



Ooredoo Oman

Whistleblowing Policy & Procedures

External Version

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. 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.

3. 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.

Classification: **Public**

3.1 Anonymous Reporting:

- To further safeguard the Whistleblower, the Company has established secure and anonymous reporting channels. Whistleblower can choose to report concerns anonymously.
- Anonymous reports will be treated with the same level of seriousness and thoroughness as those made with disclosed identities. Anonymous Whistleblowers are encouraged to provide as much detail as possible to facilitate the investigation.

4. Whistleblowing Practices

This Policy governs the process of reporting and investigating inappropriate behaviour and illegal activities within the Company. The use of the whistle is to alert/report about certain types of Wrongdoing. These would generally relate to – but not limited to:

- Accounting fraud
- Bribery, theft and any form of corruption/ information leakage
- Tax evasion
- Money laundering
- Financing of terrorist organizations
- Insider trading.
- Unauthorized use or disclosure of Personal Data or Company information.

5. Definitions:

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

Whistleblowing	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.
Whistleblower	A person who becomes aware of any wrongdoing/illegal activities within Ooredoo Oman, and comes forward and shares the knowledge on it.
Good Faith	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.

Classification: **Public**

Wrongdoing/ Misconduct/Improper Activities	These include practices as set out in Section 4 of this policy.
Retaliation	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.
Personal Data	Data that makes a natural person identifiable directly or indirectly by reference to one or more identifiers such as a name, civil number, electronic identifiers data, spatial data, or without reference to one or more factors related to genetic, physical, mental, psychological, social or cultural identity or economic.

6. 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
- Post: Head of Internal Audit
5th floor, Tilal Complex (Muscat Grand Mall), Muscat, Oman.
- Phone: +968 22003377

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.