**Zain’s response to allegations of complicity in unlawful surveillance in South Sudan**

*Business and Human Rights Resource Centre invited Zain to respond to allegations of complicity in surveillance on human rights defenders in South Sudan contained in the following Amnesty International report:*

* *""These walls have ears": The chilling effect of surveillance in South Sudan", Amnesty International, February 2020*[*https://www.amnesty.org/en/documents/afr65/3577/2021/en/*](https://www.amnesty.org/en/documents/afr65/3577/2021/en/)

*Zain provided the following response*

For Zain, respecting and adhering to human rights principles is at the core of doing business. The company is committed to actively encouraging the advocacy and adherence to human rights which is articulated in Zain’s Code of Conduct, Supplier Code of Conduct and Human Rights Policy Statement, which are all publicly available. Zain’s Human Rights Policy Statement was launched in 2020 and was disseminated through a message from the Vice Chairman and Group CEO to all employees across the company’s footprint which includes Zain’s operation in South Sudan. Zain has also been consistently reporting how it addresses its most salient human rights issues by conducting a comprehensive stakeholder engagement process and disclosing its impacts on its policies and practices in its annual Sustainability Report which is externally assured. This is based and is done in correspondence to the UNGP on Business and Human Rights Reporting. Customers’ Right to Privacy is identified as a salient human right issue for Zain where the company adheres to the GSMA Mobile Privacy Principles and is committed to protecting the personal information of its customer. Zain complies with all laws, regulations and international best practices related to the protection of customer privacy and data and takes the appropriate steps to align with ISO certifications related to the matter. As such, the company applies all stringent measures to avoid data leaks, theft, improper dissemination of data and/or loss. The protection of customer privacy is paramount for Zain, and as such, all necessary prudent measures are developed on a constant basis to protect the customers’ data at all times. Therefore, the company confirms that it has never engaged in activities that are related to installing equipment that enable unlawful surveillance activities.   Zain will also be looking further into this matter to ensure it mitigates any risks of inadvertent human rights violations and reaffirms its commitment to ensuring the rights of its customers are consistently protected.

The links below include all the policies mentioned in the above statement in addition to Zain’s Annual Sustainability Report:

[https://zain.com/en/about-us/corporate-governance/code-conduct-ethics/](https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fzain.com%2Fen%2Fabout-us%2Fcorporate-governance%2Fcode-conduct-ethics%2F&data=04%7C01%7CJennifer.Suleiman%40zain.com%7Cbc9f67682f484c260b3008d8d1708a18%7C7a3de2c5822c4c92877fdbab7df0f3ea%7C0%7C0%7C637489628577268690%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=c8E8ZnQKi8XBmGchSRxxmWrk%2FhaKPQq5Y36Z1cMbii0%3D&reserved=0)

[https://zain.com/en/sustainability/sustainability-report/](https://eur02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fzain.com%2Fen%2Fsustainability%2Fsustainability-report%2F&data=04%7C01%7CJennifer.Suleiman%40zain.com%7Cbc9f67682f484c260b3008d8d1708a18%7C7a3de2c5822c4c92877fdbab7df0f3ea%7C0%7C0%7C637489628577268690%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=DhWgfo7xvUz%2BWGF%2FkEfX16t%2FpF%2FKqzhhXUJeBY5q9SU%3D&reserved=0)”

If you need further clarification, please feel free to contact us.

Regards,

**Jennifer Suleiman**

Chief Sustainability Officer