



# ELSEWEDY ELECTRIC

Group Whistleblowing policy

V.2

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## 1 INTRODUCTION

Integrity means being honest and doing the right thing, even when no one is watching. Inevitably, issues may arise. This policy is designed to ensure that if any ELSEWEDY ELECTRIC employee, contractor, agent, intermediaries, suppliers witness or suspects serious misconduct, malpractice, or illegal activities, they can raise their concerns confidently without fear of retaliation.

### 1.1 Policy Statement

ELSEWEDY ELECTRIC Group ('EE') is committed to upholding the highest standards of integrity, ethical behavior, and transparency. We believe in creating a culture of openness and accountability where employees, contractors, and stakeholders feel safe and empowered to raise concerns about serious wrongdoing without fear of retaliation.

This Whistleblowing Policy reflects our zero-tolerance approach to serious misconduct and confirms our dedication to protecting those who, in good faith, report a genuine concern.

### 1.2 Policy Objective

The purpose of this Whistleblowing Policy (the "**Policy**") is to encourage employees, contractors, volunteers, and other stakeholders (collectively, "Whistleblowers") to raise concerns about serious wrongdoing within EE without fear of reprisal. This Policy establishes a clear, confidential, and effective mechanism for reporting such concerns.

### 1.4 Scope

This Policy applies to all EE operations worldwide, all EE subsidiaries, and to every EE employee, agent, contractor, consultant, distributor, supplier or joint venture partner working with the EE or on its behalf ('**Covered Persons**').

Whilst this policy represents the minimum procedural requirements, a different approach can be adopted by local EE subsidiaries where necessary to comply with local laws. In case of conflict between this policy and local legislation, the matter must be submitted to Group Compliance.

## 2 DEFINITIONS

**Whistleblowing:** is the act of reporting any suspicions or knowledge of wrongdoing, misconduct, or illegal activities within ELSEWEDY ELECTRIC. It enables individuals to disclose such concerns in good faith through the company's established reporting channels, supporting a culture of integrity, transparency, and accountability.

**Whistleblower:** is any individual who reports insider knowledge or reasonable suspicion of illegal, unethical, or improper conduct within ELSEWEDY ELECTRIC. This includes employees, former employees, partners, clients, contractors, and suppliers.

### 3 POLICY REQUIREMENTS

#### 3.1 Reportable Conduct

A "Reportable Conduct" is any action, or failure to act, which the Whistleblower reasonably believes constitutes serious wrongdoing or unethical behavior. This includes, but is not limited to:

- Financial malpractice (e.g., fraud, bribery, theft, misuse of company assets, accounting irregularities).
- Criminal offences (e.g., illegal acts, money laundering).
- Health and safety risks (e.g., dangerous working practices or environments).
- Environmental damage.
- Breaches of legal or regulatory obligations.
- Misconduct behavior, or abuse of authority.
- Concealment of any of the above.

**Note:** Concerns regarding personal employment matters (e.g., grievances, performance appraisals, disciplinary issues) should typically be raised in line with EE's existing HR procedures.

#### 3.2 Reporting Channels

EE is committed to ensure open door policy and transparency; concerns should be raised internally to the line manager in the first instance.

Whistleblowers may report their concerns should they prefer to Group Compliance directly through the below channels:

- Speak Up Online Portal: <https://compliance.elsewedy.com>, available in Arabic and English;
- Email: [compliance-int@elsewedy.com](mailto:compliance-int@elsewedy.com)
- Mail: Plot No. 13C03, Cairo Festival City Business Park, 5th Settlement, New Cairo, Egypt.
- Alternative method: Employees without computer access may submit anonymous sealed letters to the head office reception, which will be forwarded unopened to Group Compliance.

The Whistleblower must provide sufficient information to allow for proper investigation, including:

- The detailed nature of the concern.
- The names of the individual(s) involved (if known).
- The date(s) and location(s) of the conduct.
- Evidence or supporting documentation.

#### 3.3 Confidentiality and Anonymity

EE recognizes that whistleblowers may want to remain confidential.

- **Confidentiality:** Group Compliance will make every effort to keep the Whistleblower's identity confidential, only disclosing it on a "need-to-know" basis (e.g., to investigators, legal counsel) or where legally required.
- **Anonymity:** Reports may be made anonymously. However, providing contact details may facilitate a more thorough and effective investigation. If an anonymous report is made, the organization may not be able to provide feedback on the outcome.

### 3.4 Non-Retaliation Policy

The organization strictly prohibits Retaliation against any Whistleblower who, in good faith, reports a suspected Reportable Conduct. Retaliation includes, but is not limited to, dismissal, demotion, suspension, disciplinary action, threats, harassment, or any form of discrimination.

- **Good Faith:** Protection against retaliation is provided to individuals who have a reasonable belief that the information disclosed is substantially true, even if the investigation ultimately finds no wrongdoing.
- **Consequence of Retaliation:** Any employee found to have engaged in retaliation against a Whistleblower will face severe disciplinary action, up to and including termination of employment.

**Note:** Whistleblowers who make reports that they know to be false or malicious will not be protected under this Policy and may be subject to disciplinary action.

### 3.5 Confidentiality and Anonymity

Group Compliance ensures that all disclosures made through approved reporting channels remain confidential throughout the investigation.

Whistleblowers are not required to reveal their identity and will never be forced to do so.

In rare cases where resolving a concern requires disclosure of identity, the Compliance team will consult the whistleblower beforehand to ensure protection from any retaliation or reputational harm.

Whistleblowers must also maintain confidentiality to avoid compromising investigations. EE's Speak Up portal supports anonymity and protects whistleblower identity.

## 4 INVESTIGATION PROCEDURE

### 4.1 New Allegations

Group Compliance shall ensure that all reported allegations are investigated in a timely, fair, and thorough manner.

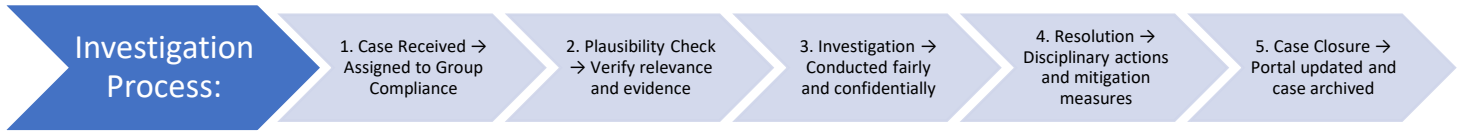
Employees are strictly prohibited from initiating independent investigations or discussing any **case-related confidential information** within or outside the Company.

All reports submitted through the approved reporting channels shall be received and assigned to Group Compliance within one working day from the date of submission. Once assigned, the case status on the Online Portal shall be updated to **"Assigned to Group Compliance."**

Group Compliance will conduct a **Plausibility Check** upon receipt to determine case validity based on two mandatory criteria:

- **Mandatory Relevance:** The reported concern must be related to one of the approved Speak-Up categories.
- **Mandatory Evidence:** The case must be accompanied by supporting evidence or detailed allegations.

## 4.2 Investigation Process



1. **Acknowledgement:** Upon receipt of an allegation, Group Compliance will acknowledge receipt within **two (2)** working days.
2. **Assessment:** Group Compliance will assess the allegation to determine if it falls under the scope of this Policy and if an investigation is warranted.
3. **Investigation:** If an investigation is required, a dedicated, impartial investigation team will be appointed. Group Compliance will take the lead to govern the process in cooperation with the relevant internal stakeholders (e.g., HR, IT, Internal Audit, HSE...etc.).
4. **Action:** Based on the findings, appropriate corrective, disciplinary, or legal action will be taken.
5. **Feedback:** The Whistleblower will be informed of the general outcome of the investigation, subject to legal and confidentiality constraints, to the extent possible.
6. **Invalidation Process:** If the case lacks information or supporting evidence, Group Compliance will formally request further documentation. **Failure to provide the requested information within a service level agreement of two (2) working days** will result in the allegation being formally closed as invalid.

## 4.3 Case Resolution and Confidentiality

The assigned team will resolve all investigations by implementing necessary **disciplinary actions and mitigation measures** in coordination with the relevant internal authority or executive.

- **Status Update:** Once the case is fully addressed, Group Compliance will update the Online Portal status to "Closed," along with a general summary of the actions taken (if appropriate).
- **Confidentiality Mandate:** To protect the privacy and confidentiality of all parties involved, **no details of the investigation or disciplinary actions taken will be shared with the whistleblower.**

## 5 RESPONSIBILITY OF GROUP COMPLIANCE

Group Compliance is accountable for establishing and maintaining effective mechanisms to facilitate the reporting of any misconduct or policy violations. It shall ensure that all approved reporting channels are accessible to internal and external stakeholders and that information regarding these channels is clearly communicated across the organization.

Group Compliance will provide guidance on raising concerns, overseeing the integrity and effectiveness of the reporting process, and ensuring this Policy remains accurate, current, and fully aligned with applicable laws and company standards.

## 6 RESPONSIBILITIES OF WHISTLEBLOWER

All employees and third parties “Whistleblowers” must recognize their responsibility in preventing and eliminating any action, behavior, or situation that does not comply with EE’s values, policies, or applicable laws and regulations. EE acknowledges the vital role of all employees in maintaining the highest standards of ethics, honesty, and transparency across its operations.

All “Whistleblowers” are required to promptly disclose any information or concern related to potential misconduct or violations when they become aware of it and to do so through the approved reporting channels.

EE values all concerns reported in good faith and with genuine intention, and such disclosures will be treated with fairness, confidentiality, and respect.

### 7 TRAINING

Group Compliance shall initiate and maintain comprehensive awareness campaigns to actively promote the Whistleblowing Policy.

### 8 POLICY OWNER

Group Compliance is the owner of this policy.  
 Questions and feedback regarding this policy must be submitted to Group Compliance: [compliance-int@elsewedy.com](mailto:compliance-int@elsewedy.com)

### 9 POLICY REVIEW

This policy shall be reviewed annually and/or when deemed necessary.

### 10 VERSION CONTROL

Title of document	Group Whistleblowing Policy	
Version Control	Nov/2024	Policy Draft
	07/Dec/2025	1. Policy template alignment. 2. Minor updates to the content, definitions and reportable conduct.
Document Drafted by	Group Compliance	
Document approved by	Group CEO and Group CLCO	
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