

## Anti-retaliation Policy

### Purpose

Ooredoo Group's Anti-retaliation Policy describes our provisions towards employees who file reports for harmful, discriminatory, or unethical behaviors. Whether accusations are true or false, our company wants to prevent victimization and other retaliatory behavior towards the employee.

We believe it's important that employees aren't afraid to speak up about any issues. It's to our company's benefit to resolve them as soon as possible. An environment of fear can only be harmful in the long run.

We will follow all legal prohibitions for retaliation and will grant employees the right to speak about misconduct. At any case, we will make an effort to preserve legality and business ethics.

### Scope

This Policy applies to all prospective, current or former employees of the company.

### Objectives

The primary objectives of the Anti-Retaliation HR Policy are to foster a safe and supportive work environment where employees feel empowered to report concerns without fear of negative consequences. This Policy aims to uphold the integrity of our organization by ensuring that all reports, whether substantiated or not, are taken seriously and addressed appropriately.

Additionally, the Policy seeks to mitigate legal risks associated with retaliatory actions by promoting transparency and accountability. By clearly defining retaliatory behaviors and their consequences, we aim to deter such actions and encourage a culture of open communication and trust. Ultimately, the Policy is designed to protect employees, enhance workplace morale, and uphold the company's commitment to ethical practices.

### Guidelines

Actions that often bring about retaliation include but are not limited to:

- Complaints for workplace harassment or discrimination
- Complaints about company actions that harm the environment or society
- Requests for parental or other leave
- Participation in a pending investigation of misconduct or violations
- Lawsuits for wrongful dismissal or termination for cause

Employees may file complaints internally to a manager or Human Resources Department. Or they may speak to persons able to take legal action against the alleged guilty party.

In any case, Ooredoo Group will follow our harassment-free workplace principles. Employees who report misconduct or suspected violations must be protected from retaliation. Ooredoo Group does not want to silence complaints, but encourage open communication in accordance with the Ooredoo Group open-door policy.

In line with Ooredoo Group's commitment to Environmental, Social, and Governance (ESG) principles, this Policy also applies to employees who report violations related to environmental sustainability, social responsibility, or corporate governance practices. Employees are encouraged to report any actions that compromise Ooredoo's sustainability goals or ethical business practices, and such reports will be handled with the same level of protection from retaliation.

### Actions

Employees have the right to communicate problems, suggestions or issues to any manager. Anti-retaliation Policy applies to all official or unofficial reports. All complaints will be kept confidential, and investigation will be as little disruptive as possible.

In cases of lawsuits or complaints filed by an authority or legal entity, employees won't be victims of retaliation.

If an employee files a complaint with Ooredoo Group against another employee, it will be taken seriously and investigated thoroughly. If there is a need to act immediately during the investigation (like in cases of harassment), Ooredoo Group will ensure the employee who filed the complaint will not be affected in any way. The alleged wrongdoer may see their employment or position affected until the investigation is concluded. This may include suspension from work with pay for the entire duration of the investigation.

In some cases, an employee who has filed a report may face disciplinary action on an unrelated offence. Ooredoo Group will provide official documentation stating the reason for disciplinary procedures against the employee, along with evidence of their misconduct.

For more details, please refer to the Disciplinary Section.

### Investigation Process for Anti-Retaliation Claims

To ensure a fair and unbiased approach to addressing retaliation claims, Ooredoo Group follows a clear and transparent investigation process.

The goal is to reassure employees that their concerns will be handled impartially and to protect the company from claims of bias.

The steps involved in the investigation process are as follows:

- **Step 1: Acknowledgment of Complaint:** The complainant makes a formal report to the HR department ideally in written form, signed and dated to his or her immediate supervisor, or if

preferred, any member of management. When a report of retaliation is received, the company will acknowledge receipt of the complaint, within five (5) working days.

- **Step 2: Preliminary Review:** A preliminary review is conducted to determine whether the reported issue falls within the scope of this Anti-Retaliation Policy. This step ensures the complaint is legitimate and requires further investigation.
- **Step 3: Investigation:** If the complaint is confirmed, an impartial and thorough investigation will be launched. This may involve interviewing the complainant, the alleged retaliator and any witnesses, to gather relevant information and context. Confidentiality will be maintained throughout the process.
- **Step 4: Analysis of Findings:** After the investigation, HR or the designated team will analyze the findings and assess whether retaliation occurred. The investigation will also review whether there were any attempts to influence or intimidate the employee who filed the complaint.
- **Step 5: Resolution and Action:** Based on the findings, the company will take appropriate action to resolve the issue, which may include disciplinary measures, counselling or other corrective steps. If retaliation is confirmed, corrective actions will be implemented immediately to prevent further harm.
- **Step 6: Communication with the Complainant:** The complainant will be informed of the resolution and any actions taken, ensuring transparency and closure of the process. If necessary, the complainant will be advised on their rights and the next steps, including any options for escalating the matter externally.

This process aims to ensure fairness, transparency and protection for employees who raise concerns, thereby fostering an environment of trust and open communication at Ooredoo Group.