



المتحدة للتنمية
UNITED DEVELOPMENT CO.

INTERNAL AUDIT DEPARTMENT

WHISTLEBLOWING POLICY U-IMS-IA-2002 | REV 0 | 2022 | Extract



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1 PURPOSE

UDC is committed to conduct its business with honesty and integrity and expects its staff to maintain high standards in accordance with its code of conduct & work ethics.

The Whistle Blowing Policy outlines the principles for the reporting of severe breaches of the code and aims to:

- Enhance UDC transparency and strengthen its controls for combating malpractice.
- Encourage staff or an interested party to report suspected irregularities in good faith without fear of victimization or reprisal even if they were proved to be mistaken.
- Provide staff or interested parties with guidance as to how to raise their concerns.

2 SCOPE

The Whistleblowing policy applies to all UDC staff and any entity/person conducting business with UDC and its Subsidiaries.

3 TERMS AND ABBREVIATIONS

| | |
|------------|--|
| UDC | United Development Company |
| Employees | All employees of UDC (including workers in operation and maintenance, civil services, and contract departments). |
| Incident/s | Suspected fraud, corruption, and other serious infringements of the governing regulations. |

4 PROCEDURE

4.1 Reporting Obligations

UDC requires the active support of all interested parties, who are encouraged to report incidents of suspected fraud, corruption, and other serious infringements of the governing regulations.

The Whistleblowing policy does not substitute the Grievance Policy established under UDC HR Policy Manual, yet regulates extremely serious concerns related to the above listed incidents.

Staff have the obligation to cooperate in investigations into such reported incidents. No members of staff or management may use their position to prevent

other members from exercising their rights or complying with their obligations as indicated above.

4.2 Reporting Concern

Staff or other interested party who believe that the Company or any of its employees has engaged in fraudulent or inappropriate acts, is required to directly report the potential violation to the Whistleblowing Officer who is Manager – Internal Audit.

All Whistleblowing disclosures will be treated as confidential, and it is recommended to include detailed information relating to the matter being reported such as dates, involved parties, quantified monetary damages - whenever possible. Provision of details will facilitate a timely review and also enhance the investigation of the case.

Concerns are to be directed to whistleblowing.officer@udcqatar.com . This recipient will swiftly initiate the required procedure.

If the use of the above channel is perceived inappropriate in view of the circumstances (for instance, if there is a conflict of interest or the Manager – Internal Audit is personally implicated in the incidents to be reported, or the Manager – Internal Audit was initially alerted and failed to take appropriate action), the matter may be escalated and reported through whistleblowing.escalation@udcqatar.com; handled by AC. The communication should include on top of the above requirements, a specified reasoning as to why the matter is not directed through Manager – Internal Audit.

4.3 Investigating a Concern

Upon the receipt of the complaint, the recipient will acknowledge the same to the sender and notify the Audit Committee of the concern. An evaluation will be initiated in line with set criteria stipulated under the approved Whistleblowing scorecard in order to elect whether the presented allegations fall under the conditions of the Whistleblowing Policy. The Whistleblowing Officer is required to present his recommendation to the Audit Committee who will decide whether an investigation is warranted or not.

After obtaining the relevant directives, the Whistleblowing Officer shall manage the investigation with extreme diligence and confidentiality and report the progress on a timely basis to the Audit Committee. A final report is to be elevated to the Audit Committee once a review is completed.



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For the cases that were deemed not falling under the Whistleblowing Policy, the Whistleblowing Officer may get back to the party that raised the concern (whenever applicable) and advise about other channels available for attending the raised concern (such as the escalation to the Directorate Management or through the Grievance Procedure as stipulated in the HR Policy Manual). It is the responsibility of the party that raised the concern to contact the other channels and initiate their grievance.

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