



Whistleblower Policy

Doc No: EEC-28082022

Rev No: V1.2

Issue Date: Aug 2022

Revised Date: 2 Mar 2023

Purpose

The policy is designed to provide avenues for you to raise concerns internally and at a high level regarding alleged improper conduct, fraud or corruption and ensure that all allegations are thoroughly investigated, and appropriate action is taken where necessary. This policy is intended to provide reassurance that you will be protected from reprisals or victimisation if you have a reasonable belief in the concern and have raised the matter in good faith.

Core Value #1 Trust encourages you to confront the brutal facts and use mechanisms to prevent and detect improper conduct, fraud and corruption. Matters of this kind are taken seriously by Elite, and the Executive Management has endorsed this whistleblowing policy. This policy provides an early warning system and a clear framework for constructive problem-solving.

Scope And Eligibility

This policy applies to all employees, including contractors and temporary contracts.

Responsibilities

All individuals to whom this policy applies are responsible for becoming familiar with and following this policy. Line Managers are responsible for promoting the understanding of this policy and for taking appropriate steps to help ensure compliance with it.

Concerns Covered by Whistleblowing Policy

This policy is intended to cover concerns such as:

- fraud and corruption
- conduct which is an offence or a breach of law (including crimes and negligence)
- intentional deception to obtain an unjust or illegal advantage (including financial gain), either for the company or personally
- failure to comply with any legal obligations or regulatory requirements
- danger to health and safety
- damage to the environment
- unauthorised use of company funds or assets
- a serious breach of fundamental internal delegations or authorities
- malpractice, serious non-professional or serious non-ethical behaviour
- potential conflict of interest that were not declared
- the deliberate concealment of information tending to show any of the matters listed above.

Confidentiality

All concerns will be treated in confidence, and every effort will be made not to reveal the whistleblower's identity if requested. It may be, however, that confidentiality is not always possible to maintain due to the type of investigation. You should not disclose confidential information to anyone else once you raise your concerns.

Anonymous Allegations

This policy encourages you to put your name on your report whenever possible. If you don't tell us who you are, it will be much more difficult for us to protect your position or to give you feedback. Concerns expressed anonymously are much less powerful, but they may be considered at the management's discretion.



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Safeguards And Victimisation

Elite will take appropriate action and protect you against reprisal, harassment, discrimination or adverse employment actions (discharge, demotion, suspension) where you have raised a concern to the appropriate person in good faith and the reasonable belief that it tends to show improper conduct, fraud or corruption. You are protected even if the allegations prove to be incorrect or unsubstantiated. However, if you maliciously file a false report of wrongdoing with baseless allegations or for personal gain, appropriate disciplinary action may be taken.

Employees who participate or assist in an investigation will also be protected.

If you believe you are being retaliated against, you must contact Internal Audit / Compliance immediately.

Please note that other procedures are available to you, e.g. the Grievance procedure (which can be found on the [EliteNet](#)), which can be used for your complaints about your employment.

Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. It would help if you raised concerns with Internal Audit / Compliance directly (compliance@elite-co.com).

Procedures For Making a Disclosure

1. You may raise your concern by telephone, in person or writing. The sooner you express your concern, the easier it is to take action. You will need to provide the following information:
 - the nature of your concern and why you believe it to be true
 - the background history of the concern (dates, pieces of evidence, etc.)

Although you are not expected to prove beyond doubt the truth of your suspicion, you have to demonstrate a genuine concern relating to the suspected wrongdoing or that there are reasonable grounds for your concern.

2. Internal Audit / Compliance will respond to your concern as quickly as possible.
3. Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should be.
4. Where appropriate, the matters raised may be:
 - investigated by management or HR through the disciplinary/grievance process
 - referred to the police or relevant authorities
 - referred to the external auditor
 - referred to an independent committee (Whistleblower Committee) for further investigation. This committee will be formed on an ad hoc basis.

If necessary, the Internal Audit / Compliance shall be entitled to raise the concerns to the Executive Management Board at a confidential session. It shall have the discretion to require that any member of the board or the executive staff be absent from the meeting if that person may have or been perceived as having a conflict of interest in the concern.

5. Once a conclusion is reached, you'll be notified by Internal Audit / Compliance.

All claims made will be investigated fairly and impartially.

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Reward Scheme specific for reporting violation on our vehicle use policy

We at Elite believe in maintaining the highest ethical conduct and transparency standards. As part of this commitment, we encourage you to report any malpractices or misconduct that may be taking place in the organisation.

In line with this, we would like to remind all employees to be vigilant and report any suspected wrongdoings they may observe. This includes reporting any concerns about the behaviour of our drivers, which is of utmost importance to our customers' safety and satisfaction.

To incentivise you to speak up, we are pleased to announce that any employee who reports wrongdoing and has been proven to be correct will receive a reward after an investigation. The reward will be paid through the payroll system, and the amount will be AED 500.

To claim the reward, employees must use the whistleblower form (link below) or report to the Fleet Manager via Whatsapp with evidence, who will initiate the investigation process.

Hotline: +971 4 2205007 ext. 777

[Anonymous Online Form](#)

Email: compliance@elite-co.com