



الإمارات
Emarat

Emirates General Petroleum Corporation

Whistleblowing Policy

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Approvers

Name	Role
Risk & Audit Committee	Reviewer
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Glossary and abbreviations

Term	Definition
Anonymous	Having an unknown or unacknowledged name.
Complaint	A formal claim against someone.
Emarat	Emirates General Petroleum Corporation, as established under Federal Law No. 16 of 1980
Employee(s)	Employees of Emarat (full time, part-time or outsourced), interns, or training program members, regardless of their designation
EmTrust	Emarat whistleblowing line
External Stakeholder(s)	Customers or vendors or contractors or consultants, or any other parties with whom Emarat has a business or contractual relationship
FI Lead	Lead for the fraud investigation team
FI team	Fraud Investigation team, reporting to the Chief Internal Auditor. Responsible for conducting fraud investigations.
FM team	Fraud Management team, a subset of the Risk Management team. Responsible for fraud risk management.
Fraud	An activity involving direct and/or indirect deception by a person for monetary gain or causing a loss in any form to the company or any other party.
RAC	Risk & Audit Committee
Whistleblower	A person, of any level within the organization, who raises a genuine concern in good faith, and reports information of suspected wrongdoing or dangers at work.
Wrongdoing	Any actual, suspected, or undetected (past, present, or future planned) wrongdoing, dishonesty and/or fraudulent matter

1. Introduction and objective

Emirates General Petroleum Corporation's ("Emarat") Whistleblowing Policy aims to reinforce the organisation's commitment to applicable laws, to its policies, values, attitudes, and behaviours.

The main objective of the Whistleblowing Policy is to give guidance on how to disclose any actual, suspected, or undetected (past, present, or future planned) wrongdoing, dishonesty and/or fraudulent matters on a timely basis (hereafter, collectively referred to as "Wrongdoing"). The Policy seeks to create safe reporting channels, where Employees and External Stakeholders can voluntarily disclose and provide information to the concerned team (Fraud Investigations ("FI") team) in regard to Wrongdoing(s).

The policy also provides an alternative channel to other existing reporting mechanisms, to help the organization learn of potentially serious problems so that they can be resolved quickly.

2. What is Whistleblowing?

Whistleblowing refers to the act by a person or a group of disclosing, based on first-hand knowledge, sufficient and credible information to support enforcement of Emarat's Anti-fraud policy with respect to any Wrongdoing. For purposes of this policy, Wrongdoing encompasses various actions including but not limited to, the below:

- Illegal acts including criminal activities;
- Deliberate breach of regulations, internal policies, and procedures;
- Fraud, misuse, and abuse of company property;
- Corruption, bribery, money laundering, and/or terrorist financing;
- Questionable accounting and audit practices;
- Cover-up or attempted cover-up of any of the above; and/or
- Financial and procedural malpractice, including those relating to mismanagement, misappropriation of funds, actual or suspected fraud or abuse of authority.

Note:

The Whistleblowing Policy handles all fraud-related incidents. However, non-fraud related incidents/issues/grievance as described below will be handled as follows:

- The Customer Complaints function at Emarat shall handle all customer experience-related complaints. Please refer to the Emarat website to share the concerns related to customer experience.
- All non-fraud-related complaints, including, but not limited to, harassment, bullying, as well as health, safety, and environment violations will be handled by the Violations Committee and Grievance Committee. Please refer to the Emarat Human Resources Policies for further information.

3. Scope

This Whistleblowing Policy applies to all protected complaints made in good faith based on reasonable grounds that discloses, or demonstrates an intention to disclose, information that may evidence a Wrongdoing.

4. Acting in good faith

Users of the Emarat ethics line, (hereafter referred to as “EmTrust”) must act in good faith and must not make false complaints when reporting any concerns. Good faith is when a complaint is made without malice or consideration of personal benefit and the Whistleblower has a reasonable basis to believe the report to be true.

Emarat Employees and External Stakeholders are expected to refrain from rumours, irresponsible behaviour, and false complaints. If an Employee or an External Stakeholder makes a complaint in good faith, but it is not confirmed through the investigation, no action will be taken against them. However, if an Employee or External Stakeholder makes hateful or troublesome complaints (i.e., not in good faith), disciplinary action will be taken against them in accordance with the Emarat policies and applicable laws.

5. Confidentiality and non-retaliation

5.1. The confidentiality of the complaints will be maintained, consistent with the need to conduct an adequate internal investigation.

5.2. The identity of the Whistleblowers will be kept confidential. However, any information about the Whistleblower that is not legally required to be kept confidential, may be disclosed only where such a complaint is:

- Required under applicable laws or requested by competent courts or governmental bodies.
- Made after obtaining the Whistleblower’s consent if identity is essential to conducting a thorough investigation & proving the Wrongdoing.

5.3. Harassment or Victimization:

Emarat recognizes that the decision to disclose a Wrongdoing can be difficult, especially in fear of retaliation from those responsible for the Wrongdoing. Emarat will not tolerate harassment or victimization and will take actions, which could involve disciplinary proceedings, to protect Whistleblowers when and after they raise a complaint in good faith.

Any Employee of the company, who retaliates against a person who has submitted a complaint pursuant to this policy in good faith, even if the information is not established as a fraud or other wrongdoing, shall be subject to disciplinary action following which the maximum sanction will be applied.

Note: Should the Whistleblower disclose any information not in accordance with this policy (e.g., disclosing the subject or nature of the Whistleblower’s allegation to the media, social media, or other third parties), he/she may face disciplinary actions including dismissal for breaching confidentiality and conducting an unauthorized contact with third parties / media. In certain exceptional circumstances, disclosure of information to a third parties such as external or Employee’s legal counsel could be allowed. However, the same must be discussed with FI Lead and approval must be obtained prior to any such disclosure or discussion.

6. Reporting Wrongdoing

In the event that an Employee or External Stakeholder identified a potential Wrongdoing, the following steps should be taken:

- 6.1. As a first step, Employees should normally raise concerns with their immediate manager or their superior while External Stakeholders should raise it with their Emarat Point of Contact. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the Wrongdoing.
- 6.2. Complaints may be raised verbally or in writing. Individual(s) who wish to make a written complaint are invited to include as much information available primarily covering the following:
 - The background and history of the Wrongdoing (giving relevant dates);
 - The reason the Individual(s) is/are particularly concerned about the situation; and
 - The extent to which the Individual(s) has/have personally witnessed or experienced the concern (provide documented evidence where possible).
- 6.3. If the Individual(s) is for any reason uncomfortable using the normal business channels (i.e., their immediate manager or superiors/ Point of Contact), they have an option to contact EmTrust.
- 6.4. Users of EmTrust can disclose their complaints using any one of the following mediums for reporting:
 - Use of a dedicated tollfree number which is 800 0357 03992
 - Use of one unique e-mail address which is emtrust@ethics-line.com
 - Access to the Deloitte Tip-offs Anonymous website which is www.tip-offs.com/emtrust
- 6.5. Complaints will be received by Deloitte Tip-offs Anonymous; the external service provider and reports will be prepared for sharing with the following authorised individuals listed in the table below:

Nominee	Designation
Nominee 1	Manager (Risk & Operations Audit)
Nominee 2	Chief Internal Auditor
Nominee 3	Chief Internal Auditor
Nominee 4	Chairperson of Risk & Audit Committee

- 6.5.1. Under normal circumstances, all reports will be sent to both Nominee 1 and Nominee 2 as the primary recipients.
- 6.5.2. However, a relevant escalation process has also been defined for certain circumstances as follows:
 - Should Nominee 1 be implicated, the report is escalated directly to Nominee 2
 - Should Nominee 2 or Nominee 3 be implicated, the report is escalated to Nominee 4

- 6.6. The reports will include only objectively presented information that is in direct relation to the scope of any investigation undertaken for the verification of the alleged facts.
- 6.7. All reports provided by Deloitte Tip-Offs Anonymous to the reporting personnel as indicated above will eliminate any element that could identify the Whistleblower making a complaint. This means that the Individual(s) will remain totally anonymous if they have chosen to use this option.

Note: Although a Whistleblower is not expected to prove beyond reasonable doubt the truth of a complaint, they will need to demonstrate to the person contacted that there are reasonable grounds for the concern.

7. How will Emarat respond

The “Fraud Incident and Investigations Standard Operating Procedures” deals with how Emarat will address or respond to matters reported whether through internal reporting mechanisms or through EmTrust, which is emphasised below:

- 7.1. Emarat will respond to all reports made and will ensure the Employee protection if the complaint is made in good faith. All reports will be properly investigated by a member of the FI team, separate from the recipient of the report. The investigation and the duration thereof will depend on the nature of the matters raised, the difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from the individual if this is possible (based on whether the Whistleblower chose to provide contact details or remain completely anonymous).
- 7.2. The investigations will be handled in a confidential manner and will not be disclosed or discussed with any persons other than those with a legitimate right to such information. The Whistleblower will also be notified of the outcome of an investigation upon request and whenever it is possible, from a legal and regulatory perspective.
- 7.3. Other Considerations include:
 - Emarat shall keep adequate records to protect evidence, ensuring credibility and avoid claims of discrimination.
 - The subject of any complaint also has rights to be safeguarded. Every person should be given ample opportunity to present his / her case and defend the complaint in front of the Investigation team under the FI function.
 - Emarat findings shall not result in a public record unless required by law.