




# WHISTLE BLOWING POLICY

QF-1300-MN-002

Revision 2

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Date	08 APR 2026	08/04/2026

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### Document Authorisation

Document Authority / Owner	Document Controller / Custodian
Internal Audit Manager	QA Document Controller
Is overall responsible for the content, quality, adequacy, and continuing applicability of this document.	Is responsible for maintaining updated versions of this document in WOQOD intranet and deleting the previous versions.

### Revision Record

Rev No.	Effectivity Date	Reason for Revision / Description of Changes	Custodian/ Prepared	Reviewed	Endorsed	Approved
0	01 March 2019	First Issue	Internal Audit Coordinator	Legal Affairs Manager	Chief Executive Officer	Board Audit Committee
1	11 April 2022	<ul style="list-style-type: none"> <li>Replaced old document number QF-1100-MN-002</li> <li>Due for revision (3 years)</li> <li>Transferred to the new document template / full revision</li> </ul>	Head – Financial Audits	Internal Audit Manager	MD & CEO	Chairman BAC
2	14 April 2026	<ul style="list-style-type: none"> <li>Replaced old document no. QF-1300-MN-002</li> <li>Revised to align with IMS document requirements</li> <li>Document title updated from policy and procedure manual to Policy</li> <li>Section 1.3 &amp; 1.4, 2 and 4</li> </ul>	Financial Audit Head	Internal Audit Manager	MD & CEO	Chairman BAC

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Deviations and deferments from the requirements specified in this document are permitted only if approved in writing by the Document Authority. Any such deviations and deferments shall be approved for only a limited and specified time and shall be supported by a risk assessment and control.

Before making reference to this document, it is the user's responsibility to ensure that the version used (hard or electronic copy) is current.

#### Review Cycle

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"Effectivity date shall be as per the date this document is signed and approved.

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## SECTION 1 INTRODUCTION

A whistleblowing policy is a formal mechanism that enables employees and other stakeholders to report unethical, illegal, or improper conduct within an organization. It plays a pivotal role in corporate governance by fostering transparency, accountability, and ethical behaviour.

### 1.1 PURPOSE

This manual is designed to explain and facilitate to create an awareness and importance of whistle blowing and handling of whistle blowing incidents to the benefits of WOQOD and its subsidiaries, its stakeholders, to the State of Qatar and the Qatari Society.

WOQOD's reputation for honesty reflects in the way it conducts business with utmost transparency and responsibility. It also reflects in the integrity of WOQOD's financial reporting and its commitment to Environmental, Social and Governance (ESG).

The whistle blowing policy intends to encourage the employees / public / entities to report concerns / wrongdoings / misconduct without inhibitions or fear of retribution / retaliation. It is in the best interest of the Company, State of Qatar and Qatari Society that such concerns / wrongdoings / misconduct be reported so that they can be appropriately addressed.

The whistle blowing system provides a platform to the employees / public / entities for reporting any concerns / wrongdoing / misconduct.

Employees, entities, stake holders and the public are encouraged to use this channel for its intended purposes to preserve its sanctity.

### 1.2 SCOPE

The whistle blowing policy applies to all employees, stakeholders and public in general. This includes the responsibility to report concerns / misconduct through the reporting channels mentioned in section 3.1 and the protection to the reporting person / entity against retribution / retaliation.

### 1.3 TECHNICAL BASIS

*Not Applicable*

### 1.4 LEGAL & OTHER REQUIREMENTS

*For a robust governance framework, WOQOD Board of Directors has introduced the Policy to promote ethical practices in WOQOD. The Board and internal audit team take responsibility for ensuring the effectiveness of whistleblowing mechanisms.*



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## 1.5 GLOSSARY OF TERMS

Term	Definition
BAC	Board Audit Committee
MD&CEO	Managing Director & Chief Executive Officer
Risk Rating - High	The consequences are severe, such as major financial loss, legal or regulatory penalties etc. root cause to be identified and effective control mechanisms introduced immediately
Risk Rating - Medium	The consequences are manageable, such as minor financial loss, minor governance issues etc. and to strengthen the internal control process.
Risk Rating - Low	The consequences are negligible, and effective controls should be put in place

## SECTION 2 POLICY REQUIREMENTS

### 2.1 WOQOD'S WHISTLE BLOWING POLICY

To stand by its reputation for honesty, WOQOD created this whistle blowing policy as a medium / platform for employees, stakeholders and the public in general to report any concern/wrongdoing / misconduct, which may negatively impact the integrity of WOQOD or may jeopardize the interest of the company, State of Qatar or the public.

### 2.2 EXAMPLES OF CONCERNS / WRONG DOINGS / MISCONDUCT

Concerns / Wrongdoing / Misconduct could include the following:

- **SUSPECTED FRAUDULENT ACTIVITIES** – Examples are theft, pilferage, defalcation, corrupt practices, giving or receiving bribes or other benefits to influence, market manipulation, insider trading, violence, life threatening acts, any malicious or dangerous act intent to cause damage to property / reputation / public etc.
- **FINANCIAL REPORTING WRONG DOINGS** – Examples are falsification or destruction of business or financial / accounting records, misrepresentation or suppression of financial information, non-adherence to financial and accounting policies / controls, non-adherence to regulatory compliance, suppression of information etc.
- **VIOLATION OF LAWS, REGULATIONS, COMPANY POLICY AND PROCEDURES** – Examples are violations of governing laws, regulations, non-compliance or non-adherence to company Policy and Procedures, conflict of interest Policy, indulging in deceptive sales



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*practices, manipulation of prices, compromising the quality of product or services, selling spurious or substandard goods etc.*

- **INFORMATION, DATA, SECURITY BREACHES** – Examples are leakage of information, unauthorized disclosure of confidential information, compromising the integrity of data, overlooking cyber threats, undermining cybercrimes, violation of privacy laws, noncompliance to IT policies / controls, sabotage etc.

## SECTION 3 WHISTLE BLOWING MECHANISM

### 3.1 REPORTING CHANNEL

To maintain strict confidentiality, the management has created a special and confidential email. The email id is:

[shareandcare@woqod.com.qa](mailto:shareandcare@woqod.com.qa)

Employees, stakeholders, public are encouraged to report any concern / wrongdoing/misconduct by writing an email to the aforementioned email id. All concerns reported through this channel will be investigated, with strict confidentiality. The reporting person / entity can be rest assured that his / her identity will not be revealed, and protection accorded against any retribution / retaliation.

### 3.2 RECIPIENTS OF THE SPECIAL EMAIL

Emails sent to '[shareandcare@woqod.com.qa](mailto:shareandcare@woqod.com.qa)' will be delivered to the official email boxes of:

- Internal Audit Manager and
- The Chairman of the Board

### 3.3 INVESTIGATION AND CLOSURE OF CONCERNS / WRONG DOINGS / MISCONDUCT

- 3.3.1 Once an email received by 'shareandcare', it will be evaluated for the concern raised in the email for its gravity and consequences.
- 3.3.2 Adequate and appropriate investigations will be conducted, and the results of the investigations will be submitted to the Board Audit Committee, the Chairman of the Board through a Closure Report.
- 3.3.3 Necessary actions will be initiated as directed by the Board Audit Committee and or The Chairman and or MD&CEO.
- 3.3.4 Wherever required, an acknowledgment mail will be sent to the whistle-blower who sent email to 'shareandcare' for the commitment showed.



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### 3.4 PROTECTION FROM RETRIBUTION / RETALIATION

The Board of Directors ensures protection to any employee / public / entity who reports concerns / wrong doings / misconduct in the interest of the Company, State of Qatar or in the interest of the public, from any kind of retribution / retaliation.

Any type of retaliation or persecution of a person / entity who reported a concern / wrongdoing / misconduct will not be tolerated

### SECTION 4 RELATED DOCUMENTS

- *Whistle Blowing Emails*
- *Preliminary Assessment Reports*
- *Closure Reports*