



**TROJAN**  
CONSTRUCTION GROUP

# **WHISTLEBLOWER POLICY**

## Whistleblower Policy

### Introduction

The Whistleblower Policy (the Policy) outlines guidelines of Trojan Construction Group – Sole Proprietorship LLC (TCG) and its subsidiaries (henceforth referred to as the Group) on handling reports from whistleblowers.

### Scope

This Policy applies to TCG, and its subsidiaries that do not have existing related policies suitable to their operations. The Policy applies to all areas of the Group's business operations, covering all directors, executives, and employees working for or on behalf of the Group. It also extends to outsourced or seconded employees working exclusively for or on behalf of the Group. The Policy also applies to its external parties working at its premises. TCG also encourages its external parties to adopt similar whistleblower policies for their own operations.

This Policy is supported by, and should be read in conjunction with, other TCG policies such as, but not limited to: Code of Conduct and Business Ethics Policy, Supplier Code of Conduct, Environmental Policy, Privacy and Data Security Policy, and Human Rights Policy.

### Policy Statement

TCG prohibits wrongdoing, malpractice, or fraudulent activity related to any aspect of the company's operations. This Policy enables the reporting and investigation of wrongdoings, malpractice, or fraudulent activity, while also acting as a deterrent to such practices, and ensures that whistleblowers are protected from retaliatory action.

### *Reporting Violations*

TCG encourages stakeholders to report any known or witnessed wrong doings, malpractice, fraudulent activity, ethical concerns about TCG's operations or conduct, non-compliance of any laws, or violations of TCG's Policy commitments and guidelines by individuals of either internal or external parties. Alpha Dhabi Holding PJSC (henceforth referred to as ADH), the parent company has an anonymous whistleblowing email posted on its website by the Head of Human Resources (HR); [speakup@trojanconstruction.group](mailto:speakup@trojanconstruction.group) that is available to all stakeholders at any time.

### *Confidentiality and Protection from Retaliation*

ADH has put the above measures to promote the fair and equitable review of an issue put forth by a whistleblower. Under the United Arab Emirates (UAE) law, the whistleblower is protected for any concerns raised by them. To maintain the identity of the whistleblower confidential, ADH has limited the hosting of anonymous whistleblowing emails to one individual (Head of HR). ADH prohibits any effort made by individuals to ascertain the identity of the whistleblower.

### *False or Malicious Reports*

ADH encourages that Whistleblowers' reports be made in good faith. HR to screen for any false and malicious reports prior to escalating whistleblower reports to the Audit Committee responsible for investigating them. ADH considers reports not in good faith to be those that are frivolous. ADH does not investigate such reports.

### **Investigation of Reports**

ADH's Audit Committee is currently responsible for investigating reporting violations or alleged violations that may have an impact on ADH. They will assess whistleblower reports made in good faith and take the necessary actions.

### **Stakeholder Engagement**

TCG fosters relationships with stakeholders to better understand whistleblowers' concerns and endeavours to integrate such considerations into this Policy.

### **Training and Awareness**

TCG promotes the training and development of its employees to empower them with the knowledge and skills they need to uphold principles of this Policy. TCG further promotes awareness and an understanding, amongst employees, of how these principles impact its operations and how the company's operations impact stakeholders.

### **Compliance**

TCG complies with the applicable laws and regulations of the UAE and/or the applicable laws and regulations of the host country of its operations. For the avoidance of doubt, subsidiaries registered and operating in countries other than the UAE are mandated to adhere to the laws of the host country in addition to the applicable laws of the UAE. TCG remains unequivocally compliant with UAE laws.

### **Roles and Responsibilities**

The Audit Committee, in conjunction with the Board of Directors at ADH, is responsible for setting the Policy. The Group Governance and Compliance function, under the auspices of the Audit Committee, is responsible for the administration, revision, interpretation, and application of this Policy. All directors, executives, employees, outsourced employees, or seconded employees working for or on behalf of ADH and/or TCG are responsible for upholding principles as set forth in this Policy.

### **Reporting and Transparency**

TCG endeavours to incorporate the number of Whistleblower reports received, types of misconduct, and measures taken in either its annual corporate governance report or annual Environment, Social, and Governance (ESG) report.

### **Policy Review**

TCG will review and revise this Policy periodically if required so that it remains up-to-date and aligned with the company's core values, laws and regulations of the United Arab Emirates (UAE), and with global best practices. TCG shall make available this Policy and future amendments to directors, executives, and employees.

This Policy was last reviewed in April 2024.