

Whistleblowing Policy

July 2025

GAC Group (**GAC**) is committed to maintaining the highest ethical standards in its operations.

We recognise the importance of a transparent and responsible reporting system to uphold these standards. We encourage employees and others to report concerns regarding any wrongdoing or unethical conduct without fear of retaliation. Anyone who raises a concern will be supported throughout the process and their concerns will be taken seriously, investigated appropriately and acted upon as necessary.

WHO AND WHAT IS COVERED BY THE POLICY?

All individuals working at all levels for or with GAC, including but not limited to directors, senior managers, officers, employees, consultants, contractors, customers, trainees, homeworkers, part-time and fixed-term workers, casual and agency employees and other stakeholders associated with GAC (individually referred to as a '**Whistleblower**' and collectively referred to as '**Whistleblowers**') are covered by the Whistleblowing Policy (the Policy).

The Policy covers any concerns relating to illegal, unethical or improper conduct, including but not limited to:

1. fraud, corruption or financial misconduct;
2. breaches of laws, regulations or GAC policies;
3. health and safety violations;
4. environmental harm or non-compliance;
5. discrimination, harassment or victimisation;
6. misuse of GAC's resources or assets; and/or
7. any activity that could harm GAC's reputation or integrity.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the act of reporting, disclosing or exposing information about illegal, unethical or harmful activities that have occurred or are occurring within an organisation.

A Whistleblower is an individual who reports or discloses information about illegal, unethical or improper activities within an organisation. Whistleblowers play a crucial role in promoting transparency and accountability by raising concerns that might otherwise go unnoticed.

The Policy should not be used for complaints relating to your own personal grievances, such as the way you have been treated at work. In those cases, please refer to the dedicated grievance process as communicated by the GAC company you are employed by.

If you are uncertain as to whether a concern is within the scope of the Policy, you should seek advice from the Compliance Team via email at groupcompliance@gac.com. Alternatively, you can submit your concern to the dedicated whistleblowing email address at whistleblowing@gac.com, or via the below alternative methods.

HOW TO REPORT A CONCERN

Any concern should initially be reported to your line manager, as they may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Compliance Team.

In the instance you do not wish to report your concern to your line manager, the following channels can be used instead. You may:

- contact GAC's confidential whistleblowing hotline at +971 (0)4 815 0810, where you can leave
- a voicemail detailing your concern;
- email the dedicated whistleblowing email address at whistleblowing@gac.com;
- raise a concern by clicking the 'Raise A Concern' link located at the bottom of the GAC website homepage; or
- write a letter to the Group Compliance Manager at GAC Corporate Headquarters, Gate 4, Jebel Ali Free Zone, Jebel Ali, Dubai, P.O. Box 18006, United Arab Emirates.

These communication methods are monitored by the Group Compliance Manager and are designed to maintain confidentiality.

When reporting a concern it would be beneficial, but not mandatory, to include the following information to assist in the investigation:

Personal Information

- name (if you do not wish to report anonymously);
- contact information (email, phone number); and
- GAC company, job title and department (if relevant).

Date and Time

- when the incident or issue occurred or was observed.

Details of the Incident

- a clear description of the wrongdoing or unethical behaviour; and
- what happened, how it happened and who was involved.

Evidence

- any documents, emails or files that support the concern.

Impact of the Incident

- how the behaviour or actions affected GAC, employees, clients or others; and
- whether the wrongdoing caused financial loss, harm to individuals or reputational damage.

Previous Actions Taken

- whether you have already reported the issue to someone (line manager, Human Resources, etc.); and
- if so, describe the response or action taken by the person you reported it to.

CONFIDENTIALITY

Whistleblowers may report their concerns anonymously. However, providing contact details may allow for follow-up clarifications and assistance in resolving the issue.

It is GAC's intention that employees feel able to voice whistleblowing concerns openly. If you want to raise your concern confidentially, all efforts will be made to keep your identity a secret and to handle your concern with discretion.

INVESTIGATION PROCESS

GAC is committed to conducting an investigation in a timely, objective and thorough manner.

Upon receiving a concern, the Group Compliance Manager will acknowledge receipt of the concern(s) within (5) five working days.

The Group Compliance Manager will initiate a thorough and impartial investigation into the reported issue. Depending on the nature of the concern, the investigation may involve internal or external resources.

All reports will be handled confidentially to the fullest extent possible. The identity of the Whistleblower will only be disclosed if required by law or as part of the investigation process.

Whistleblowers will be kept informed of the investigation's progress and outcome, where appropriate. If the report leads to disciplinary action or other corrective measures, the Whistleblower may not always be informed of the specific actions taken due to confidentiality considerations. You should treat any information about the investigation as confidential.

If it is concluded that a Whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the Whistleblower may be subject to disciplinary action.

IF YOU ARE NOT SATISFIED

The outcome you are seeking cannot always be guaranteed. It should be noted however, that your concern will be dealt with fairly and in an appropriate manner. By following this Policy, you can help us to achieve this.

If you are not satisfied with the manner in which your concern has been handled, you may contact the Group President via whistleblowing@gac.com.

PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

GAC is committed to protecting whistleblowers from retaliation. Retaliation includes any adverse action such as dismissal, demotion, harassment, discrimination or any other form of unfair treatment.

Employees found to be retaliating against a Whistleblower will face disciplinary action, up to and including termination.

In addition to the protection provided under this Policy, Whistleblowers may also be entitled to protection under relevant national or local laws including labour laws and anti-retaliation laws. Whistleblowers who feel they have been subjected to retaliation may speak to the Compliance Team via one of the communication methods in the Policy, file a complaint with your appropriate regulatory authority or seek legal advice.

Openness is encouraged and employees who raise genuine concerns in good faith under this Policy will be supported, even in the event that they turn out to be mistaken.

Pontus Fredriksson
Group President
July 2025