



TROJAN
CONSTRUCTION GROUP

WHISTLEBLOWER POLICY

Whistleblower Policy

Introduction

The Whistleblower Policy (the Policy) outlines guidelines of Trojan Construction Group – Sole Proprietorship LLC (TCG) and its subsidiaries (henceforth referred to as the Group) on handling reports from whistleblowers.

Scope

This Policy applies to TCG, and its subsidiaries that do not have existing related policies suitable to their operations. The Policy applies to all areas of the Group's business operations, covering all directors, executives, and employees working for or on behalf of the Group. It also extends to outsourced or seconded employees working exclusively for or on behalf of the Group. The Policy also applies to its external parties working at its premises. TCG also encourages its external parties to adopt similar whistleblower policies for their own operations.

This Policy is supported by, and should be read in conjunction with, other TCG policies such as, but not limited to: Code of Conduct and Business Ethics Policy, Supplier Code of Conduct, Environmental Policy, Privacy and Data Security Policy, and Human Rights Policy.

Policy Statement

TCG prohibits wrongdoing, malpractice, or fraudulent activity related to any aspect of the company's operations. This Policy enables the reporting and investigation of wrongdoings, malpractice, or fraudulent activity, while also acting as a deterrent to such practices, and ensures that whistleblowers are protected from retaliatory action.

Reporting Violations

TCG encourages stakeholders to report any known or witnessed wrong doings, malpractice, fraudulent activity, ethical concerns about TCG's operations or conduct, non-compliance of any laws, or violations of TCG's Policy commitments and guidelines by individuals of either internal or external parties. TCG has an anonymous whistleblowing email posted on its website speakup@trojanconstruction.group that is available to all stakeholders at any time.

Confidentiality and Protection from Retaliation

TCG has put the above measures to promote the fair and equitable review of an issue put forth by a whistleblower. Under the United Arab Emirates (UAE) law, the whistleblower is protected for any concerns raised by them. To maintain the identity of the whistleblower confidential, TCG has limited the hosting of anonymous whistleblowing emails to one individual (Compliance officer). TCG prohibits any effort made by individuals to ascertain the identity of the whistleblower.

False or Malicious Reports

TCG encourages that Whistleblowers' reports be made in good faith. Compliance officer to screen for any false and malicious reports prior to escalating whistleblower reports to the committee responsible for investigating them. TCG considers reports not in good faith to be those that are frivolous. TCG does not investigate such reports.

Investigation of Reports

A management committee established by the compliance officer will (depending on the amount and extent in question) determine the responsible authority for investigating reporting violations or alleged violations. They will assess whistleblower reports made in good faith and take the necessary actions.

Stakeholder Engagement

TCG fosters relationships with stakeholders to better understand whistleblowers' concerns and endeavours to integrate such considerations into this Policy.

Training and Awareness

TCG promotes the training and development of its employees to empower them with the knowledge and skills they need to uphold principles of this Policy. TCG further promotes awareness and an understanding, amongst employees, of how these principles impact its operations and how the company's operations impact stakeholders.

Compliance

TCG complies with the applicable laws and regulations of the UAE and/or the applicable laws and regulations of the host country of its operations. For the avoidance of doubt, subsidiaries registered and operating in countries other than the UAE are mandated to adhere to the laws of the host country in addition to the applicable laws of the UAE. TCG remains unequivocally compliant with UAE laws.

Roles and Responsibilities

The Group Management Director and the CEO's of each of the subsidiaries are responsible for setting the policy. The Compliance function, is responsible for the administration, revision, interpretation, and application of this Policy. All directors, executives, employees, outsourced employees, or seconded employees working for or on behalf of TCG are responsible for upholding principles as set forth in this Policy.

Reporting and Transparency

TCG endeavours to incorporate the number of Whistleblower reports received, types of misconduct, and measures taken in either its annual corporate governance report or annual Environment, Social, and Governance (ESG) report.

Policy Review

TCG will review and revise this Policy periodically if required so that it remains up-to-date and aligned with the company's core values, laws and regulations of the United Arab Emirates (UAE), and with global best practices. TCG shall make available this Policy and future amendments to directors, executives, and employees.

This Policy was last reviewed in April 2024.