



# Whistleblowing Procedures

## Contents

Introduction .....	3
A. Reporting of Misconduct.....	3
I. Employees reporting.....	3
II. Whistle blow Reporting Channels.....	3
III. No retaliation Policy.....	4
B. Roles of Compliance Officers/Champions.....	4
C. Complaints classification .....	4
IV. Major cases .....	4
V. Standard Cases.....	5
D. Assessment of Allegations .....	5
E. Involvement of other functions .....	5
F. Mitigation Measures .....	5
G. Complaints Logging.....	6
H. Periodic Reports.....	6
I. Awareness and Training .....	6
Annex A.....	7
preliminary Investigation report.....	7
Annex B .....	9
Complaints Log.....	9

## Introduction

The reputation of Elsewedy electric and all of its subsidiaries and affiliates is based upon the trust which our customers, share-holders, Employees and the general public have in the integrity of our operations. We strongly prohibit employees retaliation due to reporting an illegal or questionable activities in good faith (please see Elsewedy Code of ethics and business conduct for more clarifications).

The purpose of this Guideline is to ensure that any illegal or improper misconduct can be addressed properly within the company in order to protect our operations and our employees across the group from the results of such misconduct. This Guideline sets out principles for the handling and coordination of received reports.

A whistle blow is any allegation by an employee or an external party in an anonymous or non-anonymous means regardless of the channel of communication, relating to possible violation of the Company's Code of ethics and business Conduct or any applicable laws or regulations.

If local law or regulations are stricter than this Guideline these laws and regulations prevail. If local internal rules contradict with this Guideline, Group Compliance has to be informed.

## A. Reporting of Misconduct

### I. Employees reporting

ELSEWEDY is committed into setting a thorough compliance culture, you are encouraged to report any violation, misconduct, illegal act (i.e. fraud, corruption, bribery...etc), unethical behavior (i.e. discrimination, harassment...etc) or actions that violates any of the following:

- Company's code of ethics and business conduct;
- Internal rules and procedures;
- Company's values;
- Violation of applicable laws or regulation;
- Ethical conduct;
- accounting, internal accounting controls.

We kindly ask you to immediately contact the compliance department or your company's compliance champion to report any violations.

Your whistleblow will stay completely anonymous subject to your request, however, the whistleblower must commit to seek credibility and objectivity avoiding while reporting any rumors, personal differences and allegations which are not based on facts.

Elsewedy prohibits any form of retaliation against an employee who reports in good faith any known or suspected misconduct.

### II. Whistle blow Reporting Channels

Employees can voice their concerns about possible violations to:

- Whistleblowing email (compliance-int@elsewedy.com);
- A compliance officer;

- Compliance champion at your facility;
- Your manager;
- Human resources, Audit or Legal personnel.

Members of management, top management are obliged to forward any information and/or notification made by an Employee directly to Group compliance department in a confidential manner and without undue delay.

### **III. No retaliation Policy**

Elsewedy electric and all of its subsidiaries and affiliates does not tolerate retaliation against any Employee who reports concerns in good faith, however, reports that are not made in good faith (i.e. intentionally providing false information, made maliciously to harm the Company, its Employees or external parties) will not be accepted.

Whenever needed, to support an ongoing investigation employees might be asked to disclose their identity in order to maintain communication during the investigation. Such disclosure will be handled with the highest degree of confidentiality and according to the applicable data protection Laws within the country of operations.

Prior to taking decisions on disciplinary measures the involved Employee should have the opportunity to respond to the allegations **in person**.

### **B. Roles of Compliance Officers/Champions**

Compliance Officers/Champions are responsible for the below:

- Providing guidance and advice for the implementation of this Guideline, while monitoring its implementation;
- Acknowledging, handling and monitoring promptly, professionally, fairly and diligently all cases escalated to or directly reported to Group Compliance;

### **C. Complaints classification**

### **IV. Major cases**

Any case received by Group Compliance or a compliance champion, which fulfils one or more of the below escalation criteria is classified as a Major Case:

- Any allegation against any executive reporting directly to the Board or the CEO;
- Any allegation related to financial, accounting fraud, expropriation to corporate fund;
- Any allegation of a violation of antitrust law.
- Any case of potential corruption on local/regional level; no threshold.
- Discrimination, harassment or any other activity which all may have a serious impact on the company's reputation/financial status.
  - Cases relating to physical threat, extortion/blackmailing or any other similar serious issue relating to personal safety.

## V. Standard Cases

Any complaints received alleging a code of ethics and business conduct breach and does not fall under the criteria of a major case is to be considered a standard case.

## D. Assessment of Allegations

The Compliance Officer/Champion in charge shall deal with received allegations as follows in order to assess and recommend the steps that should be taken, this includes:

- Any allegation is subject to a preliminary review (please annex A) in order to check its plausibility for investigation
- An investigation plan with the next steps to be taken to handle this allegation;
- Preparation of an action plan to handle the investigation to be shared with the investigation team (if applicable)
- Any investigation shall be conducted in an objective manner and include possible exculpatory evidence.
- All investigations must be closed within 30 days, any time extensions must be justified.

**(for further details about Investigation process please see our Group investigation policy)**

## E. Involvement of other functions

Validated allegations regarding accounting mal practices, internal accounting controls, auditing matters, Fraud, Corruption of Elsewedy electric and all of its subsidiaries and affiliates must be brought to the attention of the Group CEO, in order to approve into forming a panel of other core functions deemed necessary for the investigation process.

Before taking any disciplinary actions, the Lead investigator shall consult with the Legal department in order to be aligned with the local laws and regulations.

## F. Mitigation Measures

The Compliance Officer will coordinate with the Group CEO regarding the implementation of any corrective or disciplinary action resulting from a complaint/conducted Investigation, and the relevant departmental personnel.

Actions may include changes to the Company's controls or policies, self-reporting to regulatory authorities or employee's disciplinary action. If any corrective or disciplinary action involves the CEO, the Compliance Officer will coordinate such actions directly with the Chairman of the Company.

## **G. Complaints Logging**

The compliance department shall keep a log of all received allegations and all conducted/in progress investigations, **(Please see annex B for a detailed view of the Complaints Log)**

## **H. Periodic Reports**

The Compliance department will report periodically to the Chief Executive Officer (the “CEO”) regarding the status of pending investigations. If an investigation potentially implicates the CEO or could potentially be compromised by his participation, a report shall be submitted instead to the Chairman of the Group.

## **I. Awareness and Training**

All Compliance Officers and Compliance champions across the Group must undertake initiatives to ensure adequate knowledge and familiarity with this Guideline. Group Compliance will provide guidance and training to employees and representatives as necessary to effectively implement and maintain this Guideline.

**Annex A**  
**preliminary Investigation report**

<b>Introduction</b>	Received Allegation (list of all allegations received by the Complainant)
	Allegation made by/ Complainant (if not anonymous): Name, title, employee ID, possibility of an interview before starting the investigation)
	Alleged Employee (name, employee ID number, title, direct manager)
	Reason for Investigation: (theft, misconduct, fraud, bribery... etc)
	Investigation Lead: [Name and role]
	Investigation team (if needed) (Name and Roles)
	Investigation Panel: (if needed)
	Date of investigation:
	Primarily assessment: (if the results that the investigation is plausible please move to the below steps)

<b>Process of investigation</b>	Investigation Plan:
	Department in which the incident occurred:
	Affected Process:
	Evidence collected:
	Evidence missing: (List all evidence that could not be collected and why)
	List of interviewees: (List all people interviewed)
	List of witnesses not interviewed? If yes, why?: (List any witnesses that could not be interviewed and why)

	Anonymised statements: (If any, explain why and provide details of any enquiries into witness)
--	--

<b>The investigation findings</b>	Summary of the investigation:
	Evidence/Allegations verified:
	Evidence/Allegations Falsified:
	Mitigating factors: (detail if there were any mitigating factors uncovered that are relevant to the investigation)
	Other relevant information: (detail any other information that is relevant to the matter)

<b>Conclusion</b>	Investigation Lead Recommendation: Formal action/Informal action/No action required		
<b>Action Plan</b>	<b>Action Plan</b>	<b>Targeted Date</b>	

<b>Supporting documents</b>	<b>Type of document</b>	<b>Original/Copy</b>	<b>Concerned department</b>



Case Reference Number	Quarter	Handled by/Lead Investigator	Elsewedy Entity	Allegation made by	Date Received/Detected	Escalation Criteria	Are Press/Media Aware	Status	Source	Anonymity	Case Type	Preliminary Research	Preliminary Research Status	Work Plan	Work Plan Status	Date Closed	Result	Comments

**Annex B**  
**Complaints Log**

