



Ooredoo Group

**Corporate Social Responsibility (CSR) &
Donations
Policy Guidelines**

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1. Purpose

This document establishes the basic guidelines and lines of action regarding the OG OpCos Corporate Social Responsibility which allow the formalisation and implementation of the concept of CSR within the framework of the organisation, its communication thereof to stakeholders and the progressive systematisation in all systems and operational processes of Ooredoo Group. The purpose of this Policy Guidelines is to have a clear guideline on CSR requests, process, and execution and to ensure that OpCos CSR activities are in line with the OpCos CSR strategy and objectives. This policy further will support Ooredoo PALESTINE's commitment to improve the brand values and reputation by empowering and supporting Palestine (OPCO country)-community and people by collaborating with relevant national/local agencies, wherever possible. Please note that the guidelines provided in this document only apply to CSR activities.

2. Scope

The scope of this document is to guide various stakeholders both internal/external, on how we process and activate our CSR Policies, guide and understand the steps that are taken towards every corporate social responsibility activity including the evaluation criteria and the approval process:

INTERNAL: ***(Only when required and requested as a guideline on process)***

- Legal
- Audit
- Social Media Team (SMT)
- CSR Committee Members
- Strategy & Transformation
- Government Relations
- External Public Relations

EXTERNAL: ***(Only when required and requested)***

- NGOs,
- Government
- Associations
- Ooredoo Group
- Non-profit organizations.
- Community support groups,
- Students (who are required to benchmark best practices in CSR)

3. Basic Principles

1. The policy defined herein constitutes the minimum requirements to be met by all companies that operate under the umbrella of Ooredoo Group. The chief executive of each company of Ooredoo OpCo must ensure that internal regulations are developed and/or adapted in line with this policy and with any applicable local legal regulations.

2. The CSR Policy is applicable to all the organisation's activities and in all countries in which it operates both, directly and indirectly. It covers the entire life cycle of the Ooredoo Group's activity and complements the Group's companies' commitment to comply with the requirements of the legal framework in each country.
3. In accordance with the definition of CSR contained in the Corporate Social Responsibility Strategy, CSR is an organisation's responsibility for the impact of any nature of its activity on society and on its environment.
4. In line with these standards, in the specific management framework, Ooredoo OpCos to commits to comply with the requirements
5. Similarly, in the setting of accountability, the standards of the Global Reporting Initiative (GRI), along with the technical equivalences to specific standards, constitute the Ooredoo Group's frame of reference, without prejudice to the inclusion of other complementary standards which may enhance the analysis and may be relevant for attaining the commitments outlined in this policy.
6. In accordance with these standards, Ooredoo Group recognises two basic principles which apply transversally to all lines of action and commitments and upon which the implementation thereof is based:
 - **Human Rights:** The protection of and respect for universally recognised fundamental Human Rights, within the Ooredoo Group's sphere of influence, and non-complicity in the infringement thereof, as well as redressing the damages arising in the case of infringement.
 - **Stakeholders:** The identification of the organisation's stakeholders, taking into consideration the entire value chain of the activity, the development of communications and participation channels and their direct and indirect involvement in the identification of material aspects and the assessment of the performance.
7. This policy is developed and supplemented through the internal regulations on Corporate Governance.

4. Lines of action and commitments

The strategic areas to be contained in the CSR Master Plan, may be as the following:

- **Ethic Management and good corporate governance:** to develop a culture that promotes the best practices of Corporate Governance, marked by the principles of efficiency, responsibility and alignment with principles and values based on respect, freedom of opinion, the integration of diversity of gender and race.
- **Development of people:** to promote a quality employment; with a talent development plan to ensure competitiveness and sustainability of the Ooredoo Group OpCos, as well as the own employability of their professionals; with appropriate policies accompanying the internationalization process of the Ooredoo Group.
- **Sustainable Business Development:** to promote a management of the operations focused on the principles of efficiency valorising and maximising the use and utilization of all resources, with special attention to the non-renewable, and adopting the criteria of circular economy. Also, to promote, in cooperation with the industry and academic and scientific institutions, the analysis and monitoring of the environmental impact linked to the development of the activity of the Ooredoo Group.

- **Contribution of value to society:** this is expressed in the support of innovation and entrepreneurship projects in the telecommunications sector; approximation to the third sector and the Public Administrations to support projects and initiatives in the field of digital inclusion; impulse and encouragement to responsible and local purchasing as expression of the tractor role of the Ooredoo Group in relation to countries and territories in which it operates.
- **Communication and reporting** understood as a key factor in the creation of an environment of transparency in relation to the Ooredoo Group OpCos, as well as an approach, knowledge and acknowledgment in relation to the stakeholders of Ooredoo Group OpCos.
- **Governance of Corporate Responsibility:** to provide the elements and necessary resources, both of supervision and control as well as executives, to ensure the development and implementation of the CSR Master Plan and its update.

The monitoring of the implementation of actions linked to attaining the strategic objectives of the CSR Master Plan, along with the regular updating of material aspects and with the participation of stakeholders, will have an impact on the progress of the priority contents in each of the strategic areas.

The capacity to have an impact in the application of the policy, will vary on the basis of the existing management capacity, as well as on the stakeholders involved in each of the material aspects.

Moreover, each Business Unit and Functional Area, in coordination with the Department of Legal and Corporate Governance of Ooredoo Group OpCo, is responsible for implementing the corresponding actions for compliance with the commitments outlined in this policy, as well as any specific linked procedures and regulations.

5. Monitoring and control

- The CSR Committee is the highest governing body responsible for ensuring compliance with the commitments established in this policy, as well as the actions which may derive from it. Similarly, such Committee is responsible for approving and monitoring the organisation's material aspects in the area of CSR, as well as for monitoring the application of the CSR Master Plan of the OpCo.
- Likewise, all areas and departments in Ooredoo Group OpCos should participate directly and indirectly in the implementation of specific actions and the monitoring thereof, in accordance with the corresponding sphere of competence and the relationship thereof with the material aspects of the CSR.
- Annually, the entire organisation will be involved in process of collecting data and evidence of progress in the field of CSR, which are reflected in the Integrated Annual Report in which the results of the performance analysis are collected for each of the economic, environmental, social and good governance aspects.

- The annual Corporate Social Responsibility Report to be prepared by the Head of CSR and approved by the Committee on a Quarterly and Annual basis and submitted to relevant authority as per local business or regulatory requirement and the OPCO board.
- Report shall include all CSR activities for the year in question, and the amounts expended in relation to each activity.
- A separate cost center or line item in Cognos shall be established to track all CSR activities.
- The Integrated Annual Report is of a public nature, is prepared in accordance with the main international standards in the field.

6. Structure & Charter of CSR Committee

6.1 Formation of the CSR Committee:

- CSR Committee to be established under OpCo board approval.

6.2 CSR Committee members & organization:

1	CEO	Chairman
2	Finance director	Deputy Chairman
3	Chief Commercial Officer	Member
4	Head of Human Resources	Permanent Member
5	General Counsel	Permanent Member

- A CSR secretary will be appointed by the Chairman who will coordinate and conduct the CSR meetings.
- The organization structure to be approved by the OpCo board.
- The quorum shall not be less than four, one of whom must be the Chairman or Deputy Chairman.

Terms of Reference and Authorities

- The financial authority limits as set out in the Company's Authority Manual shall apply with respect to the ability of individual members to commit the Company to any CSR arrangement, and should follow the approved DRM in each OpCo.

Meetings and Procedures

- The Committee shall meet as required depending on the urgency and volume of proposals, assuming there are CSR proposals received during the preceding period.
- Meetings may be called by either the Chairperson or the Secretary of the Committee. The meeting shall not be valid unless it is attended by at least four (4) members, one of which shall include the Chairperson or his/her delegate.

- The Committee may invite any staff to attend its meetings, provided that such persons have no voting rights at the meeting.
- Decisions of the Committee shall be approved by a majority of the members present. Where there is a tied vote, the Chairperson shall have the casting vote.
- Within one week of the Committee's meeting date, the Secretary shall prepare the draft minutes of meeting and send it to its members for their comments and approval. The approved minutes shall be signed by the Chairperson and the Secretary.
- The Secretary shall keep the record of the Committee's original minutes, decisions and documents.

7. Policy and Process Details:

7. CSR proposal requests, received from external entity - All proposals should be assessed to see if they fit CSR strategy, CSR strategy should be complimented with Country's (Year) vision in mind and the organizations strategy aligned within.
7. A formalized grid evaluation is then submitted along with the proposal to the Committee for approval or otherwise. Committee decisions (approvals and rejections) are noted and then communicated to the relevant requestor in writing within 5 (five) working days of the decision being taken
7. Any New Short Code Activation approvals by MTIT or regulators (wherever applicable) – The internal proposal and process should be initiated after receiving approval from the relevant authorities. Please refer process template from Palestine OpCo as reference
7. Payouts – All payouts by the OpCos should be done as per the existing approved OpCo process..

8. Distribution

8.1 The Policy should be kept in safe custody and must not be copied or revealed to unauthorized third parties without the express written permission of the OpCo Management Committee. Distribution of this Policy outside the OpCo by users of the Policy is strictly prohibited. The Corporate Social Responsibility (CSR) Policy Guidelines is a controlled document of which only 3 controlled copies are kept:

- Copy 1 of 3: Master Copies – Marketing, CSR Department, Strategy & Transformation
- Copy 2 of 3: CEO Office
- Copy and 3 of 3: Posted on Ooredoo intranet by BPO.

8.2 OpCo Commercial is responsible, as the designated custodian, for the maintenance of this Policy, and the sharing of the document with the relevant OpCo's employees. This policy is applicable for all OPCO employees. Unawareness of this Policy does not excuse a person from the obligation to comply with it.

8.3 There should be a review conducted every 2 years for the Policy to see if any revision is needed in response to the changing needs and requirements of the company. It will be the responsibility of each concerned authority in the Policy to ensure that it uses the updated version of the Policy.

9. Definitions

In the application of this policy, the following words and expressions have the meanings hereby assigned to them, unless the context otherwise requires.

TERMS	Definitions
Company or OpCo	Ooredoo PALESTINE
CSR	Corporate initiatives with the purpose of creating a positive impact on society and mitigating any adverse impact of the Company on the national economy, community or environment at large.
CSR Committee	Means members who make the decision towards CSR requests by discussing and voting to endorse (A minimum of three endorsements is required to process or support a request). <i>(Please refer to committee member chart 1 for reference)</i>
CXO	Relevant Chief Officer
Donations	Refers to one-off or occasional support to good causes in response to the needs and appeals of charitable and community organisations, or in reaction to external events such as emergency relief situations. Examples of donations include: <ul style="list-style-type: none"> • Donations of cash, products, services or equipment to local, national and international charitable appeals • Social ‘sponsorship’ of causes or arts / cultural events with name recognition for the company that is not part of a marketing strategy • Grants from corporate foundations that are not linked to a core community strategy • Costs of facilitating donations by customers and suppliers • Gifts of products and services from inventory at cost • Occasional use of company premises and other resources
MOXX	Ministry of XX – Relevant Ministry in the country for CSR
OMC	Means the senior executive team of the Company comprising the CEO, CFO, CRO, CCO, CBWO, CTIO, CLRCGO, CNBO and CPO
PR	Public Relations
Third Party	A company or legal entity other than Ooredoo PALESTINE

TRA	Telecommunication Regulatory Authority	
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9. Policy Amendment

All amendments, additions or deletions to this Policy are properly documented and authorized / recommended by the OpCo Management Committee, preliminary approval by OpCo Audit & Risk Committee and finally approved by the Board/BOC prior to implementation.

10. Exception

In the event of any conflict in the interpretation of the rules of this Policy, the interpretation as given by the OpCo Management Committee will prevail.