



الأهلية للتأمين
AL AHLEIA INSURANCE

Al Ahleia Insurance Company S.A.K.P

Whistleblowing Policy

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1. Purpose of the Policy

This policy establishes the standards and procedures to ensure that complaints handling process is in line with the Company's objectives.

Whistleblower procedures should allow the company's employees to report internally the doubts thereof concerning any unsound practices or issues that raise suspicions in the financial reports or the internal control systems or any other issues. Moreover, proper arrangements that allow conducting an independent and fair investigation concerning such issues shall be developed, along with ensuring confidentiality for the bona fide whistleblower. To ensure protecting the whistle-blowers who report on AML activates or fraud, and other violations.

The management of the Company is responsible for establishing and promoting the culture of transparency across the organization. There shall be clear communication from the management to all the employees and other stakeholders of the Company with regard to the independency mechanism for handling the allegations/complaints against the processes or practices or officials of the Company.

2. Scope

The policy applies to all employees of the Company; in addition, a copy of this policy can be posted on the Company's website.

3. Processes:

3.1. Responsibilities of Management with respect to Complaints

3.1.1 The Chief Executive Officer (CEO) receives, retains, investigates and acts on complaints and concerns of employees regarding any reporting of illegal, unethical or inappropriate events, behavior or practices. Employees are encouraged to report the following, including but not limited to:

3.1.1.1 violation of any applicable law, rule or regulation that relates to corporate reporting and disclosure;

3.1.1.2 Violation of the Company's Code of Ethics.

3.1.1.3 Frauds, deliberate error, deliberate obfuscation or questionable characterization or accounting treatment in the preparation, evaluation, review or audit of any financial statement of the Company or any of its subsidiaries.

3.1.1.4 Deficiencies in or noncompliance with the Company or any of its subsidiaries' internal policies and controls.

- 3.1.1.5 Misrepresentation or a false statement by or to a director, officer or employee of the Company or any of its subsidiaries respecting a matter contained in the financial records, reports or audit reports; and,
- 3.1.1.6 Deviation from full and fair reporting of the Company's consolidated financial condition.
- 3.1.1.7 Doubts thereof concerning any unsound practices or issues that raise suspicions in the financial reports or the internal control systems or any other issues
- 3.1.2 Any employee that is aware of any breach of company policy is responsible for and required to report the event to the CEO.
- 3.1.3 All confirmed incidents shall be reported to the CEO and, where necessary, to the Board of Directors.

3.2. Procedures for receiving Complaints

- 3.2.1 Any allegation shall be made directly to the CEO and/or his designate (whether openly, confidentially or anonymously).
- 3.2.2 Each allegation shall be reviewed by the CEO who may, in discretion thereof, consult with any member of management or employee they believe would have appropriate expertise or information to assist the CEO. The CEO determines whether the management should investigate the allegation, taking into account the considerations set forth in Section 3.3 below.
- 3.2.3 If the CEO determines that management should investigate the allegation, the CEO notifies the Legal advisor in writing about that investigation/conclusion. Management shall thereafter promptly investigate the allegation and shall report the results of its investigation, in writing, to the CEO. Management shall be free in its discretion to engage outside auditors, advisors or other experts to assist in the investigation and in the analysis of results so as to conduct fair and independent investigation.
- 3.2.4 If the CEO determines that it should investigate the allegation, the CEO shall promptly determine what professional assistance, if any, it needs in order to conduct the investigation. E-mail users should exercise caution and judgment when transmitting information that requires authorization, verification or disclosure protection.

3.3. Criteria for Investigating an Allegation

In determining whether management should investigate an allegation, the CEO shall consider the following:

- 3.3.1 Who is the alleged wrongdoer? If an executive officer, senior financial officer or other high management official is alleged to have engaged in wrongdoing, that factor alone may militate in favor of the CEO conducting the investigation.
- 3.3.2 How serious the alleged wrongdoing is? The more serious the alleged wrongdoing, the more appropriate that the CEO should undertake the investigation. If the alleged wrongdoing would constitute a crime involving the integrity of the financial statements of the Company, that factor alone may militate in favor of the CEO conducting the investigation.
- 3.3.3 How credible the allegation of wrongdoing is? The more credible the allegation, the more appropriate that the CEO should undertake the investigation. In assessing credibility, the CEO should consider all facts surrounding the allegation, including but

not limited to whether similar allegations have been made in the press or by analysts.

3.4. Protection of Whistleblowers

Consistent with the policies of the Company, the CEO shall not retaliate and tolerate any retaliation by management or any other person or group, directly or indirectly, against anyone who, in good faith, makes an accounting allegation or provides assistance to the CEO, management or any other person or group (including any governmental, regulatory or law enforcement body) investigating an allegation. The CEO shall not reveal the identity of any person who makes a good faith accounting allegation and who asks that his or her identity as the accuser remain confidential. Ensuring confidentiality for the bona fide whistle-blower to ensure protecting him against any negative reaction or damage that may be caused thereto due to reporting such practices.

Develop a mechanism that allows the company's employees to report internally the doubts thereof concerning any unsound practices or issues that raise suspicions in the financial reports or the internal control systems or any other issues. Moreover, proper arrangements that allow conducting an independent and fair investigation concerning such issues shall be developed, along with ensuring confidentiality for the bona fide whistle-blower to ensure protecting him against any negative effect or damage that may be caused thereto due to reporting such practices.

3.5. Records

The CEO shall retain, for a period of (10) years, all records relating to any allegation as well as the investigation of such allegation.

3.6. Procedures for making Complaints

In addition to any other avenue available to an employee, any employee may report any allegation to the CEO openly, confidentially or anonymously. Allegations can be made orally or in writing to the CEO.

4. Whistle Blowing Form

Whistle Blowing Form			نموذج الإبلاغ عن المخالفات		
Date: (DD)	(MM)	(YY)	(سنة)	(شهر)	(يوم)
<p>جميع الشكاوي المبلغ عنها في إطار آلية الإبلاغ عن المخالفات والتجاوزات سيتم التحقيق منها بسرعة وبدقة، وجميع المعلومات التي كشف عنها أثناء التحقيق لن يتم الإفصاح عنها وستبقى في طي الكتمان والسرية، بالقدر الذي يتفق مع إجراء التحقيق واتخاذ أي إجراءات مناسبة، وفقا للقانون المعمول به. (يرجى ارسال النموذج الموقع إلى الإيميل: Compliance@alahleia.com)</p> <p>All complaints reported under the Whistle Blowing Mechanism will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation will remain confidential, to the extent consistent with conducting the investigation and taking any appropriate remedial action, in accordance with applicable law. (Please send the signed form to: Compliance@alahleia.com)</p> <p>هذه الآلية توفر الإجراءات الواجب إتباعها لحماية الموظفين/الأشخاص الذين قاموا بالإبلاغ و الإفصاح عن المخالفات.</p> <p>This Mechanism provides protection against adverse employment actions as covered by the Whistle Blowing Policy</p>					
Wrongdoing Reported by External Party/ Department or Business Unit Employee			الإبلاغ عن الخطأ من موظف/غير موظف		
Location of Whistle Blower (If External Party)			مكان/موقع المبلغ (لغير الموظفين)		
Office (If Whistle Blower is an employee)			مكتب المبلغ (إذا كان المبلغ موظف)		
Department or Business Unit of Employee			القسم/إدارة المبلغ (للموظفين)		
Subject			الموضوع		
<p>Details of Incident</p> <p>Kindly cover the following while reporting the incident:</p> <p>a. What wrongdoing is being reported?</p> <p>b. When did it occur?</p> <p>c. Specific location of the wrongdoing.</p> <p>d. How the individual or firm committed the alleged wrongdoing?</p> <p>e. Why the informant believes the activity to be improper?</p> <p>f. What documentation exists to corroborate the allegations?</p> <p>g. Other witnesses (if any) to the alleged wrongdoing.</p>			<p>تفاصيل الواقعة / الحدث</p> <p>الرجاء ذكر التفاصيل التالية عند الإبلاغ</p> <p>1. ما هي المخالفة المبلغ عنها؟</p> <p>2. متى حدث؟</p> <p>3. تحديد المكان الذي وقعت فيه المخالفة</p> <p>4. كيف حدثت المخالفة المزعومة أو الخطأ من الموظف أو الشركة؟</p> <p>5. لماذا يعتقد المبلغ أن المخالفة غير لائقة؟</p> <p>6. ما هي الوثائق المتوفرة لدعم مصداقية الحادثة؟</p> <p>7. ذكر الشهود (إن وجد) أثناء الواقعة.</p>		
<p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>					

