

Speak Up Policy (2016-SKA-HR-005)

POLICY

Table of Contents

1. Document Control	3
2. Scope	4
3. Introduction	4
4. Who can Speak Up?	4
5. What concerns are covered by this Speak Up Policy?	4
6. How to Speak Up?	5
7. Speak Up channels	5
8. Why Speak Up?	5
9. What Information do you need to provide?	5
10. Confidentiality	6
11. Non-retaliation	6
12. Misuse	6
13. Follow-up Action after you Speak Up	6
14. Investigation	6
15. Actions if you have a concern against the follow up report	6
16. Workflow	7

POLICY

Document Control

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POLICY

1. Scope

1.1 The purpose of this policy is to explain how employees, contractors and business partners of SKA (the “Company”) can raise concerns in confidence and without fear of retaliation. It also describes what you can expect from the Company if you Speak Up.

1.2 Any queries arising from this policy or its implementation can be taken up directly with the HR Department at speakup@ska-arabia.com.

1.3 SKA is the owner of this document and has approved management responsibility for its development, review and evaluation.

1.3.1 This policy is intended to be read by all employees and contractors for general information and awareness.

2. Introduction

2.1 SKA truly values the help of employees who identify and Speak Up about potential concerns that need to be addressed. Speaking Up is encouraged and employees who Speak Up are protected. You will not suffer for raising concerns in good faith and we do not tolerate any form of retaliation against you Speaking Up.

2.2 We recognize that it is the responsibility of each of us to Speak Up if we see something that is unsafe, unethical or potentially harmful in confidence and without fear of retaliation.

3. Who can Speak Up?

3.1 The Speak Up policy is available to everyone working for or on behalf of our Company. It is also open to any party with whom our Company has or has had some type of business relationship.

4. What concerns are covered by this Speak Up Policy?

4.1 This Speak Policy can be used to raise concerns about suspected misconduct within the Company.

4.1.1 Examples of concerns that can be raised using this policy are:

- Environmental, health and safety issues
- Discrimination or harassment
- Improper use of company resources
- Fraud
- Bribery
- Disclosure of confidential or commercial information

POLICY

- Violations of competition laws and rules
- Conflicts of interest

4.1.2 Do not use this policy for:

- To settle personal disputes
- To make accusations which you know are false.

5. How to Speak Up?

5.1 Our Speak Up policy allows you to raise concerns through a variety of channels. This policy does not replace the Company's regular reporting chains for operational and routine matters. If you feel that is not appropriate, please raise your concerns through the Speak Up channels.

6. Speak Up channels

6.1 Please refer to the Speak Up channel workflow at Annex A (please post on noticeboards).

6.2 If the concern has an immediate environmental or health and safety impact then you should take the necessary steps to either talk to the person involved or rectify the problem yourself.

6.3 As a general guideline the first person you should approach when raising a concern is your line manager. Alternatively, you may choose to discuss your concern to the local HR representative or another part of the management team who can mediate personally on your behalf.

6.4 If none of the above are deemed suitable you can contact the Dubai corporate office HR Department direct by phone or using the confidential email address speakup@ska-arabia.com.

7. Why Speak Up?

7.1 We strongly encourage you to raise concerns through the available channels. By Speaking Up internally, you give the Company the chance to look into the matter and take the necessary action if needed.

8. What Information do you need to provide?

8.1 When you raise a concern (in person, in writing or by phone), please provide as much detailed information as possible to enable us to assess and investigate your concern, such as:

- names, dates, places and other relevant information
- the background, history and reason for the concern
- any documents that may support your report

POLICY

8.2 A report can only be followed up if it contains sufficient information and there is a reasonable possibility of obtaining further information.

9. Confidentiality

9.1 All the reporting is confidential. This means that the information about your concern will only be shared with a limited number of people on a strict need to know basis. We will carry out the investigation and take the necessary action but your identity will not be disclosed. Therefore, you can protect yourself by being discreet and not discussing your concern with your colleagues.

10. Non-retaliation

10.1 Speaking Up is encouraged and employees who Speak Up are protected. Please feel confident that you will not suffer for raising concerns in good faith. Any form of retaliation or threat will not be tolerated. Retaliation will be treated as a very serious disciplinary matter. You will not be protected, however, if you maliciously raise a concern that you know is false.

11. Misuse

11.1 If an employee misuses this policy or knowingly makes a false accusation or lies to investigators this may lead to disciplinary action being taken against them.

12. Follow-up Action after you Speak Up

12.1 The Company takes every Speak Up report seriously. If you submit a report you will receive a confirmation receipt within 1 working day with an estimate of the time it will take to assess your concern. Your report will undergo an initial review and if necessary an investigation. On average you will be informed of overall findings and closure of the matter within 7-10 working days.

13. Investigation

13.1 The initial review and investigation will be handled by the appropriate Subject Matter Expert and passed to either the HR Director or Senior Vice President for a final decision.

14. Actions if you have a concern against the follow up report

14.1 If you believe that your concern raised has not been handled appropriately or that the investigation has not been performed correctly you can inform the CEO.

POLICY

