



Document Number: SRM-PLC-004

Whistleblower Protection Policy

Table of Contents

TABLE OF CONTENTS	2
1 PURPOSE	3
2 REPORTING RESPONSIBILITY	3
3 NO RETALIATION	4
4 REPORTING PROCEDURE	4
5 ACCOUNTING AND AUDITING MATTERS	5
6 ACTING IN GOOD FAITH	5
7 CONFIDENTIALITY	5
8 HANDLING OF REPORTED VIOLATIONS	5
9 GOVERNANCE AND OVERSIGHT	5

1 Purpose

At Somali Risk Management (SRM) we all have a responsibility to ensure that we uphold our core business values, adhere to the law and deliver against the important commitments set out in our code of ethics policy.

To help strengthen our culture of ethics and integrity, employees are strongly encouraged to report breaches of laws, regulations or company policy. This will help SRM to develop an open culture in the dealings between employees and those with whom it engages.

The Whistleblower Policy is to be made available to every employee through a wide range of communications channels such as induction, joining instructions, notice boards, the company website and policy manuals.

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

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

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

2 Reporting Responsibility

This policy is intended to encourage and enable employees and others to raise serious concerns internally so that SRM can address and correct inappropriate conduct and actions.

It is the responsibility of the management, supervisors and employees to report concerns about violations of SRM's code of ethics or suspected violations of law or regulations that govern SRM's operations.

3 No Retaliation

It is contrary to the values of SRM for anyone to retaliate against any employee of SRM who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of SRM.

An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

4 Reporting Procedure

- a) This policy is intended to encourage all the employees to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviors or practices) without retribution.
- b) The Whistleblower should promptly report the suspected or actual event to his/her supervisor.
- c) If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower could report the event to the next highest or another level of management, including to direct to the HR department.
- d) The Whistleblower can report the event with his/her identity or anonymously.
- e) The Whistle blower shall receive no retaliation or retribution for a report that was provided in good faith - that was not done primarily with malice to damage another or the organization.
- f) A Whistleblower who makes a report that is not done in good faith is subject to disciplinary action, including termination or other legal means to protect the reputation of the organization and its employees.
- g) Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, including termination.
- h) Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
- i) Supervisors, Managers and/or members who receive the reports must promptly act to investigate and/or resolve the issue.

- j) The Whistleblower shall receive a report within 5 (five) working days of the initial report, regarding the investigation, disposition or resolution of the issue.
- k) If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
- l) The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.

5 Accounting and Auditing Matters

Any complaints related to Accounting and Auditing, corporate accounting practices, internal controls or auditing shall be immediately notified to the HR Department and appropriate action shall be taken until the matter is completely resolved.

6 Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

7 Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation

8 Handling of Reported Violations

The complainant's complaint will be acknowledged. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

9 Governance and Oversight

This policy will be reviewed annually for applicability by top management of SRM.