

## ADWIA Whistle Blowing Policy

Policy owner	Reda Hassan, Compliance Officer
Approval Date	10 Nov 2021
Effective Date	10 Nov 2021
Approved by	Board of Directors
Revision History	<ol style="list-style-type: none"><li>1. Changing the Policy Owner to Reda Hassan Compliance officer</li><li>2. Changing the email address at section no 8, (<a href="mailto:ADWIA.whistleblowing@Kelixbio.com">ADWIA.whistleblowing@Kelixbio.com</a>) to (<a href="mailto:askcompliance@adwia.com">askcompliance@adwia.com</a>) as the old one is inactive</li></ol>
Version no	02

---

## TABLE OF CONTENTS

	Page
1 Introduction	3
2 Purpose	3
3 Applicability	3
4 When should an employee speak up?	3
5 Anonymity	4
6 Protection	4
7 Reporting in good faith	4
8 Communication Channels	4
9 Who can use the reporting process?	4
10 Information to be Provided	4
11 Handling of Concerns and the Appeals Process	5
12 Disciplinary action	5
13 Confidentiality and Retention of Documents	5
14 Review and update to Policy	5



## 1 Introduction

ADWIA is committed to fostering an organisational culture of ethics and a harmonious and inclusive work environment, anchored in the values of commitment to excellence, integrity, responsibility, transparency and respect for people and the environment.

In order to achieve its objectives, ADWIA and all its subsidiaries must have a strong corporate culture that embodies the values of the organization. With this in mind, an Employee Code of Conduct along with other integrity and ethics related policies was established to lay down the principles and standards that should govern the actions of ADWIA, its Board of Directors, its employees, subsidiaries, and third-party service providers.

## 2 Purpose

The management of ADWIA encourages all employees that have any concerns to seek advice from their line manager in the first instance or to contact their Ethics, Risk and Compliance Officer. In the event that these channels are not suitable, or the concerns may need further review or investigation, then the employee should follow this Policy to disclose their concerns.

## 3 Applicability

This Policy applies to the Board members, all employees (including temporary and on contract personnel), consultants, contractors, trainees, ex-employees, stakeholders, vendors and service providers of ADWIA or any of its subsidiaries.

The policy is designed to deal with concerns raised in relation to issues, which are in the interest of ADWIA and may have adverse legal, reputational and/or financial impact on it. Only genuine concerns should be reported although actual evidence of potential wrongdoing is not necessary.

## 4 When should an employee speak up?

This Policy explains how an employee with a relevant concern about improper behaviour can disclose it. Any issues that indicate the following may be reported.

- Possible breaches of the Code of Conduct
- Fraud; dishonesty, corruption
- Failure to comply with legal obligations including but not limited to; suspected fraud, malpractice, or breach of any best practice - including any applicable code of business conduct.
- Misuse or abuse of assets of the Company including its funds.
- A danger to the health and safety of any individual
- A danger to the security and safety of any individual, assets or the environment

## 5 Anonymity



ADWIA shall accommodate reports from individuals who wish to remain anonymous. However, if total anonymity is requested, it is important to note that successful investigation and resolution of the matter may depend on the amount of information shared and ongoing interaction.

There are limits on ADWIA's ability to investigate and resolve issues in circumstances in which the Whistle Blower chooses to remain anonymous. Therefore, bearing in mind our commitment to confidentiality, Whistle Blowers are encouraged to provide as much information as possible.

## **6 Protection**

ADWIA undertakes that no one who reports any concern or wrongdoing under this policy in good faith will be subjected to any form of retaliation for coming forward, regardless of whether or not the matter is ultimately substantiated.

In the event that a person believes that they are experiencing any form of retaliation (whether financially, career based or socially) by any person within ADWIA as a result of reporting a concern or wrongdoing or in assisting management in any investigation under this policy, they must inform the Chief Executive Officer (CEO) or the Chairman of the Audit and Risk Committee (ARC) immediately. Such party will take appropriate action to protect the relevant individuals from any reprisals.

## **7 Reporting in good faith**

If the reportee makes an allegation in good faith, but it is not confirmed by investigation, no action will be taken against the employee. Disciplinary action may be taken against the employee, if the employee makes false allegations with malicious intent.

## **8 Communication Channels**

We encourage all employees that have any concerns to seek advice from their line manager in the first instance or to contact their Ethics, Risk and Compliance Officer. In the event that these channels are not suitable, or the concerns may need further review or investigation, then the employee should communicate their concern to the confidential e mail below.

[askcompliance@adwia.com](mailto:askcompliance@adwia.com)

## **9 Who can use the reporting process?**

While this policy is prepared primarily for employees of ADWIA this policy can also be used by any contractors, stakeholders, third parties such as agents, or any other interested business partners involved with ADWIA.

## **10 Information to be Provided**

Where possible, reportees should include the following information:

- An outline of the known or suspected wrongdoing.

- Details, to the best of the Whistle blower e's knowledge, about when, where, and how it occurred.
- The names of those suspected of being involved (both internally or externally).
- A list of those who may have the relevant information or files.
- Details of how the Whistle blower came to know about the suspected activities.
- What, if any, breaches of internal controls, policy, procedures, or other requirements the employee believes took place.
- Any specific recommendations the employee has for actions.
- The names of anyone who the employee has discussed or reported this concern to.
- The employee's name and contact details. This will be kept confidential as far as is reasonably practicable; and
- The date and time of making the report.

## 11 **Handling of Concerns and Appeals Process**

ADWIA should establish clear procedures on how to handle concerns including the investigation process and the subsequent appeals process. These procedures should be disseminated to all employees.

## 12 **Disciplinary action**

If during the course of the investigation it is discovered that the matter has not been reported in good faith (e.g., as part of a victimisation campaign or based on purposely false or misleading information known to the relevant person), this will be subject to investigation and disciplinary procedures as per Company policy.

## 13 **Confidentiality and Retention of Documents**

All documents received from the Complainant and evidence obtained during the investigation and the report shall be maintained in strict confidentiality and retained in accordance with applicable laws unless, disclosure is mandated by a court order or is otherwise necessary to comply with the requirements of applicable laws.

## 14 **Review and update to Policy**

This Policy should be reviewed at least bi-annually and additionally if external circumstances such as changes to the local laws so require. Amendment is delegated to the Chair of the Audit and Risk Committee, who in consultation with management will report such amendments to policy to the Board.