

## Whistleblowing Policy Statement

### Objectives & Applicability:

AlAwwal Invest Company (SAB Invest) has the Whistleblowing Policy in compliance with the local regulatory requirements and international best practice on the subject in order to:

- Define the use of dedicated Whistleblowing channels and protocols that promote consistent reporting, investigation, oversight, controls, and governance.
- Establish a unified Whistleblowing approach to cover all business lines, functions and entities.
- Prevent and/or mitigate risks such as Regulatory Compliance Risk, Financial Crime Compliance Risk and Reputational Risk, among others.
- Ensure SAB Invest Individuals are aware of procedures to be followed if they want to raise, or if they receive, a concern through Whistleblowing channels.
- Promote a culture of openness and transparency by enabling SAB Invest Individuals and Stakeholders to report concerns and/or violations in a safe and confidential manner.
- Define the adequate governance and management oversight of Whistleblowing arrangements, independence of investigations and follow-up of actions arising from such Whistleblowing investigations.

The term **SAB Invest** Individual(s) are defined as employees, members of the Board and/or Board Committees, secondees, external consultants, contractors, agency employees including those who are working through a third party contract such as an outsource company or someone who is offering their personal service (a freelancer).

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All SAB Invest Individuals are encouraged to escalate issues related to Compliance, Conduct and Malpractice, or where an event could lead to a regulatory fine or investigation. SAB Invest Individuals may raise concerns in confidence through Whistleblowing channels if they feel they cannot use their normal reporting lines and escalation routes.

Any concern that qualifies as Whistleblowing, as defined in this Policy, must not be discussed outside of the official channels and must be reported through Speak Up channels to allow confidential investigation, governance and reporting as per the established Policy. Whistleblowing concerns may be reported directly to Supervisory Authorities or relevant agencies instead of, or alongside, being reported through Speak Up. Nothing in any contract, agreement or policy may restrict or purport to restrict a SAB Invest Individual, or Stakeholder, from raising a Whistleblowing concern, either internally at the company or to Supervisory Authorities or relevant agencies.

SAB Invest, under no circumstance, tolerates Retaliation. The Company shall implement and oversee mechanisms through which SAB Invest Individuals and Stakeholders feel safe to raise concerns in confidence. For cases reported by or against the members of the Board/ Board Committees, the Chief Compliance Officer will have the authority to perform the thorough investigation in consultation with the Company Secretary, where applicable.

### **Whistleblowing Channels**

SAB Invest Official Whistleblowing channel is Speak Up which is accessible internally and external via email, phone and website to confidentially raise all concerns.