

Policy and Procedures for Reporting Violations (Whistleblowing)

First - Introduction and Objectives:

- This policy aims to promote professional behavior and ethical values to create a healthy work environment for expressing doubts and concerns about any improper or suspicious practices.
- Appropriate mechanisms have been established to facilitate stakeholders in notifying the company's board of directors about any improper practices they may encounter within the company, while providing appropriate protection for those who report.
- Suitable mechanisms have been put in place that allow company employees to internally report their suspicions about any improper practices or matters that raise doubts in financial reports, internal control systems, or other issues, as well as arranging suitable arrangements to allow for an independent and fair investigation of these matters while ensuring that the whistleblower is granted confidentiality to protect them from any negative repercussions or harm that may result from their reporting of such practices. This is applied within the framework of the policies and procedures for reporting violations that are adopted by the board.
- This policy applies to the board, the executive management, all employees, consultants, contractors, suppliers, clients, and/or any other parties that have a business relationship or shared interests with the company (stakeholders), without discrimination.
- This policy has been prepared in accordance with the governance rules issued by the Capital Markets Authority in Book Fifteen:
 - A. Rule Six concerning the promotion of professional conduct and ethical values.
 - B. Rule Nine concerns the recognition of the role of stakeholders.

Second - The Scope:

- Reporting violations is a means that enables employees and stakeholders to report any genuine concerns or suspicions without the risk of retaliation, as reporting gives the company the opportunity to verify the validity of those concerns and take appropriate actions to protect its interests.

Third - Reporting Responsibility:

- Reporting violations is the responsibility of all employees and stakeholders in compliance with the highest standards of professional conduct and ethical values. It is mandatory to report directly whether there is conclusive or inconclusive knowledge of any of the violations outlined in the section 'Types of Violations'.

Fourth - Types of Violations:

- Below is a list of some types of violations that necessitate reporting as follows:
 - 1 Inadequacy in controls and internal auditing systems or non-compliance with them.
 2. Fraud or error during the process of preparing any financial data, evaluating it, reviewing it, auditing it, or in recording or preserving financial records.
 3. Negligence, misleading, withholding information, fraud, or error in providing misleading data regarding any item of financial data or financial reports or external audit reports, and any other reports submitted to senior management and/or executive management committees, and the board of directors that result in decisions conflicting with the interests of the company, shareholders, and stakeholders.
 4. Exploitation or abuse of insider information, resources, and assets through the influence of position or authority to achieve personal or third-party benefit.

5. Direct and/or indirect practices that cause damage to reputation, the work environment, assets, and resources, or pose a threat to the interests of the company.
6. All cases that result in a violation of the applicable laws and regulations leading to a violation or crime.
 - Hence what has been mentioned above, violations that do not affect the company's reputation and do not result in financial loss or violations of laws, such as complaints related to employee matters, benefits, salaries, and stakeholder complaints, are directed to the Human Resources department.

Fifth - Standards for Dealing with Reports:

- The reporting standards include three main axes: investigation, protection, and confidentiality, according to the following details:
 1. Investigation:
 - Investigation procedures start as soon as the report is received, ensuring transparency, objectivity, neutrality, and fairness, regardless of the location, title, job level, years of service, or existing or past dealings. Any member of the investigation committee or an executive management member who is a party to the report as a defendant or a witness will be excluded or replaced to ensure the neutrality, independence, and fairness of the investigation.
 2. Protection Guarantees:
 - All employees and/or stakeholders who report in good faith a violation or testify, assist, or participate in any way in the investigation or hearing are protected from job or position loss, and from any form of punishment, intimidation, coercion, discrimination, retaliation, harmful or arbitrary practices, or any consequences that may negatively affect them, either in the workplace or outside of it.
 - The confidentiality of the whistleblower's identity is maintained within the scope of the investigation procedures and in accordance with applicable laws, policies, and procedures.
 - If the whistleblower believes that an arbitrary decision has been made against them as a result of reporting any suspicious behavior, they can notify the Secretary of the Board of Directors or send a formal letter or email directly to the Secretary, who will promptly inform the Chairman of the Board.
 - If it is proven that the whistleblower's claim regarding arbitrary treatment conflicting with the protection policy or deficiencies in the investigation procedures or its outcomes is valid, the Chairman of the Board will take corrective actions based on the whistleblower's submission or any other reasons based on their assessment of the situation.
 3. Confidentiality:
 - Given that the reports involve sensitive and confidential information, this policy ensures the protection of the reporter's identity as much as possible and in accordance with what the investigation requires.

Sixth - Proper reporting standards:

- The company established an open-door policy, and in addition, reporting standards for violations have been set to make sound decisions regarding investigating incoming reports. These standards rely on several key pillars, and no report can be considered investigable unless all these pillars are collectively fulfilled, which are as follows:
 1. Disclosure of identity.
 2. Seriousness.
 3. Credibility.
 4. Good faith.
 5. Risk / significance.
 6. Existence of evidence that can be relied upon.

- The Chairman of the Board and/or the investigation committee has the right to close any report or investigation for insufficient or unfulfilled criteria mentioned above.
- Any member of the investigation committee or an executive management member shall be excluded or replaced if they are a party to the report as a defendant or as a witness to ensure neutrality, independence, and fairness of the investigation.
- Any complaint will be escalated to become a report if evidence and proof warrant the conversion of the complaint into a report within the framework of "Cases and Types of Reports" by submitting the matter along with all details, information, and recommendations to the Secretary of the Board of Directors to present to the Chairman of the Board for a decision on whether to refer the complaint to the investigation committee.

Seventh - Reporting Mechanism:

- The reporting mechanism for employees/stakeholders is limited to the following:
 1. Reporting by filling out the misconduct reporting form on the company's official website (Corporate Governance – Reporting Misconduct)
 2. Reporting by sending an email directed to Whistleblowing@altijaria.com, where a response will be requested to fill out all information according to the form.
 3. Reporting by a confidential written letter submitted to the Secretary of the Board of Directors.

Eighth - Formation of the Investigative Committee:

- A specialized investigation committee is formed that has the competence, ability, knowledge, and comprehensiveness to conduct fair, impartial, and independent investigations and to submit necessary recommendations quickly and accurately.
- The committee consists of at least three members with specified alternatives in case one of the members is excluded or unavailable.
- The committee has full authority to consult with experts from among the company's staff in various departments, provided they are not parties to the report.
- The committee may seek approval from the Chairman of the Board to engage an external party or to choose investigators from outside the company, consultants, or other specialists to assist in the investigation process and analyze results, when necessary, with a justification for the request.

Ninth - Responsibilities:

- 1.) Board of Directors:
 - Approval of the policy for reporting violations.
 - Review any reports of significant importance, discuss them, and provide opinions and recommendations regarding them.
 - Review a report on all reports annually.
- 2.) The Chairman of the Board of Directors:
 - Reviewing the reports received from the Secretary and making the appropriate decision and directive for follow-up on the report.
 - Approving the formation of the investigation committee.
 - Elevating reports of significant concern to the Board based on his discretion.
 - Reviewing, evaluating, and approving the recommendations of the investigation committee for implementation or taking other actions regarding them.
 - Presenting an annual report on the violations received to the Board.

- Ensuring that a record of reports is prepared and updated by the Secretary of the Board.

3.) Secretary of the Board of Directors:

The Secretary of the Board of Directors is responsible for managing the reporting process under the supervision of the Chairman of the Board, which includes:

- Receiving reports through the reporting channels specified in this policy and presenting them to the Chairman of the Board.
- Referring to the reports received by the investigation committee based on the Chairman's directives.
- Receiving and presenting the investigation results of the reports issued by the committee to the Chairman of the Board.
- Notifying the reporter of the investigation results.
- Notifying various departments, CEOs, their deputies, and the executive management, especially the Risk Management/Internal Audit/Compliance and Governance departments, of the investigation results. • Ensuring the preparation and updating of the reports register and maintaining it.

4.) The Investigation Committee:

- Reports are received from the Secretary of the Board of Directors according to the approved form along with all documents obtained from the complainant.
- A date for the investigation sessions is set, and the complainant is invited to attend all or some or part of the investigations.
- Details of the investigation session are recorded, and the minutes are signed by all committee members, as well as by the complainant and any witnesses or related parties to sign their statements.
- The recommendations of the investigation committee are issued confidentially to the Chairman of the Board for review, opinion, and guidance.
- Commitment to issue relevant decisions after approving the findings of the investigation and final recommendations in accordance with the company's approved penalty regulations.
- Commitment to notify the relevant external authorities in case of confirming a violation that contradicts the applicable laws.
- The Chairman of the Board or the investigation committee has the right to close any report or investigation for insufficiency or failure to meet the above-mentioned criteria.

5.) Executive Management:

- Ensure that the whistleblowing policy is accessible to all employees and ensure adherence to it.
- Ensure the provision of all data and information requested by the investigation committee.
- Create a culture and raise awareness among employees and stakeholders about the importance of reporting violations without hesitation.

6.) Internal Audit Department:

- Reviewing and evaluating the effectiveness and impact of compliance and application from a regulatory perspective.

7.) Risk Management Department:

- Reviewing and evaluating the effectiveness and impact of compliance and application from a risk management and regulatory environment perspective.

8.) Group Legal Affairs Department:

- Evaluation and provision of legal advice through their role in the committee.

9.) Compliance & Governance Department:

- Reviewing and assessing compliance with all procedures and providing opinions and comments in coordination with the Secretary of the Board of Directors.
- Providing recommendations and suggestions regarding the development and implementation of the policy for reporting violations.

- Reviewing and evaluating the efficiency of the website in terms of governance in general and the means of reporting violations and coordinating with the relevant management in case there are observations or proposals for modification/development.

10.) Marketing & Communications Department:

- Coordination with the IT department and relevant external parties to ensure the provision, development, updating, and availability of a mechanism for submitting reports of violations confidentially and without revealing the identity of the reporter through the designated website and email, accessible to all company employees and stakeholders for external reports.
- Testing and ensuring the security and confidentiality of the submitted reports by ensuring that access to these reports is restricted to the person responsible only.
- Commitment to monitoring the effectiveness of the website and adhering to the directives of the Compliance and Governance Department.

11.) Group Human Resources Department:

- Monitoring compliance with the implementation of approved decisions and ensuring their alignment with internal policies and regulations and the sanctions list.
- Providing recommendations and suggestions regarding the development and implementation of the reporting policy for violations.
- Ensuring that the reporting policy for violations is accessible to all company employees.
- Directing individuals with any inquiries regarding reporting to submit through the approved reporting channels.
- Investigating violations that do not affect the company's reputation and do not result in financial loss or legal infractions, such as complaints related to personnel affairs, job benefits, salaries, and stakeholder complaints.

12.) Learning & Development Unit:

- Coordination with the Compliance and Governance Department regarding the preparation of an educational and development plan for all employees concerning reporting violations through various available means within the company and/or the relevant external authorities as part of the annual training plan.

13.) Department Managers:

- Ensuring that all management employees are fully aware and knowledgeable about the provisions of the whistleblowing policy.
- Fostering an open and positive culture among management employees and other staff in the company to express any concerns they may have.

14.) Employees of the Company:

- Having full knowledge and awareness of the provisions of the whistleblowing policy.
- Reporting any suspicious practices or behaviors to be investigated and dealt with appropriately.

Tenth – Mechanism for dealing with Malicious Reports:

- All reporters should act in good faith and clarify the reasons relied upon to prove the violation reported. If recognized that the report is based on unfounded allegations or is the result of incorrect or malicious claims that may defame the reputation of the company or its stakeholders unjustly, it will be considered a violation itself, and appropriate action will be taken in accordance with the company's approved penalties, depending on the nature of the allegation and its impact.