



Whistleblowing Policy Statement

PURPOSE

The purpose of this Whistleblowing policy statement is to provide a clear and transparent process for employees, contractors, and other stakeholders to report any concerns about unethical, illegal, or improper conduct within AD Ports Group. This policy aims to encourage a culture of openness and accountability, ensuring that all reports are handled confidentially and without fear of retaliation.

SCOPE

This policy statement applies to all employees, contractors, suppliers, and other stakeholders associated with AD Ports Group. It covers any concerns related to misconduct, including but not limited to fraud, corruption, harassment, discrimination, safety violations, and any other unethical or illegal activities. The policy ensures that all reports are taken seriously and investigated thoroughly.

POLICY STATEMENT

AD Ports Group is committed to maintaining the highest standards of integrity and ethical behaviour. We encourage all stakeholders to report any concerns about misconduct without fear of retaliation. All reports will be treated confidentially and investigated promptly and fairly.

A. Reporting Mechanisms

- Online Reporting: Reports can be submitted through our secure whistleblowing system.
- Hotline: A toll-free hotline is available for anonymous reporting. The hotline is accessible 24/7 and supports multiple languages.
- Email: Concerns can be reported via email to the designated compliance officer.
- In-Person: Reports can be made in person to a supervisor, manager, or the Human Capital department.

B. Anonymity and Confidentiality

- Reports can be made anonymously if preferred.
- All reports will be treated with the highest level of confidentiality.
- The identity of the whistleblower will be protected in accordance with applicable law and regulation.

C. No Retaliation

- AD Ports Group strictly prohibits any form of retaliation against individuals who report concerns in good faith.
- Any employee found to have retaliated against a whistleblower will face disciplinary action, up to and including termination.

D. Investigation Process

- All reports will be acknowledged within a specified timeframe.
- An initial assessment will be conducted to determine the appropriate course of action.
- Investigations will be conducted promptly, thoroughly, and impartially.
- The whistleblower will be informed of the outcome of the investigation, subject to legal and confidentiality constraints.



E. False Reporting

- Deliberately making false or malicious allegations is prohibited and may result in disciplinary action.

F. Independent Whistleblowing Channels

- AD Ports Group has partnered with an external service provider, to provide a dedicated 24/7 reporting channel for all AD Ports Group's Stakeholders, including directors, employees, contractors, suppliers, and third-party representatives. The external provider responsibility is to securely collect and transmit all concerns reported via the whistleblowing channels and transmitting them to AD Ports Group, while the review, investigation, and resolution of those concerns remain the responsibility of the Chief Risk & Compliance Officer.

The provided channels are:

- o Whistleblowing online portal: <https://adportsgroup.ipm.ae.starcompliance.com>
- o Toll-Free Number: 8000 651 2043
- o Email: rc-reachout@adports.ae

Mohamed Juma Al Shamisi
MD & Group CEO - AD Ports Group