

Whistleblower Policy

Al Sharqi Shipping Co LLC

PURPOSE

At Al Sharqi Shipping Co. LLC, we are committed to conducting our logistics operations with the highest level of integrity and professionalism. This Whistleblower Policy ensures that all employees, contractors, and business partners have a safe, confidential, and effective means to report any concerns related to unethical behavior, violations of company policies, or any illegal activities that could negatively impact the company or its stakeholders.

We are dedicated to transparency and fostering a culture where every individual in the company feels confident reporting concerns. By upholding this policy, we maintain accountability in our logistics operations, ensuring compliance with UAE laws and industry best practices. This includes adherence to the UAE Penal Code, Federal Decree Law No. (20) of 2018 on Anti-Money Laundering, the UAE Labour Law (Federal Decree-Law No. 33 of 2021), and the UAE Personal Data Protection Law (Federal Decree-Law No. 45 of 2021).

We expect every employee, in every position, to apply and follow these rules.

DEFINITION

Whistleblowing refers to the act of reporting any behavior or activity within Al Sharqi Shipping Co. LLC that is unethical, illegal, or contrary to company policy. This includes, but is not limited to:

- Violations of company policies, including operational, safety, ethical, or regulatory guidelines
- Fraud, theft, or financial misconduct
- Health, safety, and environmental violations
- Discriminatory practices or harassment
- Actions that jeopardize the company's reputation or compliance with regulations governing the logistics industry

Whistleblowers play a vital role in ensuring the integrity of our operations and in holding everyone within the company to the highest standards.

REPORTING

How to Report:

We encourage all employees and business partners to report any concerns, whether they involve ethical violations, misconduct, or potential legal violations. Concerns can be reported through the following channels:

- **Whistleblower Officer:** Confidential and impartial handling of the concern
- **Confidential Reporting Line:** Email: whistleblower@alsharqi.co
- **Anonymous and Multilingual Reporting:** Reports may be submitted anonymously, and support is available in multiple languages via secure channels

What to Report:

Reports should include as much detail as possible regarding the nature of the issue, dates, individuals involved, and any relevant documents or evidence to support the concern.

Confidentiality:

All reports will be treated with the utmost confidentiality. We are committed to ensuring that whistleblowers' identities are protected unless required by law or investigation procedures.

PROTECTION

Protection Against Retaliation:

Al Sharqi Shipping Co. LLC maintains a strict zero-tolerance policy toward any form of retaliation against individuals who report concerns in good faith. This includes protection from termination, demotion, harassment, or any other form of adverse treatment.

Support for Whistleblowers:

We will provide full support and guidance to any whistleblower who raises a concern in good faith.

Anonymous Reporting:

Whistleblowers who choose to remain anonymous will have their identity protected to the greatest extent possible under applicable laws.

INVESTIGATION & RESOLUTION

Initial Review:

The Whistleblower Officer will acknowledge receipt of the concern within **one (1) week** and will promptly assess its credibility.

Investigation Process:

Investigations will be thorough, impartial, and confidential, and may involve internal auditors, legal counsel, or third-party experts as needed.

Scope:

Investigations will address any suspected violations of company policy, legal obligations, or industry regulations.

Transparency:

Relevant stakeholders will receive updates throughout the process. Final findings will be documented and shared as appropriate.

Decision-Making Process:

Following investigation, outcomes will be reviewed by designated personnel. Decisions will consider severity, impact, and compliance obligations.

Corrective Actions May Include:

- Disciplinary action
- Operational or procedural changes
- Referral to regulatory or legal authorities

Feedback to Whistleblowers:

Upon resolution, whistleblowers will be informed of the outcome where possible. A resolution is targeted within **forty-five (45) days** of receipt. Whistleblowers may escalate concerns if the response is deemed unsatisfactory.

ADDITIONAL CONSIDERATIONS

Mandatory Training:

All employees, contractors, and partners will receive training on this policy **annually and during onboarding**. Training will be delivered via workshops and through regular internal communication campaigns. It includes guidance on reporting mechanisms and the company's Anti-Bribery and Corruption Policy.

External Reporting:

If a concern remains unresolved internally, it may be escalated to relevant UAE authorities such as the Ministry of Human Resources and Emiratisation (MOHRE), the UAE Financial Intelligence Unit (FIU), or other regulatory bodies.

Recordkeeping and Data Retention:


All whistleblower reports and investigation records will be securely stored in compliance with the UAE Personal Data Protection Law. These records will be retained for **five (5) years** and reviewed periodically for legal and procedural compliance.

Policy Review:

This policy is reviewed annually to ensure continued relevance and alignment with evolving laws and best practices. Stakeholder feedback is incorporated during the review cycle.

COMPLIANCE OFFICER CONTACT INFORMATION

Mr. Atif Rafiq

 050 454 8357

 whistleblower@alsharqi.co

This Whistleblower Policy is effective as of December 1st, 2024.

At Al Sharqi Shipping Co. LLC, we uphold a culture of openness, fairness, and accountability. We encourage everyone to report concerns in good faith to help us sustain our commitment to ethical excellence.

