

OOREDOO PALESTINE

Sustainability Policy

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Article (1) Definitions and General Provisions

For the purposes of 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** : Ooredoo Palestine
- The Group** : Ooredoo Group (L.L.C.), a limited liability company registered at the Qatar Financial Centre under No. (00060), wholly owned by Ooredoo.
- The Board** : The Board of Directors of Ooredoo Palestine.
- The Committee** : The Executive 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 Social Responsibility International Sustainability Disclosure Standards** : Processes and policies aimed at minimizing negative environmental impacts.
: Actions and initiatives that enhance societal well-being and support sustainable development.
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 Palestine 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 Officer** : Oversee the implementation of the company's sustainability agenda and ensuring alignment with approved policies and strategic objectives

Article (2)

General Objectives of the Policy

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

1. Reduce the environmental impact of the Ooredoo Palestine 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 the Ooredoo Palestine.
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).

Article (3)

Policy Pillars

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

First: Environmental Sustainability

Ooredoo Palestine commit to reducing the environmental impact of their operations through the following:

1. Increasing the use of renewable energy and reducing reliance on fossil fuels.
2. Setting targets to reduce carbon emissions and improve energy efficiency.
3. Adopting measures to conserve water and electricity and minimize waste.
4. Enhancing Ooredoo Palestine's capacity to adapt to risks associated with climate change.
5. 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.

Second: Social Responsibility

Ooredoo Palestine commit to strengthening their obligations toward society through the following:

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

Third: Governance

Ooredoo Palestine commit to applying the highest standards of governance, as follows:

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

Article (4) Ooredoo Palestine Commitments

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

1. Preparing annual reports on Ooredoo Palestine'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.
2. Reviewing and updating this Policy periodically, in alignment with legislative changes and best practices.
3. Providing awareness programs for all employees on the importance of sustainability and governance practices and their impact on Ooredoo Palestine and the community.
4. Cooperating and coordinating with regulatory authorities to ensure that this Policy aligns with national and international standards.
5. Ensuring consistency between this policy and other relevant internal policies and updating it when necessary.

Article (5)

Responsibilities of Implementation

The tasks and responsibilities are distributed among the relevant parties in Ooredoo 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:

First: The Board of Directors

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

Second: The Executive Committee

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

Third: Senior Executive Management

1. Implements sustainability and governance-related policies and procedures in daily operations.
2. Submits periodic performance reports to the Executive Committee.

Fourth: Sustainability Department:

The Sustainability Department shall undertake the following duties and responsibilities:

1. 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.
2. Collaborate with external auditors specialized in sustainability to conduct joint audits aimed at verifying the accuracy and validity of relevant data every three years
3. Develop the company's sustainability strategy, reporting, annual sustainability performance.

Fifth: The Competent Administrative Unit

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

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

Article (6) Accountability and Responsibility Mechanisms

In the event of negligence or failure by any administrative unit or employee in implementing the provisions of this Policy, the following measures shall be undertaken:

1. An administrative investigation shall be conducted by the Sustainability Officer in coordination with the relevant administrative unit in line with company policies.
2. Submission of investigation results to the Executive Committee.

3. Application of administrative sanctions in accordance with the internal regulations adopted by the Group and operating companies.

Article (7) **Adoption of Integrated Policies**

The Relevant Administrative Unit in Ooredoo Palestine 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 the Group, 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).

1. Anti-Bribery and Corruption Policy.
2. Data Privacy and Security Policy.
3. Conflict Minerals Policy.
4. Audit Rotation Policy.
5. Human Rights Policy.
6. Whistleblowing Policy.
7. Environmental Policy.
8. Supplier Code of Conduct.
9. Advertising Ethics Policy.
10. Child Rights Protection Policy.
11. 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.

Article (8) Performance Indicators and Targets

Ooredoo 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.

Article (9) Use of Digital Technologies in Sustainability

Ooredoo 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.

Article (10)

Review and Update of Performance Indicators

The Sustainability officer and finance Department and with OG Sustainability team 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.

Article (11)

Measurement Methodologies and Performance Review

The Relevant Administrative Unit shall develop and implement clear methodologies for measuring sustainability-related Key Performance Indicators (KPIs) through:

1. Clearly defining criteria for the success and failure of each indicator.
2. Describing mechanisms for periodic measurement, data collection, and review.
3. Regularly documenting the results in periodic reports submitted to the relevant Committee for review and necessary decision-making.

Article (12)

Environmental, Social, and Governance Risk Management

Upon approval by the Committee, Ooredoo's 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.

Article (13)

Sustainability Opportunities

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

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

Article (14)

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.

Article (15)

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.

Article (16)

Penalties and Accountability

In the event of proven significant violations of the provisions of this Policy or any relevant sustainability and governance regulations, Ooredoo

Palestine , shall take appropriate legal or disciplinary actions against violators.

A recommendation in this regard shall be submitted to the Board of Directors based on the results of investigations conducted by the relevant unit in coordination with the Committee.

Article (17) Compliance Procedures

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

Article (18) 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 Officer within the Ooredoo Palestine, which in turn shall escalate the matter to the Executive Committee (EC) to undertake necessary actions, including conducting investigations and determining appropriate corrective measures.

Article (19) Scope of Sustainability Compliance

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

1. Adherence and alignment with leading international sustainability frameworks and standards.
2. Implementation of ethical governance practices, including anti-bribery and anti-corruption policies.
3. Integration of sustainability risks into the Enterprise Risk Management (ERM) system.
4. Adoption of clear and transparent grievance mechanisms in accordance with international standards.
5. Provision of continuous training and awareness programs for all stakeholders regarding sustainability.
6. Conducting periodic external audits and verification processes to ensure the accuracy and integrity of relevant data and reports.
7. Preparation of regular and transparent external reports on sustainability performance that meet stakeholder expectations and regulatory requirements.
8. Immediate escalation of any significant sustainability violations to the Relevant Administrative Unit within the Group or the Nomination, Remuneration, and Sustainability Committee, as appropriate.
9. 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. These documented outcomes shall be included in the annual sustainability compliance report.

Article (20)

Procedures for Handling Non-compliance Cases

In the event of any proven case of non-compliance with the provisions of this Policy, the Relevant Administrative Unit shall undertake the following:

1. Immediately notify the Sustainability Department to take the necessary actions.
2. Develop a clear corrective action plan, including specific procedures and a timeline for implementation.
3. Document the non-compliance incident and actions taken, and submit a detailed report to the Executive Committee.

Article (21)

Investigation Procedures for Violations

Ooredoo Palestine Governance Department shall coordinate with the administrative unit responsible for legal affairs to conduct impartial investigations into any allegations of violations. The Department shall submit its recommendations to the Executive Committee for appropriate decision-making.

Final reports must include a description of the incident, an analysis of its causes, and proposed recommendations to prevent its recurrence.

Article (22)

Whistleblowing Mechanisms and Protection of Whistleblowers

Ooredoo commit to providing safe and confidential channels for reporting any violations or unethical behavior or breaches of this Policy. Kindy refer to Ooredoo Palestine Whistleblowing Policy for more details.

Article (23)

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.

Article (24)

Cooperation with Stakeholders

Ooredoo Palestine 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.

Article (25)

Integration of Suppliers into Sustainability Practices

In implementing this Policy, Ooredoo 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.

Article (26)

Collaboration with Legislative and Regulatory Authorities

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

Article (27)

Training and Development

The Sustainability Officer shall prepare an annual training plan 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.

Article (28)

Annual Training for Board Members

The Group Corporate Governance Department, in coordination with the Human Resources and Sustainability Department, shall organize an annual specialized training program 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 the Group.

Article (29)

Evaluation of Training Programs

The impact of the training programs shall be evaluated annually, and results shall be submitted to the Executive Committee to make any necessary improvements.

Article (30)

Evaluation and Review

An annual review of the performance of Ooredoo 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 officer and go to approval by the OG sustainability team and Executive Committee.

Article (31)

Policy Review and Amendments

The Board of Directors shall review this Policy at least once every three years, or whenever necessary, to ensure its alignment with legislative changes, operational needs of the Group, or developments in international standards.

Proposed amendments shall be presented to the relevant Committee for review prior to approval.

Article (32)

Confidentiality of Information and Disclosure

Ooredoo 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.

Article (33)

Controls for Disclosure of Confidential Information

No member of the Board of Directors, Senior Executive Management, or any employee of the Company may disclose any confidential information pertaining to environmental, social, and corporate governance practices, except in accordance with the approved procedures of this Policy or as required by law.

Article (34)

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 its provisions, and it shall be published on the official websites of Ooredoo, the Group, and the Operational Companies.

The approved version of the Policy shall be made available in Arabic and English.

Article (35)

Policy Amendments and Documentation of Changes

The Board of Directors may amend this Policy whenever necessary, based on the recommendations of the Executive y Committee, in accordance with applicable laws and international best practices.

Amendments and their effective dates shall be documented in a special register maintained by the Group Corporate Governance Department.