

Whistleblowing Policy

1- Introduction

Whereas the Arabian Contracting Services Co., out of its adherence to the Code of Conduct with its commitment that honesty and integrity are followed in all business activities and that all violations are reported as stipulated by this policy; the company expects all its employees to apply the highest standards of ethical values and work culture while exercising their duties and responsibilities.

This policy has been prepared for approval by the Board of Directors and as per the laws and regulations of the kingdom.

1-1 What is Whistleblowing?

Whistleblowing is a way to enable employees and stakeholders, including creditors, clients, suppliers, and the community to report any genuine and legitimate concerns without being subject to any harm. Whistleblowing gives the Company an opportunity to check the authenticity of such concerns and take the appropriate procedures to protect its interests.

1-2 Purpose

In line with the values embraced by "alarabia" in conducting its business activities, whether at an individual, team, or organizational level, this policy aims to reinforce its ethical principles, team cohesion, collaborative spirit, and overall organizational culture. By doing so, "alarabia" strives to enhance its business endeavors. These values manifest in the company's highly skilled workforce, characterized by their deliberate decision-making, determination, honesty, and unwavering commitment. Furthermore, they consistently seek

1-3 Objectives

The Arabian Contracting Services Co. seeks through this policy to achieve the following objectives:

- Define the minimum limit of required controls for receiving and processing reports to improve procedures for the company's employees and stakeholders.
- Urge and encourage all Company's employees, and stakeholders not to hesitate to report any violation. Protection is provided for any individual, whether inside or outside the Company, who makes a report on a violation. Such protection is also guaranteed even if the reporting has not yet been validated or proved, provided that it shall be submitted with good intentions.
- Provide adequate protection for the whistleblower against any negative impact that may occur due to the action.
- Maintain confidentiality of whistleblowing procedures.
- Observe provisions of the Corporate Governance Regulations issued by the Capital Markets Authority.

1-4 Scope

The provisions of this policy shall apply to all the stakeholders and employees of “al arabia” at all levels and job degrees, including the executive management team, senior executives, as well as full- and part-time employees.

2- Whistleblowing Policy Practices

2-1 Whistleblowing Responsibility

All the Company’s employees and stakeholders shall be responsible for complying with the highest standards of professional behavior and ethical values and shall report any suspected violation.

All the Company’s employees shall directly report any suspected or probable violation committed by an employee against any law or regulation issued by relevant organizational and regulatory authorities, the internal Regulations of the Company, or common standards and practices. Whistleblowing shall be made according to the official whistleblowing method as per this policy. If an employee does not report any violation that has been aware of as stipulated herein, the Company shall have the right to take punitive action that may reach the termination of service in some events.

The Company, in some cases, shall inform the competent authorities in Saudi Arabia of such violations.

2-2 Reporting Cases

This policy shall be applied in case of genuine concern for the existence of reasonable causes for believing that:

- Theft or fraud is suspected.
- Crime is already committed or is being committed or will likely be committed.
- Real or possible failure by an employee to comply with their legal obligations under the articles of association, regulations, or contracts.
- Previous, current, or future threat to the health or safety of any individual.
- Previous, current, or future harm to the environment.
- Deliberate or probable concealment of any of the above.

2-3 Standards and Procedures

- **Investigation:** Necessary professional investigations shall be carried out by the Internal Audit Department to verify the report’s authenticity, regardless of the reported individual’s term of service, location, functional or job significance, or relation to the Company.
- **Protection:** The Company shall provide the necessary protection for stakeholders who, in good faith, reported any violation, witness, help, or take part somehow in an investigation or hearing against any harassment, intimidation, coercion, discrimination, revenge, or any negative consequences that may harm them. The Whistleblowing policy aims to encourage stakeholders to report dangerous matters inside the Company before trying to resolve it outside it.

- **Confidentiality:** The Company understands that reports made in line with this policy may include sensitive and confidential information and that the Whistleblower may prefer not to reveal his/her identity. Thus, the Company is keen, as much as possible, on maintaining the identity of the Whistleblower confidential. In some cases, where the Company must reveal some necessary information about the identity of the Whistleblower, it shall consider the non-disclosure of such information unless to the concerned parties.

2-4 Whistleblowing Standards

The following standards shall apply upon review of the submitted violation report:

- Seriousness of reporting
- Credibility
- Supporting evidence
- Whistleblower's good intention
- Serious threats against the Company

2-5 Whistleblowing Method

The Company shall adopt the approach of the open-door policy and instruct employees and stakeholders to share their concerns, suggestions, or complaints with a department that can appropriately deal with it. In case of any confirmed or suspected violations of the above, the employee must directly inform the Internal Audit Department.

All other Stakeholders, may make a report via:

E-mail: whistleblowing@al-arabia.com

Tel. No.: +966 92 003 3343

2-6 Responsible Department

The Internal Audit Department receives all reports and relevant matters through Whistleblowing method, social media, and the company's management and staff.

3- Publication

Each department Head/Director in the Company shall inform the department of this policy and its content. Each department Head/Director should submit a report to the Internal Audit Department confirming that each of the department employees has been informed of this policy. The Human Resources Department shall post this policy on the company's official website to stakeholders so that they would be aware of the Whistleblowing method.

This policy shall be effective as of the date of Board approval.

4- Revision and Amendment

The Board shall review this policy on a periodical basis and whenever required in order to make sure that it meets the relevant laws and regulations as well as the requirements of different stakeholders.

Do you have concerns you wish to report?

Access the Policy of Reporting Violations via the website or any other means

Yes

Do concerns coincide with the violation cases set forth in the Policy of Reporting Violation?

No

Inform the Internal Audit Department through the reporting mechanism set forth in the Policy of Reporting Violation

No

Have your concerns been addressed?

Yes

Case Closed

Contact the direct supervisor or the Human Resources Department as per the Corporate Governance Regulations

