



# **WHISTLEBLOWER POLICY**

**Burjeel Holdings PLC**



## 1. INTRODUCTION

Burjeel Holdings PLC including its affiliates and subsidiaries ( “Burjeel”) strives to conduct all business activities responsibly, efficiently, transparently, and with integrity towards all stakeholders. Burjeel’s values are incorporated into its Code of Conduct and Policies, which underline our commitment to safeguarding our principles.

## 2. PURPOSE

The purpose of this whistleblower policy (the “Policy”) is to set out the methodology to internally report any unethical or even suspected criminal behavior. At Burjeel, internal reporting of an issue is encouraged in order to maintain an open and positive line of communication.

Employees on all levels are encouraged to report, in good faith, any suspected misbehavior or malpractice to Burjeel’s Compliance Officer or to their immediate or next-higher manager.

This Policy provides a means for every reporting Employee to anonymously report a concern.

All reports are treated with the utmost confidentiality and are promptly investigated without the risk of recourse for the Reporting Employee so long as their report is made in good faith.

## 3. SCOPE

This Policy applies to all Burjeel employees, officers contract staff, and directors, permitted assigns, and other third parties authorised to represent Burjeel (collectively referred to as the “Employees”).

Concerns for which specific procedures have been established or personal grievances of Employees are excluded from the scope of this Policy.

## 4. REPORTABLE OFFENCES

Any actual or suspected irregularity, malpractice, breach or misconduct of a general, environmental, operational or financial nature within Burjeel based on reasonable grounds, including concerns that may be viewed as a breach of our Code of Conduct, internal policies and procedures and/ or local laws, rules and regulations is a reportable incident.

A reportable incident includes, but is not limited to:

- Accounting, internal accounting controls or auditing matters;
- Manipulation, concealment or abuse of confidential information;



- Bribery or corruption;
- Deceit;
- Environmental damage;
- Fraud or theft;
- Health hazards;
- Insider trading;
- Market abuse;
- Money laundering;
- (IT) Security;
- Competition and Anti-trust;
- Export Control and Sanctions laws and regulations
- Conflict of interest;
- Discrimination; and
- Sexual harassment.

## **5. HOW TO REPORT A CONCERN**

A reporting Employee may report a concern in the following ways:

- I. Reporting to their immediate or the next higher-level manager promptly upon uncovering the concern.
  - 1.1 The manager receiving the concern from the reporting Employee (the “Recipient Manager”) must record the concern in writing including the date of the report;
  - 1.2 The reporting Employee must review and sign the report, and must be given a copy of the signed report immediately;
  - 1.3 The Recipient Manager must deliver the signed report to the Compliance Officer;
  - 1.4 The reporting Employee must receive acknowledgement of receipt of the report from the Compliance Officer.
  
- II. If the reporting Employee is uncomfortable or unable to report to his or her immediate or the next higher-level manager, the reporting Employee may directly report to the Compliance Officer. E-mails to the Compliance Officer are received and maintained. Individuals may request to have their reports handled on an anonymous basis.

Upon receipt of the report, the Compliance Officer must, to the extent possible, provide the reporting Employee with acknowledgement of receipt of the report.

- III. If the reporting Employee is uncomfortable or unable to report to the Compliance Officer, he may directly report to the independent outside Hotline. The outside Hotline can be reached via



burjeelcompliance@inp.legal. E-mails are received and maintained by a third party engaged by Burjeel. Individuals may request to have their reports handled on an anonymous basis.

- IV. If the reporting Employee fears (i) retaliation, (ii) senior management at business unit level or the Compliance Officer is involved in the concern, or (iii) there are other reasons for which the reporting Employee feels unable or uncomfortable to report to the Compliance Officer, the Reporting Employee may contact the outside Hotline directly.

## **6. INVESTIGATION PROCEDURE**

If the Compliance Officer deems a concern legitimate and within the scope of this Policy, a preliminary investigation will be conducted, after which a full investigation may be launched if reasonable cause is found.

If requested, the reporting Employee may receive general information on the progress and closing of the investigation and its outcome, unless giving such feedback would be detrimental to the investigation. The Reporting Employee will be informed in a timely manner if no reasonable cause is found to pursue the concern and conduct further investigation.

## **7. NO RETALIATION**

Burjeel will make every effort to protect the reporting Employee against retaliation and to keep his/her identity confidential. Burjeel prohibits retaliation against any individual, based on a reasonable belief that an incident has occurred is ongoing or is likely to occur, makes a report or provides information either internally in accordance with the Policy or externally to any regulatory, governmental, law enforcement or self-regulatory agency.

Employees who believe they have been subject to retaliation for reporting an incident should immediately contact their HR manager or the Compliance Officer. Employees found to have engaged in retaliation may be subject to disciplinary action up to and including termination of employment or contract for services.

Only individuals whose involvement is necessary for the handling or investigation of the concern (“Authorized Persons”) will have knowledge of the identity of the reporting Employee.

## **8. ANONYMOUS REPORTING**

Burjeel encourages reporting Employees to provide their identity to the Compliance Officer as a means to facilitate the investigation. All reports are treated with the utmost confidentiality and the reporting Employee’s name will only be disclosed to Authorized Persons.

If a reporting Employee chooses to report anonymously, his or her identity will not be requested, and the



reported incident will be investigated as appropriately as possible using the information provided.

## **9. CONFIDENTIALITY OF REPORTS**

Reports of incidents will be treated in a confidential manner, to the extent appropriate. Burjeel may, if appropriate, disclose incident reports and any facts relating thereto to third parties, including regulatory, governmental, law enforcement or self-regulatory agencies. Individuals are required to maintain confidentiality regarding any report, finding and investigation.

## **10. FALSE ALLEGATIONS**

Burjeel does not tolerate false accusations. False accusations can have a significant effect on individual reputations and on Burjeel’s reputation. Accusations with the intent to damage another Employee or Burjeel, whether or not the reporting Employee may personally benefit from reporting a false accusation or making a false report, will not be tolerated. Burjeel Employees may only report bona fide concerns. Employees found to be deliberately falsifying reports or acting in a manner that is not consistent with Burjeel’s Code of Conduct will be subject to the disciplinary action as deemed appropriate.

## **11. AUDIT COMMITTEE REPORTING**

The Audit Committee shall be notified of incident reports. The Audit Committee shall address all such reports concerning incidents and issues needing immediate attention.

## **12. RECORD RETENTION**

All documents relating to incident reports must be retained in accordance with applicable laws and regulations. If information may be relevant to any pending or potential litigation, inquiry or investigation, the information must not be destroyed and must be retained for the duration of that litigation, inquiry or investigation and thereafter as necessary in accordance with applicable laws, regulations and internal policies and procedures.

## **13. POLICY APPROVAL**

This Policy shall be reviewed and approved by Burjeel’s Board. This Policy shall be effective from the date of approval by the Board. All amendments to this Policy will be done in compliance with applicable laws and will require approval by the Board. The Compliance Officer is the custodian of this Policy.

## **14. DOCUMENTATION AND REGULAR REVIEW**

Organization Scope	Burjeel
Parent Process	Compliance Program
Document owner	Compliance Officer



Approved by	Burjeel Board of Directors
Initial date published	February 10, 2023
Document effective date	February 10, 2023
Document updated as per	-
Contact person	Compliance Officer
Version	1.0

Burjeel’s Compliance Officer shall periodically evaluate the effectiveness of this Policy, and review and revise it as necessary, including to reflect any changes required by applicable laws. You can direct any suggestions for improvements to this Policy to Burjeel’s Compliance Officer at [cs@burjeelholdings.com](mailto:cs@burjeelholdings.com).