

Whistleblowing Policy

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1. Purpose

RAK Properties, hereinafter referred to as (RAKP), is committed to conducting all business activities fairly, transparently, honestly, and in full compliance with all legal and regulatory standards.

To fulfill this commitment, it is necessary to provide a clear and robust whistleblowing policy. The goal of this policy is to ensure that all reports or concerns regarding improper, unethical, or illegal behavior or states of affairs regarding RAKP's property, personnel, suppliers, customers, or any additional third parties related to RAKP activities are dealt with effectively, securely, appropriately, and in full accordance with the law.

RAK Properties encourages all members and partners to report these concerns and will provide guidance and channels to do so.

2. Scope

This policy applies to all RAKP entities and personnel (including directors, shareholders, executives, employees, contractors, consultants, and interns) regardless of the team they work in or which office they work in. This policy also relates to any actions or concerns related to RAKP's suppliers, customers, or any other third party with whom RAKP has dealings.

3. Reportable conduct

RAK Properties encourages all personnel, suppliers, customers, or any other third party with whom RAKP has dealings to report any behavior or situation they find concerning. This broadly falls into two categories:

Category One: Threats to company reputation or financial holdings

The first concerns behavior that would cause harm either to (RAKP)'s reputation or financial health. The list below provides guidelines on what should be reported, but it is by no means exhaustive, and personnel are encouraged to use their best judgment if they witness concerning behavior that falls outside of the listed items below.

- Fraud
- Theft
- embezzlement
- corruption
- Blackmail
- Bribery
- Financial malpractice
- Tax evasion
- Failure to comply with legal or professional obligations
- Failure to comply with regulatory requirements
- Conduct that threatens (RAKP)'s reputation or financial well-being.

- Actions that would endanger the health or safety of Company personnel or the public
- Actions that cause damage to the environment.
- The provision of false information to public officers.
- A miscarriage of justice.
- Unauthorized disclosure of confidential information.

Category Two: Concerns regarding the well-being and effectiveness of personnel

The second category concerns actions or behaviors related to the effectiveness and productivity of RAKP personnel. This is a broader category of behaviors. If you are concerned about the well-being of a colleague or have a suggestion for how RAKP could improve the workplace or the environment, RAKP encourages you to raise the issue.

Unlike category one concerns, RAKP cannot guarantee that each issue will be addressed. However, RAKP is invested in making the workplace as open, transparent, and pleasant as possible. Issues to be addressed could include, but are not limited to:

- Concerns about a colleague's emotional, mental, or physical health.
- Suggestions for how to improve the workplace.
- Concerns about discrimination, exclusion, or other forms of unfair treatment.
- Concerns about a colleague's behavior: This could include sexual harassment, threatening behavior, or behavior that makes other personnel uncomfortable.

4. How to make a disclosure (for employees)?

a. Speak to your supervisor

The first and preferred method for raising concerns is to speak to your direct supervisor. Send an email asking for a meeting and raise the issue there.

If the whistleblower wishes to remain anonymous or is concerned that their supervisor is somehow involved in the concerning activity or their response is insufficient, you may raise concerns with a member of RAKP that you believe should be aware of the issue.

b. Use the anonymous whistleblowing channel

In the case that you wish to remain anonymous, the next option is to use the Faceup Whistleblowing System (<https://faceup.com/c/vtrlagiw>). Simply enter the company code: UDgWmD6Zqj. Choose the category of concern and give any details that you think are necessary to understand the issue.

Once you submit the report, you will receive a case code. You can log back into FaceUp at any time and track the progress of your report. This case code is also useful for another reason.

If the person who received your report needs more information, they can reach out and ask more questions while your anonymity remains protected.

c. Report to appropriate authorities (exceptional cases)

Finally, RAKP acknowledges that there may be extreme circumstances where it is necessary to consult an external third party, such as a regulator or the police. RAKP strongly encourages you to seek out guidance and advice before going to a third party.

5. Investigation

Once a report is received, it will be assigned to the appropriate party in RAKP to determine its validity. If the report is deemed credible, the manager will continue the investigation and may contact the whistleblower through the FaceUp app to get more information. If the report is maliciously false, the whistleblower will face disciplinary action.

6. Company Response

In the event that illegal activity is discovered, RAKP will refer the case to the proper authorities and provide all of the evidence gathered. In the case of legal but concerning activity, RAKP will respond on a case-by-case basis, ranging from lending assistance and support to personnel that may be struggling to dismissal should a person be found to be behaving in a way that violates the terms of their contract or is contributing to a hostile work environment.

7. How to make a disclosure (for the Public)?

Use the anonymous whistleblowing channel

- Use the Whistleblowing channel on our company website
- Choose the category of concern and give any details that you think are necessary to understand the issue.
- Once you submit the report, you will receive a case code.
- You can log back into (track your concern link) at any time and track the progress of your report.

This case code is also useful for another reason. If the person who received your report needs more information, they can reach out and ask more questions while your anonymity remains protected.

8. Protection for whistleblowers

RAKP will take appropriate measures to protect the whistleblower's identity and shield them from retaliation of any kind for stepping forward.

Harassment, discrimination, or retaliation against the whistleblower will not be tolerated. Any form of retaliation will be seen as grounds for disciplinary action or dismissal.

9. For line managers, department heads & HR personnel

If a RAKP employee, contractor, or a member of the public informs you of concerns covered by the whistleblowing policy, you must promptly contact the compliance unit to consult on appropriate action and determine if it would be appropriate for you to resolve it directly. Alternatively, you may hand over the concern to the compliance unit. In all cases, the compliance unit must be informed of all concerns raised in the scope of the whistleblowing policy for statistical and management reporting purposes.