



**Ooredoo Oman**

**Whistleblowing Policy & Procedures**

**External Version**

Classification: **Public**

## **1. Policy Objectives:**

Omani Qatari Telecommunication Company SAOG (“Ooredoo Oman” or the “Company”) is committed to high standards of transparency, integrity, compliance and accountability. The Whistleblowing Policy aims to provide guidance in Whistleblowing matters for different (internal & external) parties who could, in good faith, report any activity that violates laws, regulations, policies, decisions, instructions or the Company’s Code of Business Conduct & Ethics.

This Policy establishes the mechanism for the receipt, analysis and processing of reports for violations of laws, regulations, policies, decisions, instructions or Company’s Code of Business Conduct & Ethics. In addition, the Policy also covers issues related to deficiencies in the system of internal controls, violation of confidentiality of Company information, fraudulent attempts or any errors that may have a negative impact on the Company, its employees, customers, shareholders, investors or others in general.

The Policy also aims to:

- Help develop a culture of openness, accountability and integrity.
- Encourage staff to report suspected Wrongdoing without fear of Retaliation.
- Provide staff and other stakeholders with guidance on how to raise their concerns.
- Inform Management of any Misconducts at an early stage.
- Reassure employees that they are protected from punishment or unfair treatment for disclosing concerns in good faith and in accordance with this procedure.

## **2. Confidentiality and Protection:**

Whistleblowing reports are kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and the Company’s obligations under applicable laws.

The Company will not retaliate or threaten to retaliate against any employee who, in good faith, reports a possible violation as per this Whistleblowing Policy, or who cooperates with any investigation of such a report, whether or not it is determined that an actual violation has occurred. If the Whistle-blower was involved in an activity that is found in violation, appropriate disciplinary actions shall be taken, though a voluntary disclosure may be given favourable consideration in the discipline process as per the Company’s People Policy.

### 3. Scope:

This Policy applies to all employees of the company (full-time, part-time and temporary), in addition to external parties, including agents, consultants, contractors, subcontractors, suppliers, customers and generally anyone who has business relationships with Ooredoo Oman.

To ensure active implementation of this policy, the Company will publish this Policy on the intranet and Company website. The Company will also communicate this Policy internally through different internal communication channels on an annual basis.

### 4. Definitions:

In the application of this Policy, words and phrases have the following meanings assigned to them, unless the context otherwise requires:

<b>Whistleblowing</b>	Any notice or disclosure of information which relates to suspected violations, Wrongdoing, behaviors or practices that are inconsistent with the Company’s Code of & Business Conduct Ethics, regulations, policies, decisions, or breach of legal, statutory or regulatory requirements that may damage or prejudice the image of the Company, its subsidiaries or affiliates.
<b>Whistleblower</b>	A person or entity that discloses improper or illegal activities, whether Ooredoo Oman employees or third parties including, for example, applicants for employment, agents, consultants, suppliers, contractors, subcontractors, customers, partners or the general public.
<b>Good Faith</b>	Good faith is assumed if reports are not made by malice or for personal benefit, and there is reasonable basis to believe that the report is true, and does not contain false information and data. In all cases, the good faith is associated with proving the authenticity of the report.
<b>Wrongdoing/ Misconduct/ Improper Activities</b>	These include practices as set out in Section 5 of this policy.

<b>Retaliation</b>	<p>Means any direct or indirect detrimental action that adversely affects the employment or working conditions of an individual, where such an action has been recommended, threatened or taken for the purpose of punishing or intimidating an individual because that individual engaged in an activity protected by this policy.</p>
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## 5. Reporting Channels:

Whistleblowing reports are directly received and handled by the Head of Internal Audit. Any person may report perceived or actual violations/Wrongdoings/Misconduct on a confidential basis through the following Whistleblowing channels:

- Whistleblower Report Form available over Ooredoo Oman website: <https://www.ooredoo.om/en/whistleblower/>
- Whistleblowing Reporting Form available over Ooredoo Group website: <https://ooredoo.com/en/whistleblower/>
- Direct email: [whistleblower@ooredoo.om](mailto:whistleblower@ooredoo.om)
- Post: Head of Internal Audit  
4th floor, Tilal Complex (Muscat Grand Mall), Muscat, Oman.
- Phone: +968 22003377

The reporting channels described will also be available on Ooredoo’s websites.

- a. The Head of Internal Audit (HIA) shall notify the sender and acknowledge receipt of the reported violation within five (5) working days.
- b. Relevant information will be required from the person reporting such misconduct or improper activities in accordance with Form available over Ooredoo Oman website: <https://www.ooredoo.om/en/whistleblower/> .

The identity of the Whistleblower, if known, shall remain confidential as far as possible. For the avoidance of doubt, the above reporting channels shall not guarantee individual immunity under circumstances where the Whistleblower has also been involved in the activity.