

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 and child rights violations raised.

During this period, there were no human or children rights abuses committed under Zain’s scope.

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

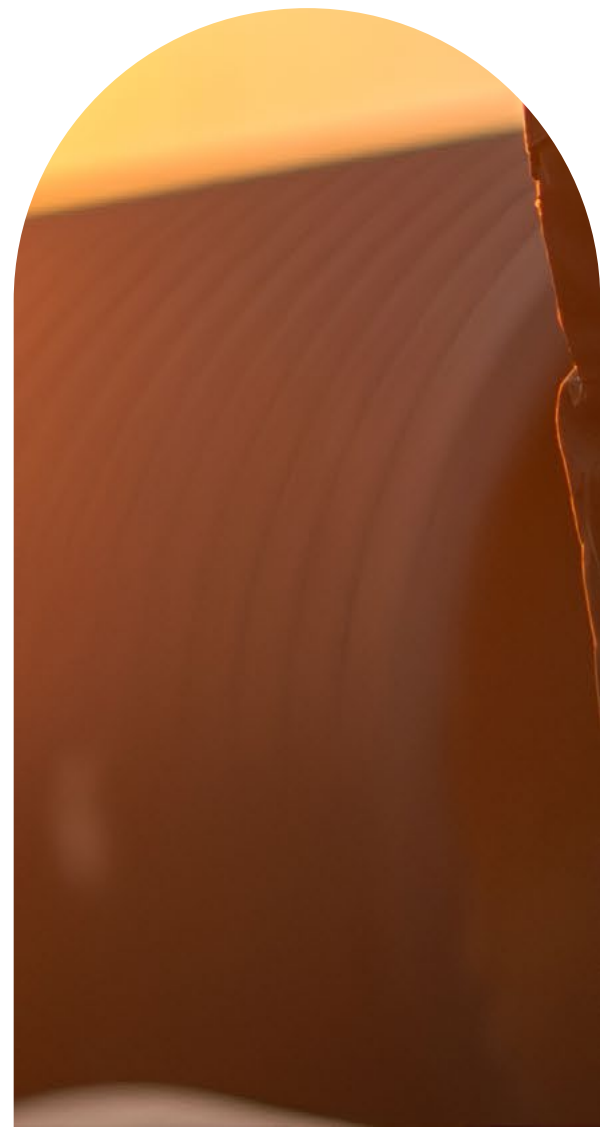
Stakeholder Engagement

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	MATERIAL TOPIC Mobile Communications and Health	MATERIAL TOPIC Customer Privacy and Data Security	MATERIAL TOPIC Children’s Rights	MATERIAL TOPIC Digital Inclusion	MATERIAL TOPIC Human Rights	MATERIAL TOPIC Human Rights
SUB-TOPIC Labor Rights, Treatment and Safety	SUB-TOPIC Public Safety	SUB-TOPIC Customers’ Right to Privacy	SUB-TOPIC Children’s Rights	SUB-TOPIC Digital Inclusion	SUB-TOPIC Upholding International Best Practices	SUB-TOPIC Freedom of Association
RISK Poor working conditions or safety incidents, which can lead to legal liabilities, increased insurance fees, and reputational harm.	RISK The impact of mismanaged EMF radiation concerns or tower-site accidents on regulatory and legal issues.	RISK Data breaches or misuse of personal data may result in fines, customer loss, loss of trust, or reputational damage.	RISK Inadequate safeguards expose children to risks such as exploitation, harmful content, cyber bullying, and privacy breaches.	RISK Limited access for marginalized groups hinders the ability to achieve digital transformation in an inclusive manner.	RISK Gaps in due diligence on human rights risks in operations or supply chains can lead to legal and reputational risks.	RISK Restricting employees’ rights to collective bargaining can impact retention and productivity rates.
OPPORTUNITY Stringent practices to ensure worker safety, which impacts retention rates, absenteeism, and productivity.	OPPORTUNITY Transparent communication on towers and sites’ impact on EMF radiation builds community trust.	OPPORTUNITY Stringent practices to ensure worker safety, which impacts retention rates, absenteeism, and productivity.	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.	OPPORTUNITY Being inclusive in the approach to digital transformation can provide access to new markets and boost innovation.	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.	OPPORTUNITY Respecting freedom of association fosters collaboration, compliance, and a healthy culture.
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.	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.	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.	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.	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.	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.	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.
Human Capital Social & Relationship Capital Financial Capital	Social & Relationship Capital Financial Capital Manufactured Capital	Social & Relationship Capital Financial Capital Intellectual Capital	Social & Relationship Capital Financial Capital Intellectual Capital	Social & Relationship Capital Financial Capital Intellectual Capital Financial Capital (short term)	Social & Relationship Capital Financial Capital Manufactured Capital	Human Capital Social & Relationship Capital Financial Capital Manufactured Capital