



# Whistleblowing policy





## Policy Approval

**This policy was approved by Board of Directors decision issued on 07/31/2023**



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### **Purpose**

At Alandalus, we are committed to the highest standards of work and ethical behavior, values, openness, and transparency in all business matters. The purpose of this policy is to encourage and empower the proactive reporting of alleged or potential violations related to policy violations, our defined ethical standards, and any unlawful or unethical conduct in our business operations. We hold fair expectations of all employees, volunteers, consultants, contractors, specialized employees, and suppliers to monitor these standards while fulfilling their employment responsibilities within the company.

### **Scope of the Policy**

This policy applies to all employees, temporary employees, contractors, consultants, and volunteers at the company. It also applies to anyone who conducts business with the company, including but not limited to clients, suppliers, contractors, and organizers.

Actions, Activities, and Practices that may be classified as violations include, but are not limited to:

- Embezzlement of funds and assets.
- Misappropriation of equipment and supplies.
- Forgery of documents and signatures.
- Acceptance or solicitation of bribes.
- Violation of job duties.
- Intentional negligence in reporting.
- Misuse of authority.
- Disclosure of confidential information to external parties.
- Destruction of records and properties.
- Exploiting influence for personal gain.
- Owning interests conflicting with the job.

- Obstructing or inciting disruption of work.
- Malicious complaints.
- Providing information without consent.
- Supervision of the reporting of violations is the responsibility of the company's internal audit management, which is responsible for:
  - a. Preserving and safeguarding information, data, reports of violations, investigation results, and corrective actions taken to address the damages resulting from those violations.
  - b. Establishing arrangements to monitor received reports of violations and track the implementation of decisions and recommendations by the violation investigation committees.
  - c. Submitting regular reports to the Audit Committee regarding the status of incoming reports of violations
- Identify typical examples of violations.
  - a. Submitting a report of the violation through the approved channels and forms.
  - b. Providing all necessary data, information, and documents when filing a report, with as much detail and context about the violation as possible.
  - c. Avoid exploiting the report for personal gains or interests and commit to honesty and good faith in providing reports while refraining from making false or malicious reports that might lead the company to take necessary actions and penalties according to relevant regulations.
  - d. Maintaining the confidentiality of the report and refraining from discussing the subject of the report with other parties or disclosing any of the information and data.



### **Policy Statement:**

The company will promptly investigate any reports. The investigation will be conducted confidentially and impartially to the greatest extent possible. If the investigation uncovers misconduct, the company will take appropriate corrective action, which may involve disciplinary measures against the responsible party.

We are committed to protecting whistleblowers and other individuals from retaliation, protecting the identity of whistleblowers and respecting their confidentiality. We will endeavor to provide whistleblowers with the opportunity to report anonymously and will take protected concerns seriously and investigate protected concerns in a diligent and effective manner.

Other departments may participate in investigations based on their areas of responsibility or oversight expertise.

### **Employee Responsibility:**

**a) Anonymous reporting** - To ensure accountability and responsibility in reporting, anonymous complaints will be investigated to the greatest extent possible, recognizing that anonymity imposes limitations on the investigation.

**b) Integrity** - Whistleblowers who report in good faith in accordance with this policy should not face any forms of harassment or negative employment consequences if they are employees, such as demotion, denial of promotion, or reduction in compensation. Any individual who harasses a whistleblower pursuant to this provision shall be subject to disciplinary measures, up to and including termination of employment, dismissal from a volunteer position, or suspension of privileges.

**c) Act in good faith** - When making a report, the whistleblower must act in good faith and have reasonable grounds for the allegation. A whistleblower who submits unsubstantiated reports that are knowingly false or made with malicious intent will be subject to discipline, up to and including termination of employment, dismissal as a volunteer, or suspension of privileges.

**d) Confidentiality** - The Compliance Officer or Ombudsman commits to maintaining the confidentiality of reports to the greatest extent possible, in accordance with legal and ethical duties.

### **Reporting Procedures:**

Employees are required to report any suspicious matters to their immediate supervisor or any other supervisor, manager, or company official. If an employee is uncomfortable reporting the matter to their supervisor or another supervisor, they may report it to the Company's Compliance Officer or any member of the Legal Department.



If an employee is not comfortable reporting the matter internally, they may report it outside the company by using the Ethics Defenders Hotline or sending an email to the company whistleblower email address. Any employee should use the hotline to report crimes or send an email specifying the company name and contact information for follow-up on the report.

### **Compliance with laws**

We are committed to fair and ethical business practices and to preventing or reducing all forms of corruption. We investigate any reported potential violations and are committed to complying with all applicable laws, including local and international laws.

### **Conclusion**

We encourage all employees to report any questionable matters, and they must do so in accordance with this policy. The company emphasizes creating a safe and ethical work environment where there is no bias when making any specific decision.

### **Final provisions**

- 1- This policy will enter into force as of the date of its approval by the Board of Directors.
2. This Policy is reviewed periodically - when necessary - By internal audit management and is responsible for reviewing the policy and reviewing and recommending updates, if necessary, at least annually or upon changes to higher order policies or legislative requirements or following any significant event or incident that may warrant a change to this Policy. Any amendments proposed by management are presented to the Governance Department, which studies and reviews the proposed amendments and recommends their approval.
3. The administration participates with other departments in any amendments or proposals to this policy and takes their opinions and comments in order to achieve the goal behind it.