

Speak Up Policy

Concerned about possible wrongdoing? For example:

I have serious concerns about safety at my site	This gift seems inappropriate and costs more than OMR 20
I have serious concerns about staff welfare	I suspect misuse of Company funds
I was asked to report hours that I did not work	I suspect theft of Company property at my site

How do I Speak Up? Who do I report to?

You can report to your Site Manager or HSE Manager

Contact nos: Lekhwair

You can call 2428 9922 or 9757 5970 ask for the Operation Manager (Mr. Rajneesh Mathur)

You can send an email to info@sjabedalsulaimi.com (you can choose to be anonymous)

You can either call or send an email to the following Key Personnel of the Company:

Name	Designation	Email	Tel No.
Joseph J. Abed	Director	Joseph.Abed@sjabedalsulaimi.com	-
Toni Khoury	General Manager	Toni.Khoury@sjabedalsulaimi.com	9700 3607
Rajneesh Mathur	Operation Manager	Rajneesh.Mathur@sjabedalsulaimi.com	9757 5970
Manoj Devsi	HSE Manager	Manoj.Bhamaniya@sjabedalsulaimi.com	9213 0304
Saleh Sukry	Contract Manager	Saleh.suqry@sjabedalsulaimi.com	-
Maqbool Balushi	HR	HR.sjabedalsulaimi.com	9644 1677

Introduction

S.J. Abed is committed to supporting all persons, including current, potential, and former employees, independent contractors, customers, and suppliers in coming forward with any genuine concerns of wrongdoing within S.J. Abed. This Speak Up Policy (the "Policy") forms part of this commitment.

If a person has a genuine concern of possible wrongdoing relevant to S.J. Abed Code of Business Conduct, inappropriate or illegal behavior, or violations of local laws (generally referred to as a "Reportable Concern"), they should report it under this Policy. They should "Speak Up".

Examples of Reportable Concerns for the purpose of this Policy are genuine concerns relating to any of the following:

Welfare: any issues or concerns regarding staff welfare including salary payment, accommodation, food, medical, transport, leave and personal domestic problems

Legal Obligations: failure to comply with any legal obligations (examples include concerns relating to public procurement, consumer protection, financial or non-financial reporting/recordkeeping)

Health & Safety breaches: any health, safety, or environmental concern (examples include transport safety, protection of the environment, public health, product safety and compliance)

Criminal Offences: any criminal offence (examples include fraud, theft, antitrust/competition violations, bribery and corruption)

Security breaches: any threat to the protection of personal data, security of network and information systems, inviting and/or entertaining unauthorized visitors inside Company facilities

Unethical behaviors: any violation of the S.J. Abed Code of Business Conduct

Practices causing harm to S.J. Abed or its people: Any violation of a S.J. Abed policy that could cause harm to Company image, reputation, assets and/or its people, suppliers, clients or partners; and

Retaliation: any fear or concerns of retaliation for Speaking Up

Our Speak Up Policy

S.J. Abed is committed to:

- Ensuring that anyone with a Reportable Concern has sufficient channels through which to Speak Up in a secure and confidential manner and, if they wish, anonymously
- Identifying competent persons to investigate Speak Up Reports objectively
- Following-up with Speak Up Reporters as appropriate regarding the status of investigation into their Reportable Concern
- Treating all parties involved in a Speak Up Report investigation fairly and respectfully
- Treating Speak Up Reports and investigations with the highest level of confidentiality, as appropriate to the circumstances
- Evaluating the facts established by a Speak Up investigation to determine what, if any, remediation and/or disciplinary action should be considered
- Taking all reasonable steps to protect a Speak Up Reporter and applying a zero-tolerance approach to any retaliation for raising a Reportable Concern in accordance with local laws (note that this does not protect a Speak Up Reporter from any disciplinary action that may be warranted due to their own actions)
- Protecting, as far as possible, sensitive Company and personal information that may be disclosed while making a Speak Up Report or in the investigation process, any form of retaliation for Speaking Up is a breach of this Policy and S.J. Abed Code of Business Conduct and will be addressed with disciplinary action. Speak Up Reporters will not be punished or suffer any adverse treatment for raising a genuine concern of wrongdoing. However, submitting a knowingly false Speak Up Report will not be tolerated

and S.J. Abed may take disciplinary action in accordance with local law. Any criminal conduct will be reported to local law enforcement agencies.

Roles and Responsibilities of All Employees:

- Speak Up if they have a Reportable Concern
- Read and understand this Policy
- Rest assured there will be no retaliation nor consequences to your job for reporting a genuine concern

Roles and Responsibilities of Management:

- Lead with integrity and reinforce S.J. Abed values
- Embed a Speak Up culture and create an environment where employees feel comfortable & safe Speaking Up to Management
- Ensure Speak Up posters are displayed at all premises
- Enforce & Oversee the Speak Up Policy
- Ensure that each All Speak Up Reports received by employees through all channels are investigated by a competent and impartial person ("Speak Up Investigator") and that appropriate action is taken
- Keep the identities of Reporters confidential where practical
- Enforce proper anti-retaliation policies in accordance with local law
- Take disciplinary action as may be appropriate in the event of retaliation

Roles and Responsibilities of Speak Up Investigators:

- Conduct impartial investigations of all Speak Up Reports that are assigned to them under this Policy
- Keep the identities of Reporters confidential where practical
- Participate in Speak Up Investigation training
- Along with Management, take necessary measures to enforce proper anti-retaliation policies in accordance with local laws

Joseph J. Abed
Director

Date: 03-11-2024