Environmental Social and Corporate Governance (ESG) Sustainability Policy

1. Purpose

This Policy establishes the general framework through which Ooredoo Kuwait integrate environmental sustainability, social responsibility, and corporate governance into their strategies and operations. It aims to reduce environmental impact, support community well-being, uphold inclusivity and diversity, strengthen transparency and accountability, and align the organization with applicable national and international sustainability frameworks, including the United Nations Sustainable Development Goals (SDGs).

2. Scope

This Policy applies to all employees in Ooredoo Kuwait and its subsidiaries (FAST Telco and Phono)

3. Applicability

Ooredoo Kuwait shall apply the provisions of this Policy across relevant strategies, operations, governance structures, risk-management activities, reporting processes, and internal policies.

This Policy shall be distributed and communicated to relevant stakeholders and made available for review within the organization.

4. Definitions

For applying the provisions of this Policy, the following words and phrases shall have the meanings assigned to each of them unless the context indicates otherwise:

Ooredoo	National Mobile Telecommunications Company (K.S.C.P) and its subsidiaries in Kuwait.
The Group	Ooredoo, a Qatari Public Shareholding Company (Q.P.S.C.).
Operational Companies	Subsidiaries of National Mobile Telecommunications Company K.S.C.P inside Kuwait and companies directly or indirectly controlled or administratively influenced by Ooredoo, including its executive management, whose financial results are reflected in the consolidated financial statements of National Mobile Telecommunications Company K.S.C.P.
The Board	The Board of Directors of National Mobile Telecommunications Company K.S.C.P, or Operational Companies, as applicable.
The Committee	The Remuneration, Nomination, and Sustainability Committee, or the Audit and Risk Management Committee, as applicable.

Policy	The Environmental, Social, and Corporate Governance (ESG) Sustainability Policy.
Sustainable Development	A strategic approach focused on integrating environmental, social, and corporate governance dimensions to meet the needs of the present without compromising the ability of future generations to meet their own needs. It includes preserving natural resources, promoting societal well-being, and ensuring transparency and accountability in institutional operations to achieve inclusive and sustainable growth.
Environmental Sustainability	Processes and policies aimed at minimizing negative environmental impacts.
Social Responsibility	Actions and initiatives that enhance societal well-being and support sustainable development.
International Sustainability Disclosure Standards	Any standards or frameworks issued by internationally recognized entities, such as the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), and the Task Force on Climate-related Financial Disclosures (TCFD).
Corporate Governance	The system through which Ooredoo is managed, including the foundations for distributing rights and responsibilities among stakeholders, thereby promoting transparency and accountability.
Competent Administrative Unit	The department responsible for implementing the provisions of this Policy, which may include the Sustainability Department, Finance Department, Corporate Governance Department, Compliance Department, Technology Department and Human Resources Department, as applicable.
Sustainability Team	Oversee the implementation of the company's sustainability agenda and ensuring alignment with approved policies and strategic objectives.
Executive Management	The management responsible for routine operations in Ooredoo (K.S.C.P.), or Operational Companies, as applicable, executing the Board's decisions and directives, proposing strategic decisions, and implementing them. This includes the CEO, Deputy CEO, and administrative heads directly reporting to the CEO.

5. Policy Objectives

This Policy sets out the general objectives that Ooredoo and its Operational companies aim to achieve in the areas of environmental sustainability, social responsibility, and corporate governance, as follows:

1. Reduce the environmental impact of Ooredoo and the Operational Companies and enhance the sustainable use of natural resources.

2. Support community well-being by upholding social responsibility and adopting practices of inclusivity and diversity.

3. Achieve sound governance that ensures transparency and accountability, reinforcing the trust of investors and stakeholders in Ooredoo and the Operational Companies.

4. Adhere to national and international normative frameworks in the areas of environment, social responsibility, and governance, including the United Nations Sustainable Development Goals (SDGs).

6. Policy Pillars

This Policy seeks to establish a comprehensive framework that supports the Ooredoo's efforts toward sustainable development. It is structured around three main pillars, reflecting the commitment of Ooredoo and the Operational Companies to their core values and responsibilities to the environment, society, and stakeholders, as follows:

6.1 First: Environmental Sustainability

Ooredoo and the Operational Companies commit to reducing the environmental impact of their operations through the following:

- Increasing the use of renewable energy and reducing reliance on fossil fuels.
- Setting targets to reduce carbon emissions and improve energy efficiency.
- Adopting measures to conserve water and electricity and minimize waste.
- Enhancing Ooredoo's capacity to adapt to risks associated with climate change.
- Adopting operational practices aimed at minimizing resource waste, reusing materials and equipment, and recycling waste generated from operational processes, thereby enhancing environmental efficiency and extending the lifespan of utilized resources.

6.2 Second: Social Responsibility

Ooredoo and the Operational Companies commit to strengthening their obligations toward society through the following:

- Supporting the local community and investing in social responsibility programs, including in education, health, and economic development.
- Providing training programs for employees and promoting inclusivity and equal opportunities.
- Ensuring a work environment that respects diversity and prevents discrimination of all kinds.
- Strengthening communication channels with all stakeholders to achieve a lasting positive impact.

6.3 Third: Governance

Ooredoo and the Operational Companies commit to applying the highest standards of governance, as follows:

- Full compliance with applicable laws and regulations.
- Preparing periodic and transparent reports that include both financial and non-financial performance.
- Identifying and managing environmental and social risks to ensure the sustainability of operations.
- Adopting strict policies to prevent corruption and uphold professional conduct standards.

7. Ooredoo Commitments

Ooredoo and the Operational Companies commit to implementing the provisions of this Policy and achieving its objectives, as follows:

- Preparing annual reports on Ooredoo's performance in the fields of sustainability and governance, utilizing international sustainability disclosure standards, and submitting them to the relevant entities in accordance with legal requirements, during the first quarter of the year following the end of the fiscal year.
- Reviewing and updating this Policy periodically, in alignment with legislative changes and best practices.
- Providing awareness programs for all employees on the importance of sustainability and governance practices and their impact on Ooredoo and the community.

- Cooperating and coordinating with regulatory authorities to ensure that this Policy aligns with national and international standards.
- Ensuring consistency between this policy and other relevant internal policies and updating it when necessary.

8. Responsibilities of Implementation

The tasks and responsibilities are distributed among the relevant parties in Ooredoo Kuwait and its subsidiaries to ensure the effective implementation of the Environmental, Social, and Corporate Governance (ESG) Sustainability Policy, in accordance with their respective roles and mandates, as follows:

8.1 First: The Board of Directors

- Exercises overall supervision over the implementation of this Policy, provides the necessary guidance, and follows up accordingly, giving it priority on its meeting agendas.
- Approves key objectives and indicators and periodically reviews the progress achieved.

8.2 Second: The Nominations, Remuneration, and Sustainability Committee

- Monitors the implementation of this Policy and submits periodic reports to the Board of Directors on progress made toward achieving defined objectives.
- Coordinates with other committees and Senior Executive Management, if necessary.

8.3 Third: Senior Executive Management

- Implements sustainability and governance-related policies and procedures in daily operations.
- Submits periodic performance reports to the Nominations, Remuneration, and Sustainability Committee.

8.4 Fourth: Sustainability Team

The Sustainability Team shall undertake the following duties and responsibilities:

- Monitor compliance with the Sustainability Policy and prepare periodic reports in this regard which shall be submitted to the Nomination, Remuneration and Sustainability Committee and any other relevant committee.
- Collaborate with external auditors specialized in sustainability to conduct joint audits aimed at verifying the accuracy and validity of relevant data every three years
- Develop the company's sustainability strategy, reporting, annual sustainability performance.

8.5 Fifth: The Competent Administrative Unit

The Relevant Administrative Unit shall, as applicable, undertake the following responsibilities:

- Monitor the extent to which administrative units comply with the implementation of the Policy and provide recommendations to Senior Management.
- Contribute to developing internal control mechanisms related to sustainability and corporate governance.

9. Accountability and Responsibility Mechanisms

Ooredoo Kuwait is committed to accountability in implementing this policy. Any concerns or potential non-compliance will be addressed and escalated in accordance with Ooredoo Kuwait's applicable internal policies and procedures.

10. Adoption of Integrated Policies

The Relevant Administrative Unit in Ooredoo and its operating companies shall, in coordination with the Committee and upon approval by the Board, and within the scope of its responsibilities to ensure integration among environmental, social, and governance aspects, issue the following policies:

To ensure consistency across Ooredoo Kuwait and its subsidiaries, the Committee shall issue standardized policy templates and implementation guidance for adoption by all Operating Companies. The Audit Rotation Policy shall cover both financial auditors and sustainability assurance providers, with external assurance of ESG disclosures conducted at least once every two to three years in line with internationally recognized standards (e.g., IAASB ISSA 5000, IFRS S1/S2, and GRI 2-23/2-24).

- Anti-Bribery and Corruption Policy.
- Data Privacy Policy.
- Whistleblowing Policy.
- Advertising Ethics Policy.
- Human rights & Non-Discrimination Policy.
- Business continuity policy.
- Diversity & Inclusion Policy.
- Occupational Health and Safety Policy.
- Any other sustainability-related policy adopted by the Board.

The Committee shall adhere to the highest international standards and best practices to reinforce principles of transparency and corporate accountability, ensuring consistency with the provisions of this Policy and all relevant internal regulations and procedures.

The Board of Directors may amend or introduce additional policies as needed, based on a recommendation from the Committee.

11. Performance Indicators and Targets

Ooredoo and its operating companies shall commit to setting clear, defined, and measurable Key Performance Indicators (KPIs) in sustainability areas, including but not limited to:

- Annual reduction rate of carbon emissions.
- Percentage of reliance on renewable or environmentally friendly energy sources.
- Workforce diversity rates, and increased representation of diverse groups in leadership positions.
- Percentage of suppliers and contractors committed to environmental, social, and governance (ESG) standards.

The Relevant Administrative Unit, in coordination with departments responsible for managing and analyzing corporate data, shall prepare and approve the methodologies required for collecting and analyzing sustainability performance indicator data, ensuring accuracy and consistency with applicable national and international corporate disclosure standards.

12. Use of Digital Technologies in Sustainability

Ooredoo and its operating companies shall adopt the latest digital technologies, including artificial intelligence (AI) and big data analytics, for collecting and analyzing data related to performance indicators. This shall ensure the accuracy and reliability of sustainability performance reports and their alignment with international best practices.

13. Review and Update of Performance Indicators

The Executive Director Strategy & Corporate Affairs shall periodically review these indicators and update targets in alignment with legislative developments, international trends, and the United Nations Sustainable Development Goals (SDGs).

Such reviews shall be conducted at least once every two years, or whenever operational or regulatory needs require.

14. ESG Performance Monitoring

Ooredoo Kuwait shall establish and monitor relevant ESG performance indicators, periodically review its performance against them, and disclose sustainability performance in accordance with applicable reporting requirements.

15. Environmental, Social, and Governance Risk Management

Upon approval by the Committee, Risk Management shall establish a mechanism for identifying and evaluating sustainability risks that may impact Ooredoo's reputation, financial, and operational activities. This mechanism shall include analyzing risks related to climate change, supply chains, and relevant legal exposures.

16. Sustainability Opportunities

Ooredoo and its subsidiaries shall commit to identifying and leveraging sustainability-related opportunities, including but not limited to:

- Investing in environmental and social innovations.
- Adopting environmentally friendly solutions and technologies.
- Participating in local and international initiatives that promote sustainability.
- Submitting periodic reports on these opportunities and their utilization to the relevant Committee and the Board of Directors.

17. Periodic Review of Sustainability Risks

The Board of Directors or the relevant Committee shall conduct a periodic review of these risks at least once annually and provide the necessary guidance to Senior Executive Management.

18. Risk Management and Mitigation Plans

Executive Management shall commit to developing plans to mitigate or reduce the impact of risks and shall submit annual reports accordingly to the relevant Committee or the Board, as applicable.

These plans must include mechanisms for monitoring, follow-up, and clear allocation of executive responsibilities.

19. Penalties and Accountability

Any violation of this Policy shall be addressed in accordance with Ooredoo Kuwait's applicable internal policies and procedures and relevant legal requirements.

20.Compliance Procedures

Ooredoo and its operating companies shall ensure that all Environmental, Social, and Governance (ESG) sustainability policies comply with relevant international standards and applicable national regulatory requirements.

21. Integration of Compliance Requirements

Compliance requirements for ESG standards shall be integrated into operational activities and processes through clear protocols, approved governance structures, and comprehensive risk management systems. All administrative units are required to fully comply with the provisions of this policy and promptly report any deviations, risks, or violations upon detection.

In the event of any breach, non-compliance, or escalation, immediate notification must be provided to the Sustainability Team which in turn shall escalate the matter to the Nomination, Remuneration and Sustainability Committee (NRSC) to undertake necessary actions, including conducting investigations and determining appropriate corrective measures.

22. Scope of Sustainability Compliance

Compliance with the provisions of this policy shall include, but not be limited to, the following:

- Adherence and alignment with leading international sustainability frameworks and standards.
- Implementation of ethical governance practices, including anti-bribery and anti-corruption policies.
- Integration of sustainability risks into the Enterprise Risk Management (ERM) system.
- Adoption of clear and transparent grievance mechanisms in accordance with international standards.
- Provision of continuous training and awareness programs for all stakeholders regarding sustainability.
- Conducting periodic external audits and verification processes, as part of the Group audit process, to ensure the accuracy and integrity of relevant data and reports.
- Preparation of regular and transparent external reports on sustainability performance that meet stakeholder expectations and regulatory requirements.
- Immediate escalation of any significant sustainability violations to the Relevant Administrative Unit, Sustainability Team or the Nomination, Remuneration, and Sustainability Committee, as appropriate.
- Development and implementation of corrective action plans and timelines to address confirmed cases of non-compliance.

The Relevant Administrative Unit shall document all escalated, investigated, or resolved cases in accordance with internal compliance procedures adopted by Ooredoo and its operating companies. These documented outcomes shall be included in the annual sustainability compliance report.

23. Handling of non-compliance

Ooredoo Kuwait shall address instances of non-compliance with this Policy in accordance with its applicable internal policies and procedures

24. Review of Alleged Violations

Alleged violations of this Policy shall be reviewed and addressed in accordance with Ooredoo Kuwait's applicable internal policies and procedures.

25. Whistleblowing Mechanisms and Protection of Whistleblowers

Ooredoo and its Operational Companies commit to providing safe and confidential channels for reporting any violations or unethical behavior or breaches of this Policy. Refer to Ooredoo's Whistleblowing Policy for more details.

26. Whistleblower Protection and Investigation Procedures

A whistleblower shall be guaranteed protection from any retaliatory measures or penalties arising from making a report in good faith. The internal regulations relating to the Whistleblowing Policy shall determine the procedures for handling reports and conducting transparent and impartial investigations, while ensuring the confidentiality of the whistleblower's information and the reported issue.

27. Cooperation with Stakeholders

Ooredoo and its Operational Companies shall establish regular communication channels with various stakeholders (shareholders, customers, employees, suppliers, the local community, and regulatory bodies) to present progress in the areas of sustainability and governance and to receive feedback and suggestions.

Dialogue forums or periodic surveys may be conducted for this purpose.

28. Integration of Suppliers into Sustainability Practices

In implementing this Policy, Ooredoo and its operating companies shall commit to integrating suppliers and contractors into Environmental, Social, and Governance (ESG) sustainability practices. This shall be achieved by incorporating specific sustainability-related terms and criteria into all contracts concluded with them, including supply contracts, contracting agreements, and third-party integrity questionnaires, to ensure their compliance with relevant national legislation and internationally recognized best practices in this area.

A periodic compliance review mechanism may also be included within contractual terms.

29. Collaboration with Legislative and Regulatory Authorities

Ooredoo and its operating companies shall collaborate with relevant legislative and regulatory authorities to ensure alignment of sustainability plans with Kuwait's 2035 vision "New Kuwait" objectives and general strategies, without prejudice to the applicable laws and regulations in the countries where the operating company's function. This collaboration shall be documented in annual follow-up reports.

30.Training and Development

The Human Resources and Sustainability Team shall prepare a training plan upon needed, aimed at enhancing employees' knowledge of the theoretical and practical frameworks of sustainability and governance. This training plan shall include instruction on relevant international standards and associated digital tools.

31. Annual Training for Board Members

The Corporate Governance Department, in coordination with the Human Resources and Sustainability Team, shall organize a specialized training program as needed for Board members. This program aims to enhance their understanding of the best international practices in governance and sustainability, and to clarify how these practices relate to their oversight and strategic guidance roles within Ooredoo.

32.Evaluation of Training Programs

Ooredoo Kuwait shall periodically assess the effectiveness of its sustainability training and awareness initiatives and make improvements as appropriate.

33.Evaluation and Review

An annual review of the performance of Ooredoo and its Operational Companies in sustainability and governance areas shall be conducted, with a comprehensive report prepared detailing results, challenges, and proposed solutions.

This report shall be prepared by the Sustainability Team and go to approval by the Head of Sustainability Function and the RNSC.

34.Policy Review and Amendments

The Board of Directors shall review this Policy at least once every three years, or whenever necessary, based on the recommendations of the Nominations, Remuneration, Sustainability Committee and Any amendments to this policy require endorsement by the Audit and Risk Management Committee prior to obtaining final approval from the Board of Directors, in accordance with applicable laws and international best practices to ensure its alignment with legislative changes, operational needs of Ooredoo, or developments in international standards.

Proposed amendments shall be presented to the relevant Committee for review prior to approval. Amendments and their effective dates shall be documented in a special register maintained by the Corporate Governance Department.

35. Confidentiality of Information and Disclosure

Ooredoo and its Operational Companies shall safeguard the confidentiality of information related to the performance of this Policy, while publishing comprehensive and transparent reports clarifying the extent of compliance and its impact on society, the environment, and governance, in accordance with best practices and international disclosure standards.

36. Protection of Confidential Information

Ooredoo Kuwait shall protect confidential and sensitive ESG information and disclose it only in accordance with applicable laws and its internal policies and procedures.

37. Final Provisions

This Policy is an integral part of the Company's internal systems and regulations. All administrative units, employees, and stakeholders shall adhere to their provisions, and it shall be published on the official websites of Ooredoo and its Operational Companies.

The approved version of the Policy shall be made available in Arabic and English. In case of conflict, the Arabic version shall prevail.