

WHISTLEBLOWING POLICY STATEMENT

We are engaged in the design, fabrication, installation of piping, structural, heaters, stacks, heat exchangers, process skids, modules, pressure vessels, repair, servicing of structures, and a wide range of mechanical works including scaffoldings, painting, and anticorrosion services; supply & installation of electrical & instrument works, design and construction of heating, ventilation and air conditioning (HVAC), metal prefabricated buildings manufacturing; management of valve services including sourcing of valves and associated equipment, testing, overhauling, and refurbishment of valves including design, manufacturing, machining, weld overlay and sub-assembly services for valves components in ferrous and non-ferrous materials, for onshore/ offshore oil & gas facilities and marine repair works including refurbishment and conversion at Facilities in Abu Dhabi and at customer locations.

Purpose

In this policy 'Whistleblowing' means the reporting by employees of suspected misconduct, illegal acts, or failure to act within the Company or its site locations. The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the Council's work to come forward and voice those concerns.

In accordance with COMPANY Ethical Values, we seek to always conduct our business honestly and with integrity. However, we acknowledge that all organizations face the risk of their activities going wrong from time to time, or of unknowingly harboring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability within the COMPANY, we believe that we can help prevent such situations from occurring. We expect all staff to maintain high standards in accordance with our code of ethics and to report any wrongdoing that falls short of these fundamental principles. The main purpose of this policy is to give all the opportunity and protection they need to raise a concern/s internally. In almost every case, raising concerns internally will be the most appropriate action for you to take.

Scope

It is the responsibility of all employees to raise any concerns that they might have about malpractice within the workplace. The aim of this policy is to ensure that our workers are confident that they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential. This policy and procedure are voluntary and do not form part of any employee's contract of employment and it may be amended at any time.

This Policy applies to all individuals working for COMPANY at all levels and grades including, members of the Top Management (including permanent and temporary employees), trainees, home workers, agency staff, Subcontractors, external consultants, suppliers, and vendors. (Collectively known as employees in this policy). The Policy is designed to enable all employees to raise concerns internally and at a senior level and to disclose information that the individual believes is malpractice or impropriety within the group. These concerns could include but are not limited to:

- Financial malpractice or impropriety or fraud
- Failure to comply with legal obligations
- Human rights abuses (including dangers to health and safety or the environment).
- Improper conduct or unethical behaviour or Criminal activity
- Significant breaches of the Ethical and associated policies
- Falsification of documents or fraudulent suppliers
- Creating political or specific interest groups within COMPANY that functions against COMPANY policies
- Spreading out confidential information's of COMPANY and spreading out false information's in public against COMPANY
- Attempts to conceal any of the above once they have occurred

Procedures for reporting to Denholm Yam Top Management

Any person wishing to invoke this Policy may send an email (accompanied by supporting evidence, if possible) to: members.whistleblowing@dy.ae or by phone to any member of the Top Management.

The Management has a strong commitment to this Policy means anyone can raise concerns about malpractice and be sure that they will be supported and protected from any repercussions. Provided you have a reasonable belief that malpractice is occurring or is likely to occur, it doesn't matter if you are mistaken. There is no question of you having to prove anything. Employees should not pursue their own investigations, however well-intended, as flawed, or improper investigation could compromise the COMPANY'S ability to take effective remedial or disciplinary action.

Once a concern is reported, COMPANY Management or the responsible Department Head will review and determine the validity of the reported case and will assign its appropriate member to do initial inquiries and carry out an initial assessment of how to proceed. This will be undertaken as quickly as possible, usually within 2 working days. As part of this initial assessment, you may be asked to attend a meeting to explain your concerns. If so, you will be able to bring a colleague with you, and a written summary of your concerns will be provided after the meeting and a disclosure report shall be prepared if the initial assessment justifies the allegation/concern.

Provided there is sufficient evidence to support the allegation/concern, a full investigation will be conducted with the objective of establishing whether malpractice has occurred. Due to the varied nature of issues that may be raised, it is not possible to lay down precise timescales for either internal or external investigations. The investigation will be undertaken as quickly as possible in line with the nature and severity of the allegation/concern without affecting the quality and depth of the investigation. The investigation may need to be carried out under strict terms of confidentiality i.e., not informing the subject of the complaint until (or if) it becomes necessary to do so, for example as in the case of suspected fraud. The complaint may be contacted for further information, but only if the complaint has given express permission for their name and contact details to be disclosed. Your contact will keep you up to date on the outcome of any inquiries and investigations carried out and any actions are taken, where it does not impact the COMPANY'S duty of confidentiality to others. If you are unhappy with the response you receive, you may bring it to my attention.

Having raised a concern, the person to whom the disclosure has been made will, unless otherwise advised, act as your point of contact in the matter. They will be responsible for dealing with any instances of victimization arising out of you raising your concern. Should you feel that there is any detriment to you, or your career, because of raising the concern, this should be reported immediately to the person to whom the disclosure was made. If you reasonably believe that you are unable to discuss the detriment with that person you should bring it to my attention.

Dated: 04/07/2022

"Dedication towards excellence is our prime mission"

FERAS MUQATTASH
MANAGING PARTNER