment in climate mitigation	Site Sharing Expenditure: • 41 infrastructure sharing sites • Site Optimization Expenditure: • Deployment of 140 outdoor cabinets • Inverter-Based cooling systems on 81 sites Energy Efficiency Expenditure: • The deployment of 10 smaller size diesel generators, • The implementation of 158 solar solutions and • The deployment of 651 hybrid battery solutions, as well as • The connection of 330 sites to commercial power • All these initiatives led to a Capex expenditure of USD9,103,931	• 41 infrastructure sharing sites for a cost of USD 184,900 • The deployment of 140 outdoor sites for a cost of USD 1,531,188 • Installation of 81 inverter-based cooling systems for USD 115,830 • The deployment of smaller size diesel generators for USD 61,201 • The installation of 218 DG hybrid solutions for USD 3,775,000 • The installation of additional 433 DG-Battery Hybrid solutions through our TowerCo Partners. • The installation of 10 smaller-size generators for USD 61,201 • Implemented 158 solar hybrid solutions for USD 2,725,000 • Connected 330 sites to the grid for USD 710,812

a. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 GHG emissions and the related risks.

The following tables summarize the GHG emissions and related risks for 2023 across Zain Group.

GHG emissions

Scope of emission	Unit	Total
Scope 1 emissions	tCO_2e	358,605.16
Scope 2 emissions	tCO_2e	683,974.68
Total Scope 1 & 2 emissions	tCO_2e	1,042,579,838
Total Scope 3 emissions	tCO_2e	480,403.68

Emissions risks

Scope	Related Risks	Summary
Scope 1 emissions	Increase in consumption of diesel.	The intermittent availability of grid power across certain operations—whether resulting from natural disruptions or man-made events may necessitate increased reliance on diesel generators as a backup energy source. Additionally, the rollout of 5G networks and the continued expansion of 4G coverage are expected to drive higher energy requirements, particularly for greenfield sites, which may further contribute to increased fuel consumption.
Scope 2 emissions	Increase in consumption of grid power.	The rollout of 5G networks and the continued expansion of 4G coverage are expected to drive higher energy requirements, particularly for greenfield sites, which may further contribute to increased fuel consumption.
Total Scope 3 emissions	Increase of both fuel and non-decarbonized grid utilization.	Increases in the use of fossil fuel-based energy or non-decarbonized sources of energy by our value chain suppliers and partners could increase both upstream and downstream emissions.

b. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

Initiatives	Target	Narrative
Enhance share of renewable power source	2.5% increase per year.	The current energy source mix between fossil fuel and renewable sources is 91.2% and 8.8% respectively. Zain intends to increase this mix by 2.5% annually to reduce Scope 1 and 2 emissions.
Scope 2 emissions	4.2% CO_2 emission reduction per year.	The rollout of 5G networks and the continued expansion of 4G coverage are expected to drive higher energy requirements, particularly for greenfield sites, which may further contribute to increased fuel consumption.
Virtualization of core network	75% in core.	Core network equipment such as CS Core, PS Core (2G,3G, 4G) and IMS for VoLTE require power on 24*7. The migration from legacy bare metal system design to virtualized core entails benefits of approximately 40% reduction in energy consumption as smaller equipment footprint translates to lower cooling and power consumption.
Digitalization	2.5% per year.	The current mix for prepaid recharges and postpaid payments between online and traditional channels is approximately 35:65. Zain intends to enhance the online segment as this will entail a reduction of branch operation costs due to savings in energy costs at the branches for lighting and air-conditioning.



20 Looking Forward

Zain 2025 Sustainability Report titled, "Grounded in Purpose, Growing Sustainably," demonstrates the company's impact on creating, preserving, or eroding value across the six integrated thinking capitals, Financial, Manufactured, Natural, Human, Intellectual, and Social. The company's transition toward a holistic approach to sustainability, reinforced by its recently introduced '4WARD-Progress with Purpose' five-year corporate strategy, reflects a natural evolution of its previous '4SIGHT' strategy, introducing new ambitions aligned to its core principles.

Following the introduction of the 4WARD strategy at the end of 2024, and the revision of the Corporate Sustainability Strategy at the end of 2025, the company conducted an in-depth analysis of its sustainability objectives to redefine its strategic objectives and priorities for the next five years. The new plan aims to ensure the company remains true to its mission and vision of enabling systemic change, addressing community deficits focusing on value creation because of the company's business activities.

The table below highlights Zain's future sustainability plans for 2026:

CORPORATE SUSTAINABILITY TARGET

Transition the company to be able to achieve Net Zero ambition by reducing greenhouse gas emissions, conserve nature, and biodiversity, and improve resource efficiency, including water and waste management practices.

COMMENTS

- Continued driving alignment across all Group functions, operating companies, and subsidiaries to ensure full implementation of SBTi-approved emission reduction targets, strengthening natural and financial capital through operational efficiency.
- Monitor progress on the rollout of the waste management compliance framework across operations, subsidiaries, and the supply chain.
- Assess value delivered on biodiversity initiatives and embed tech-driven solutions to enhance natural and intellectual capital.
- Further engagement with stakeholders, including regulators, to support policy reform through lobbying efforts for climate-related regulations and standards.
- Secure deeper supplier commitments toward net zero alignment.

IMPACTS ON CAPITALS

Transitioning to net zero strengthens natural capital by reducing emissions and natural resource use, while building intellectual and social and relationship capital through innovation, operational efficiency, and alignment to regulatory requirements. However, decarbonization and infrastructure upgrades require upfront investment, creating short-term pressure on financial capital.



CORPORATE SUSTAINABILITY TARGET

Bridge the digital divides that exist in Zain's operating markets, focusing on marginalized segments such as people with disabilities, women and youth, and the elderly.

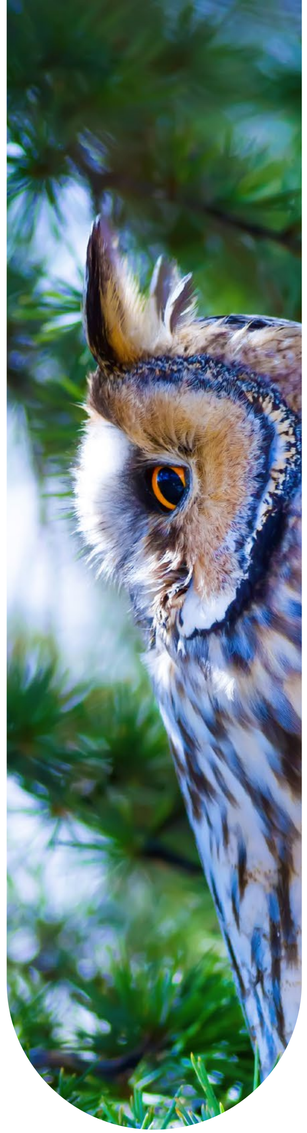
COMMENTS

- Assess accessibility across all customer touchpoints and establish comprehensive database to collect user feedback to drive process improvement supporting intellectual and social and relationship capital.
- Maintain engagement with the elderly community to enhance digital literacy and strengthen tailored data privacy measures.
- Further expand the Women in Tech program to meet targets, working closely with the Inclusion, Diversity, and Equity team to integrate women with disabilities and incorporate a financial inclusion component into the program.

IMPACTS ON CAPITALS

Expanding inclusive digital access strengthens human and social and relationship capital by increasing skills and participation in the online space while data-driven assessments contribute to the company's intellectual capital. Investments in accessibility and system adaptation result in short-term financial pressures.







CORPORATE SUSTAINABILITY TARGET

Ensuring a responsible and ethical supply chain across Zain's operations.

COMMENTS

- Utilize supplier engagement channels to gather feedback for future sustainability-related training programs.
- Build automated mechanisms for supplier sustainability risk assessments, covering both self-assessment questionnaires, physical audits, and policy alignment.
- Enhance supplier awareness on cybersecurity and data privacy, protecting intellectual and social and relationship capitals.

IMPACTS ON CAPITALS

Responsible supply chain practices enhance social and relationship and human capital through improved transparency, labor standards, and data protection. This also protects financial capital over the long term by reducing exposure to regulatory fines, compliance breaches, and reputational risk.

- Social & Relationship Capital
- Human Capital
- Financial Capital (risk mitigation)

CORPORATE SUSTAINABILITY TARGET

Build resilience for youth across the communities in which Zain operates, to be able to prosper and thrive.

COMMENTS

- Continuously assess challenges, gaps, and opportunities related to children's rights across all business operations.
- Advance efforts to meet the commitments under the GSMA Mobile Alliance to combat digital child sexual exploitation, safeguarding social and relationship capital while mitigating reputational and regulatory financial risk.
- Continue to drive advocacy on children's rights across Zain's value chain.
- Roll out the ZYxGreenSkills program across operating markets to equip youth with the skills needed to tackle climate change.
- Contribute to the development of entrepreneurs and the SME segment with the necessary skills to grow sustainably and generate new job opportunities enhancing financial, intellectual, and social and relationship capital.

IMPACTS ON CAPITALS

Youth and SME empowerment strengthens human, intellectual, and social and relationship capital through skills development, innovation, and community trust. Program delivery and capacity-building investments create short-term pressure on financial capital while supporting long-term value creation.

- Human Capital
- Intellectual Capital
- Social & Relationship Capital
- Financial Capital (risk mitigation)

CORPORATE SUSTAINABILITY TARGET

Expand and improve Zain's stakeholder engagement strategy across all functions.

COMMENTS

- The company remains committed to strengthening its stakeholder engagement practices through open, structured, and ongoing dialogue with key stakeholders. This is informed by the outcomes of the double materiality assessment and emerging sustainability trends. For further details on Zain's engagement approach, please refer to the 'Stakeholder Engagement' section on page 68.

IMPACTS ON CAPITALS

Stronger stakeholder engagement enhances social & relationship and intellectual capital by improving trust and transparency.

- Social & Relationship Capital
- Intellectual Capital

We look forward to receiving your thoughts and feedback on this report. Kindly send comments and/or questions to group.sustainability@zain.com

21 Appendix



ESG Metrics for Mobile

GSMA ESG METRICS FOR MOBILE INDUSTRY REPORTING FRAMEWORK

Time period (2025)		
ESG Metrics for Mobile code	**Definition**	**Time Period (calender year) 2025**
GSMA-ENV-01	Disclose if the company has set, or committed to set, GHG emissions targets that are in line with the goals of the Paris Agreement — to limit global warming to well below 2°C above pre-industrial levels and pursue efforts to limit warming to 1.5°C — and to achieve net-zero emissions before 2050	Zain Group's formal targets have been approved by the Science Based Targets initiative (SBTi). This was formally activated after initially issuing a commitment letter approved by SBTi and receiving an acceptance letter on October 17, 2024.
GSMA-ENV-02	The amount of GHG Protocol Scope 1 and 2 GHG emissions (e.g. carbon dioxide, methane, nitrous oxide, F-gases, etc) produced	1,042,579.84
	Percentage change in absolute Scope 1 and 2 emissions	-11.37%
	The amount of GHG Protocol Scope 3 GHG emissions produced	472,577.01
	Percentage change in absolute Scope 3 emissions	-4.15%
GSMA-ENV-03	The amount of energy consumed across the entire business operations	1.669 million MWh
	The amount of energy consumed across the mobile network	1.669 million MWh
	The percentage of network energy consumed that is generated by renewable energy sources	10.26%
	The percentage of network energy consumed that is generated by fossil fuels	66.65%
	The percentage of network energy consumed that is generated by diesel	23.09%
GSMA-ENV-04	The percentage of total network equipment prevented from becoming waste through repair or reuse, by units	Refer to Sustainability Agenda, page 101
	The percentage of total network equipment prevented from becoming waste through repair or reuse, by purchase price	Refer to Sustainability Agenda, page 101
	The percentage of handsets or CPE prevented from becoming waste through repair or reuse, by units	Refer to Sustainability Agenda, page 101
	The percentage of handsets or CPE prevented from becoming waste through repair or reuse, by purchase price	Refer to Sustainability Agenda, page 101

Time period (2025)		
ESG Metrics for Mobile code	**Definition**	**Time Period (calender year) 2025**
GSMA-ENV-05	Total amount of waste produced across the entire business operations	Refer to Sustainability Agenda, page 101
	Total amount of network equipment waste produced	Refer to Sustainability Agenda, page 101
	Total amount of handset and CPE waste produced	Refer to Sustainability Agenda, page 101
	Total amount of other waste produced	Refer to Sustainability Agenda, page 101
GSMA-ENV-06	The percentage of network equipment waste recycled, by units	Refer to Sustainability Agenda, page 101
	The percentage of handset and CPE equipment recycled, by units	Refer to Sustainability Agenda, page 101
	The percentage of other waste recycled, by units	Refer to Sustainability Agenda, page 101
GSMA-INC-03	Digital skills training programs must focus on establishing or improving at least one of the basic, intermediate or advanced digital skills identified in the ITU Digital Skills Toolkit	Refer to Sustainability Agenda, page 116
GSMA-INT-01	The total number of data breaches identified during the reporting period	In 2025, there were 0 reported cases related to breaches of customer privacy, data leaks, theft or loss.
GSMA-INT-02	A policy that specifically covers the protection of consumers' digital rights	Privacy Policy available via link
	The percentage of data breaches in which personal data was subject to the data breach	0, no incidences happened during reporting period.
	The total number of unique customers who were affected by data breaches	0, no incidences happened during reporting period.
	The number of instances in which a data protection violation resulted in regulatory action of any kind	0, no incidences happened during reporting period.
GSMA-INT-03	A policy that specifically covers the online safety of children and other vulnerable groups	Privacy Policy available via link

Time period (2025)		
ESG Metrics for Mobile code	**Definition**	**Time Period (calender year) 2025**
GSMA-SUP-01	The commissioning, purchase and management of goods, works and services in a way that reduces or negates negative ESG impacts within the supply chain	Supplier code of conduct is available via link
	The number of core elements of sustainable procurement (as defined by ISO 20400) covered in your sustainable procurement policy	We cover the following: • Human Rights • Labour Practices • Enviroment • Fair operating practices • Community involvement and development (not included in the supplier code of conduct, however we train our suppliers on various sustainability topics)"
GSMA-SUP-02	Percentage of all active suppliers that have been screened against the sustainable procurement policy	905 of active suppliers
	Percentage of all active suppliers that have been assessed against the sustainable procurement policy through physical site visits	4% physical audit (53 physical audits across zain operations), 51% self-assessment questionnaire (660 suppliers in total)

SASB - Telecommunication Sector

SASB STANDARDS
Now part of IFRS Foundation

Topic	SASB Code	SASB Standard/Metric	Section	Comments	External Assurance
	TC-TL-000.A	Wireless Subscribers		45,140	
	TC-TL-000.C	Broadband Subscribers		5,719	
	TC-TL-000.D	Network Traffic,percentage on cellular network, and percentage on fixed network		44.478 PByte	
Environmental Footprint of Operations	TC-TL-130a.1	Total energy consumed		6,006,786 Gigajoules	Yes
		Percentage grid electricity		66.6%	
		Percentage renewable energy		10.25%	
Data Privacy	TC-TL-220a.1	Description of policies and practices relating to behavioral advertising and customer privacy	Enterprise Risk Management		Yes
	TC-TL-220a.2	Number of customers whose information is used for secondary purposes	Enterprise Risk Management		Yes
	TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy		This information is considered confidential, as such Zain does not disclose this indicator.	Yes
	TC-TL-220a.4	1. Number of law enforcement requests for customer information		This information is considered confidential, as such Zain does not disclose this indicator.	Yes
		2. Number of customers whose information was requested			Yes
		3. Percentage resulting in disclosure			Yes
Data Security	TC-TL-230a.1	1. Number of data breaches	Enterprise Risk Management		Yes
		2. Percentage involving personally identifiable information (PII)	Enterprise Risk Management		
		3. Number of customers affected	Enterprise Risk Management		
	TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Enterprise Risk Management		Yes

Topic	SASB Code	SASB Standard/Metric	Section	Comments	External Assurance
Product End-of-Life Management	TC-TL-440a.1	1. Materials recovered through take back programs, percentage of recovered materials that were, (2) reused, (3) recycled and (4) landfilled	Sustainability Agenda		Yes
Managing Systemic Risks from Technology Disruptions	TC-TL-550a.1	1. System average interruption frequency and		Zain does not yet report on this metric.	Yes
		2. Customer average interruption duration			
	TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	Enterprise Risk Management		Yes
Competitive Behavior & Open Internet	TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations		This information is considered confidential, as such Zain does not disclose this indicator.	Yes
	TC-TL-520a.2	Average actual sustained download speed of		Zain does not yet report on this metric	
		1. Owned and commercially associated content			
		2. Non-associated			
	TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating, and related practices		Zain does not yet report on this metric	

Global Reporting Initiative (GRI)

General Disclosure		Section	Comments	External Assurance
2-1	Organizational details	About the Report Company Overview		Yes
2-2	Entities included in the organization's Sustainability Reporting	About the Report		Yes
2-3	Reporting period, frequency and contact point	About the Report		Yes
2-4	Restatements of information		There is no significant information restated in the 2025 Report	Yes
2-5	External Assurance	About the Report Independent Assurance Report		Yes
2-6	Activities, value chain and other business relationships	About the Report Products & Services		Yes
2-7	Employees	People & Purpose		Yes
2-8	Workers who are not employees	People & Purpose		Yes
2-9	Governance structure and composition	Corporate Governance		Yes
2-10	Nomination and selection of the highest governance body	Corporate Governance		Yes
2-11	Chair of the highest governance body	Corporate Governance		Yes
2-12	Role of the highest governance body in overseeing the management of impacts	Corporate Governance		Yes
2-13	Delegation of responsibility for managing impacts	Corporate Governance		Yes
2-14	Role of the highest governance body in sustainability reporting	Corporate Governance		Yes
2-15	Conflicts of interest	Corporate Governance		Yes
2-16	Communication of critical concerns	Corporate Governance		Yes
2-17	Collective knowledge of the highest governance body	Corporate Governance		Yes
2-18	Evaluations of the performance of the highest governance body	Corporate Governance		Yes
2-19	Remuneration policies	Corporate Governance		Yes
2-20	Process to determine remuneration	Corporate Governance		Yes

General Disclosure		Section	Comments	External Assurance
2-21	Annual total compensation ratio	Corporate Governance		Yes
2-22	Statement on sustainable development strategy	Message from the Board of Directors Message from the Vice-Chairman and Group CEO Message from the Corporate Sustainability Officer		Yes
2-23	Policy commitments	Corporate Governance Human Rights		Yes
2-24	Embedding policy commitments	Corporate Governance Human Rights		Yes
2-25	Processes to remediate negative impacts	Human Rights		Yes
2-26	Mechanisms for seeking advice in raising concerns	Corporate Governance Human Rights		Yes
2-27	Compliance with laws and regulations		In accordance with the regulations issued by the Capital Markets Authority (CMA) in Kuwait, material information includes any significant event, transaction, or change affecting the Company's financial position, operations, or stock performance. Zain will have to disclose major transactions (acquisitions, joint ventures, contracts), financial and operational changes (new products, lawsuits, regulatory impacts, fines, and corporate governance updates (management or board changes). Disclosures also cover meeting results, financial statements, trading suspensions, and related party transactions exceeding 5% of assets. Extraordinary events like shutdowns or compensations must be reported. By adhering to these principles, we ensure that our assessments prioritize transparency, market integrity, and regulatory compliance. Only material information within defined parameters is disclosed to prevent market disruption and ensure stakeholders receive relevant and significant updates.	Yes
2-28	Membership associations	Company Overview Enterprise Risk Management		Yes
2-29	Approach to stakeholder engagement	Stakeholder Engagement		Yes
2-30	Collective bargaining agreements		Bede: Full time 6% Zain Iraq Full time: 5% Part time 3% Zain Sudan: Full time 100% Zain Jordan: Full time : 0.23%	Yes

Disclosure on Material Topics		Section	Comments	External Assurance
3-1	Process to determine material topics	Materiality Assessment		Yes
3-2	List of material topics	Materiality Assessment		Yes
3-3	Management of material topics	Materiality Assessment		Yes

Topic Specific Disclosures

Number	Material Topics - Based on Materiality Assessment	Section	Comments	External Assurance
GRI 418 - Customer Privacy				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Enterprise Risk Management		Yes
GRI 416 - Customer Health and Safety				
416-1	Assessment of the health and safety impacts of product and service categories		In accordance to industry standards, the company ensures that all its products and services are in accordance to health and safety best practices when it comes to network equipment. When it comes to launching new products and services into the market, the company abides by health and safety standards set by the local regulatory entities. Furthermore, the company covers all health and safety impacts of its products and services in its Environmental and Social Management Plan (ESMP) which includes public exposure to Electro- Magnetic Fields, compliance to International Commission on Non-Ionizing Radiation Protection (ICNIRP).	Yes
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services"		There has been 0 incidents concerning health and safety of Zain's products and services.	Yes
GRI 405 - Diversity and Equal Opportunity				
405-1	Diversity of governance bodies and employees	Corporate Governance People & Purpose		Yes
405-2	Ratio of basic salary and remuneration of women to men	People & Purpose		Yes
GRI 205 - Anti-Corruption				
205-1	Operations assessed for risks related to corruption		100% of Zain's operations are assessed for fraud risks and violations of the Code of Conduct which include anti-corruption risks	Yes
205-2	Communication and training about anti-corruption policies and procedures	Corporate Governance	Through its onboarding process, the company communicates its anti-corruption policies and procedures to all new joiners. Furthermore, it ensures that such policies and procedures are accessible to all through the company's internal portal.	Yes
205-3	Confirmed incidents of corruption and actions taken		There were 0 incidents in 2025	Yes
GRI 202 - Market Presence				
202-1	Ratios of standard entry level wage by gender compared to local minimum wage		This indicator is not relevant to the industry we operate in, as such data is not collected for this measure. The company's pay scales are reviewed on regular basis and adhere to each operating country's labor law guidelines.	Yes
202-2	Proportion of senior management hired from the local community	People & Purpose		Yes
GRI 413 - Local Communities				
413-1	Operations with local community engagement, impact assessments, and development programs		100% of our operations include local community engagement and development programs	Yes

Topic Specific Disclosures

Number	Material Topics - Based on Materiality Assessment	Section	Comments	External Assurance
413-2	Operations with significant actual and potential negative impacts on local communities	Sustainability Agenda	The company aligns to the Zain Environmental and Social Management Plan (ESMP) Guidelines. The ESMP Guidelines were developed to minimize Zain's potential harmful environmental impacts, protect the safety of its surrounding communities and address negative impacts 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 grievance 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.	Yes
GRI 204 - Procurement Practices				
204-1	Proportion of spending on local suppliers	Products and Services		Yes
GRI 201 - Economic Performance				
201-1	Direct economic value generated and distributed	Products and Services		Yes
201-2	Financial implications and other risks and opportunities due to climate change	Sustainability Agenda TCFD Report		Yes
GRI 305 - Emissions				
305-1	Direct (Scope 1) GHG emissions	Sustainability Agenda		Yes
305-2	Energy indirect (Scope 2) GHG emissions	Sustainability Agenda		Yes
305-3	Other indirect (Scope 3) GHG emissions	Sustainability Agenda		Yes
GRI 406 - Non Discrimination				
406-1	Incidents of discrimination and corrective actions taken		0 cases were reported in 2025.	Yes
GRI 401 - Employment				
401-1	New employee hires and employee turnover	People & Purpose		Yes
401-2	Benefits provided to full-time employees that are not provided to temporary or parttime employees		Found in Zain's Financial Statement on Page 30 and 31 on the pdf	Yes
401-3	Parental leave	People & Purpose		Yes
GRI 308 - Supplier Environmental Assessment				
308-1	New suppliers that were screened using environmental criteria	Products and Services		Yes
308-2	Negative environmental impacts in the supply chain and actions taken	Products and Services	There were no negative environmental impacts identified through Zain's supply chain in 2025.	Yes

Topic Specific Disclosures				
Number	**Material Topics - Based on Materiality Assessment**	**Section**	**Comments**	**External Assurance**
GRI 203 - Indirect Economic Impact				
203-1	Infrastructure investments and services supported	Products and Services Sustainability Agenda		Yes
203-2	Significant indirect economic impacts	Products and Services Sustainability Agenda	There were no negative environmental impacts identified through Zain's supply chain in 2025.	Yes
GRI 414 - Supplier Social Assesssment				
414-1	New suppliers that were screened using social criteria	Products and Services		Yes
414-2	Negative social impacts in the supply chain and actions taken	Products and Services	There were no negative social impacts identified through Zain's supply chain in 2025.	Yes

TCFD Recommendations

TCFD Recommendations		External Assurance
Governance	a. Describe the board's oversight of climate-related risks and opportunities.	Yes
	b. Describe management's role in assessing and managing climate-related risks and opportunities.	Yes
Strategy	a. Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	Yes
	b. Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.	Yes
	c. Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Yes
Risk Management	a. Describe the organization's processes for identifying and assessing climate-related risks.	Yes
	b. Describe the organization's processes for managing climate-related risks.	Yes
	c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	Yes
Metrics and Targets	a. Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	Yes
	b. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks.	Yes
	c. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	Yes

22 Independent Assurance Report



Shape the future with confidence

Independent practitioner's assurance report on Greenhouse Gas (GHG Scope 1, Scope 2 and Scope 3) Statement

To the Board of Directors and Management of Mobile Telecommunications Company K.S.C.P.

Scope

We have been engaged by Mobile Telecommunications Company K.S.C.P. ("Zain Group") to perform a 'limited assurance engagement,' as defined by International Standards on Assurance Engagements, here after referred to as the engagement, to report on material areas / performance metrics (as described below, the "Subject Matter") in Zain Group's 2025 Sustainability Report (the "Report") for the year ended 31 December 2025.

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

Our limited assurance engagement covered disclosures reported in full or partially by Zain Group in the Report against the indicators in the Global Reporting Initiative Sustainability Reporting Standards 2021 (GRI Standards), Sustainability Accounting Standards Board (SASB) Telecommunication Services Sustainability Accounting Standard Codes and, Recommendations of the Task Force on Climate-related Financial Disclosures June 2017 (TCFD). Our assurance is limited to indicators as specified in the table below:

Global Reporting Initiative (GRI)	• The organization and its reporting practices: 2-1, 2-2, 2-3, 2-4, 2-5 • Activities and workers: 2-6, 2-7, 2-8 • Governance: 2-9, 2-10, 2-11, 2-12, 2-13, 2-14, 2-15, 2-16, 2-17, 2-18, 2-19, 2-20 • Strategy, policies and practices: 2-22, 2-23, 2-24, 2-25, 2-26, 2-27, 2-28 • Stakeholder engagement: 2-29, 2-30 • Disclosure on material topics: 3-1, 3-2, 3-3 • Economic performance: 201-2 • Market presence: 202-2 • Indirect economic impacts: 203-1, 203-2 • Procurement practices: 204-1 • Anti-Corruption: 205-1, 205-2, 205-3 • Energy: 302-1 • Supplier environmental assessment: 308-1, 308-2 • Employment: 401-1, 401-3 • Diversity and equal opportunity: 405-1, 405-2 • Local communities: 413-1, 413-2 • Supplier assessment for labor practices: 414-1, 414-2 • Customer health and safety: 416-1, 416-2 • Customer privacy: 418-1
Sustainability Accounting Standards Board (SASB)	• Environmental footprint of operations: TC-TL-130a.1 • Data privacy: TC-TL-220a.1, TC-TL-220a.2 • Data security: TC-TL-230a.1, TC-TL-230a.2
Taskforce on Climate-Related Financial Disclosures (TCFD)	• Governance – Board oversight and management role in assessing and managing climate-related risks and opportunities. • Strategy – Climate-related risks and opportunities identified and its impact on the organization along with the climaterelated scenario analysis. • Risk management – Organization process of identifying, assessing and managing climate-related risks and the integration of these into the organization's overall risk management. • Metrics & targets – Metrics includes energy consumption and emissions.

The scope excludes future events or the achievability of objectives, targets and expectations of Zain Group. EY has not conducted an audit, review or conduct an examination of any of the Zain Group's financial statements or any other financial information.

Criteria applied by Zain Group

In preparing the Subject Matter, Zain Group applied the Global Reporting Initiative Sustainability Reporting Standards (GRI Standards), the Sustainability Accounting Standards Board (SASB) Telecommunication Services Sustainability Accounting Standard and, Recommendations of the Task Force on Climate-related Financial Disclosures June 2017 (TCFD) (Collectively the "Criteria")

Zain Group's responsibilities

Zain Group's management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

EY's responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ('ISAE 3000 (Revised)') and the terms of reference for this engagement as agreed with Zain Group on 15th September 2025. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.

Our independence and quality management

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement beenperformed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the subject matter and related information, and applying analytical and other appropriate procedures.

Our procedures included:

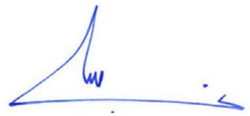
a. Conducted interviews with personnel in the Group Corporate Sustainability Department,
   Networks team, Procurement team, Human Resource team and Legal and Risk Management team to understand the business and reporting process;
b. Conducted interviews with key personnel to understand the process for collecting, collating and reporting the Subject Matter during the reporting period;
c. Checked documents and internal communications received by the Group Corporate Sustainability Department to validate the accuracy of information reported;
d. Checked that the calculation criteria have been correctly applied in accordance with the methodologies outlined in the Criteria;
e. Undertook analytical review procedures over the Subject Matter and made inquiries of relevant personnel;
f. Tested, on a sample basis, underlying source information to check the accuracy of the data;
g. Tested the disclosure and presentation of the subject Matter within the report against the criteria.

We also performed such other procedures as we considered necessary in the circumstances.

Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that need to be made to the subject matter as of 31 December 2025 and for the period 1 January to 31 December 2025, in order for it to be in accordance with the Criteria.

For Ernst & Young (Al Aiban, Al Osaimi & Partners)



Signed by Bader AlAbduljader
02 April 2026
Kuwait

Shape the future
with confidence

Independent practitioner's assurance report

To the Board of Directors and Management of Mobile Telecommunications Company K.S.C.P.

Scope

We have undertaken a reasonable assurance engagement of the accompanying GHG statement of Mobile Telecommunications Company K.S.C.P. ("Zain Group") for the year ended 31 December 2025, comprising the Emissions Inventory Scope 1, Scope 2 and Scope 3, (the "Subject Matter"), contained in Zain Group's 2025 Sustainability Report (the "Report"). Our assurance is limited to indicators as specified in the table below:

Global Reporting Initiative (GRI)	• Emissions: 305-1(Scope 1) • Emissions: 305-2(Scope 2) • Emissions: 305-3 (Scope 3)

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express an opinion on this information.

Criteria applied by Zain Group

In preparing the Subject Matter, Zain Group applied the Global Reporting Initiative Sustainability Reporting Standards (GRI 305-1, GRI 305-2 and GRI 305-3) and the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard (the "Criteria").

Zain Group's responsibilities

Zain Group's management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the GHG statement such that it is free from material misstatement whether due to fraud or error.

EY's responsibilities

Our responsibility is to express an opinion on the presentation of the Subject Matter based on the evidence we have obtained. We conducted our engagement in accordance with the International Standard for Assurance Engagements ISAE 3410 Assurance engagements on Greenhouse Gas Statements ('ISAE 3410'), issued by the International Auditing and Assurance Standards Board. That standard requires that we plan and perform this engagement to obtain reasonable assurance about whether the GHG statement is free from material misstatements. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence we have obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our independence and quality management

We have complied with the independence and other ethical requirements of the International Ethics Standards Board of Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

The firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements

Description of procedures performed

A reasonable assurance engagement in accordance with ISAE 3410 involves performing procedures to obtain evidence about the quantification of emissions and related information in the GHG statement. A reasonable assurance engagement also includes:

- Considering internal controls relevant to Zain Group's preparation of the GHG statement.
- Assessing the suitability in the circumstances of Zain Group's use of the Criteria;
- Evaluating the appropriateness of quantification methods and reporting policies used, and the reasonableness of estimates made by Zain Group and
- Evaluating the overall presentation of the GHG statement.

We also performed such other procedures as we considered necessary in the circumstances.

We have verified only activity level data for Category 1 and Category 2 of the Scope 3 emissions.

The Green House Gas quantification process is subject to scientific uncertainty, which arises because of incomplete scientific knowledge about the measurement of GHGs. Additionally,

GHG procedures are subject to estimation (or measurement) uncertainty resulting from the measurement and calculation processes used to quantify emissions within the bounds of existing scientific knowledge.

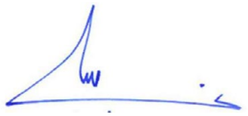
Our procedures included:

a. Conducted interviews with personnel in the Group Corporate Sustainability Department, and the Networks team, to understand the business and reporting process;
b. Conducted interviews with key personnel to understand the process for collecting, collating and reporting the Subject Matter during the reporting period;
c. Checked documents and internal communications received by the Group Corporate Sustainability Department to validate the accuracy of information reported;
d. Checked that the calculation criteria have been correctly applied in accordance with the methodologies outlined in the Criteria;
e. Undertook analytical review procedures over the Subject Matter and made inquiries of relevant personnel;
f. Tested underlying source information to check the accuracy of the data;
g. Tested the disclosure and presentation of the subject Matter within the report against the criteria.

Opinion

In our opinion, the GHG Emissions Scope 1, Scope 2 and Scope 3 data as of 31 December 2025, and for the period 1 January to 31 December 2025, is presented, in all material respects, in accordance with GRI 305-1, GRI 305-2 and GRI 305-3.

For Ernst & Young (Al Aiban, Al Osaimi & Partners)



Signed by Bader AlAbduljader
02 April 2026
Kuwait

Contact List

ZAIN GROUP
Head Office Building,
P.O. Box 22244
13083 Safat,
Kuwait City, Kuwait
Tel: +965 2464 4444
Fax: +965 2464 1111
www.zain.com

ZAIN KUWAIT
P.O. Box 22244
13083 Safat,
Kuwait City, Kuwait
Tel: +965 2464 4444
Fax: +965 2464 1111
www.kw.zain.com

ZAIN BAHRAIN
Zain Tower, Building No. 401
Road No. 2806
Seef District 428
P.O. Box 266
Kingdom of Bahrain
Tel: +973 3603 1000
Fax: +973 1758 1117
www.bh.zain.com

ZAIN IRAQ
Building 47, Street 14
District 605 Hay Al Mutanabi Al
Mansoor,
Baghdad, Iraq
Tel: +964 1541 0840
Fax: +964 1541 8611
www.iq.zain.com

ZAIN JORDAN
King Abdullah the second street,
Building#421
PO Box:- 940821
Amman-Jordan

ZAIN SAUDI ARABIA
Granada Business Park,
Building A3
2594, Alshuhada District, Exit 8
P.O. Box 295814
Riyadh 11351,
Kingdom of Saudi Arabia
Tel: +966 592 444 444
www.sa.zain.com

ZAIN REPUBLIC OF SUDAN
Al Mogran, ACOLID Building
Al Ghabra Street,
P.O. Box 13588
Khartoum, Sudan
Tel: +249 912 398 100
ZAIN SOUTH SUDAN
Munderi Road
Haya Jabal, Gudele
Juba, C.E
Republic of South Sudan
Tel: +211 912 399 221

ZAINTECH
Dubai Internet City
Building 11 – Office 201
P.O. Box 50007
United Arab Emirates
Tel: +971 (04) 360 1622
www.zaintech.com

ZAIN AND OMANTEL (ZOI)
Zain Omantel International FZ-LLC
(ZOI)
Building 11, First Floor, 109-110
Dubai Internet City
United Arab Emirates