



Whistleblowing Policy (Speak Up)



1. Purpose

To outline controls and mechanisms of whistleblowing towards any person whom Speaks Up in good faith when observing or suspecting compliance concerns or a non-compliant violation, in addition to providing the necessary protection to such individuals or those who cooperate in related investigations.

2. Scope

This Policy covers the reporting of all Compliance Concerns regardless of who reports the concern (e.g., a Company Employee, contractor, supplier, customer, etc.) or how it is reported (e.g., through the Human Resources, management, routine audits, the Speak Up email or otherwise). Those who report a Compliance Concern include but is not limited to:

- The members of the board of directors and its committees
- All **stc**'s employees at all managerial and functional levels
- Consultants
- Suppliers
- Contractors
- Business Partners
- customers

3. Definitions

3-1 The Company: Refers to STC Company.

3-2 Compliance Concern: A concern about an actual or potential material violation (as determined by the investigation and Anti-Fraud General Department after being advised of the concern) of the Company's Code of Ethics, rules/procedures/guidelines issued pursuant to the Code of Ethics, applicable law, regulation or other legal obligation by a Company Employee or third party acting on behalf of the Company.

3-3 Reporting Channels: All tools and methods used to report a Compliance concerns.

3-4 Whistleblowing (Speak up): Raising any violation that related to any illegal matter or non-compliance to laws, regulations, stc policies and Code of Ethics, in addition to raise any report it may be compliance concern or behavior that falls short of the spirit or intent of the high standards of ethical business conduct set forth in the Code of Ethics.

3-5 Good faith report (Speak up): A person raises a concern in good faith when there is a reasonable basis to believe that there has been a violation or a potential material violation of the Company's Code of Ethics, rules/procedures and the concern is not motivated in whole or in part for the purpose of seeking retribution, creating ill-will, settling a personal dispute or causing harm or embarrassment to another.

4. Policy Statement

The company is committed to promote a culture where individuals or any third party feel comfortable in raising Compliance Concerns and trust that the company will take those concerns seriously and promptly follow up on them, without incurring any type of retaliation.

1-4 Whistleblowing (Speak Up):

- 4.1.1 The Company encourages anyone (as outlined in clause '2.Scope' of this policy), whether inside or outside the Company, to Speak Up and raise their concerns in good faith. When observes or suspects a Compliance Concern, even where they believe that they may have been involved in the alleged misconduct.
- 4.1.2 Anyone who raises a Compliance Concern is encouraged to identify themselves when reporting Compliance Concerns in order to facilitate any necessary follow up communications.
- 4.1.3 The Company respects the right of all individuals to remain anonymous in the Speak Up process (where legally permissible).
- 4.1.4 Compliance Concerns include but are not limited to:
- 4.1.4.1 Non-compliance with laws or regulations.
- 4.1.4.2 Harassment or illegal discrimination based on race, ethnicity, religion, gender, and similar personal background and characteristics.
- 4.1.4.3 Retaliation for raising a Compliance Concern in good faith or cooperating in a Compliance Investigation.
- 4.1.4.4 Violating of any of the Authorities Matrix.
- 4.1.4.5 Not disclosing information required to be disclosed under the Company's Conflict of Interest policy.
- 4.1.4.6 Offering or accepting a business gift or hospitality that could improperly compromise an Employee's duty of loyalty to the Company.
- 4.1.4.7 Violations of the Company's Security and Safety Policy and practices that involve alleged intentional falsification of records, intentional or knowing violation of Health and Safety policy or law, fear of retaliation, or a reasonable likelihood of criminal enforcement.
- 4.1.4.8 Misuse of Company property, assets, or resources.
- 4.1.4.9 Unauthorized use or disclosure of Company information.
- 4.1.4.10 Compromising the integrity or accuracy of Company records.
- 4.1.4.11 Anti-competitive behavior, including non-compliance with antitrust laws and regulations (e.g., price fixing, market division, etc.) .
- 4.1.4.12 Misrepresentation of Company products or services.
- 4.1.4.13 Unauthorized use or disclosure of personal data.
- 4.1.4.14 Violations of financial security and trading laws, including insider trading.
- 4.1.4.15 Bribery.
- 4.1.4.16 Theft, fraud, or corruption.
- 4.1.4.17 The Company assets or property for personal use.
- 4.1.5 The whistleblower must treat the incident information as confidential and must not share it with anyone except the authorized parties according to this policy.

4.1.6 Anyone who Speaks Up and raises a Compliance Concern must include sufficient detail to allow the Company to investigate the matter. The details include without limitation:

- All related information and data of the case.
- The actual or estimated value of the harm or potential, if applicable.
- The duration and date of the case and how has it been identified.
- Parties, departments and systems related to the case.
- Causes that led to or contribute to the case.
- Any actions are taken up to the date of the report.
- Any additional information may help to investigate the case.
- Insufficient information may prevent the Company from being able to adequately investigate and address the Compliance Concern.

- In the event that the person raising the Speak-up concern does not respond to the team's inquiries with the necessary information regarding the incident within five (5) working days, the General Manager of Investigations and Anti-Fraud (or their delegate) may take the proper action such as investigating the incident, referring it to the concerned department internally or externally to the company, or closing it.

4-2 Reporting Channels:

4.2.1 Any person who wishes to raise a Compliance Concern anonymously in good faith can do so by contacting The General Department of Investigations and Anti-Fraud which is the competent authority to receive (whistleblowing -speak up) compliance violations (fraud, and corruption). In order to achieve this, an email has been allocated to receive such reports:

Speak-up@stc.com.sa

The General Department of Investigations and Anti-Fraud conducts the initial examination of incoming communications to determine the specialized departments that can handle violations that fall outside the jurisdiction of the General Department of Investigations and Anti-Fraud within the framework of confidentiality.

The General Department of Investigations and Anti-Fraud has the authority to follow up with the specialized departments regarding the communications referred to it.

4.2.2 Any person who wish to report a Compliance Concern in good faith can do so through one of the available channels for employees which include:

- Their Manager, any other Company Manager.
- The Human Resources Unit.
- The General Department of Investigations and Anti-Fraud.
- The dedicated Speak Up email address (Speak-up@stc.com.sa).

4-3 No Retaliation:

4.3.1 **stc** shall comply to protect anyone who Speaks Up in good faith.

4.3.2 The Company strictly prohibits any form of retaliation against any person for making a good faith report of a Compliance Concern or for cooperating with the Investigation and Anti-Fraud general department.

4.3.3 Retaliation against any person for making a good faith report (speak Up) of a Compliance Concern or for cooperating in an Investigation is itself a compliance violation and will be investigated. There will be punitive measures against whoever is proven to have harmed the whistleblowers.

4.3.4 The protection extended by the Company is not limited to those who Speak Up, but it also includes witnesses, individuals who co-operate in investigations. Examples of retaliation can include without limitation:

- Termination of services, reduction of grade or job title, or reduction/denial of increases, rewards, or promotions- Harassment
- Bullying and intimidation.
- Abuse of power and authoritarian practices such as transfer between departments, regions, and cities and changing the functional assignments.
- Harm of all kinds, including psychological harm, personal insult or infringement of funds and property, and defamation.
- Discriminatory practices.
- Parties affected by such actions shall report to the official channels mentioned above or any other channels provided by stc.

4-4 Confidentiality:

All Compliance Concerns must be kept confidential and information related to the Concern may only be shared on a strict need-to-know basis.

All Parties who are engaged as part of the investigation shall not discuss or disclose the nature of any discussions or information with any other party inside or outside stc.

4-5 Investigation and Resolution:

stc takes all integrity concerns seriously. When a Compliance Concern is raised through the designated Speak Up channels, it will be transmitted to The Investigations and Anti-Fraud General Department to review and follow up. This also applies to communications, which fall outside the department's domain to be communicated with the concerned authorities as needed.

The Investigations and Anti-Fraud team will treat all concerns with the subsequent investigation and resolution will follow the principles, rules, and processes outlined in the Investigation Policy.

In case of receiving any complaint that is not related to policy purpose, then the case will be forwarded to the concerned party within the company and the whistle-blower should be notified.

4-6 Responsibilities of the related parties:

4-6-1 Executive Management:

- Effective implementation of the Whistleblowing Policy (Speak Up) and everything contained within it.
- Establishing a supporting and encouraging culture to report Compliance Concerns within the company transparently and without hesitation.
- Providing the necessary protection to anyone who speaks Up including witnesses, individuals who co-operate in investigations, and parties who work on investigating these cases.
- Adopt best practices and behaviors that encourage a Speak Up Culture within The company.

4-6-2 The Managers

If an employee chooses to report a Compliance Concern directly to a manager:

- 4-6-2-1 The manager should understand and acknowledge to the employee that reporting a concern is a courageous, but an important act.
- 4-6-2-2 The Manager must listen very carefully to the employee's concern. They must take appropriate notes and then promptly report the concern to the Investigation and Anti-Fraud and corruption team. When the employee has fully reported the concern, the manager should thank the employee for speaking up, indicate that the concern has been understood and that it will be promptly shared with the Investigation and Anti-Fraud team. The Manager shall not conduct any Investigation into the compliance concern submitted to him.
- 4-6-2-3 The concern should be treated confidentially and the manager should not comment or express opinions about the character or ability of the person making the report, the subject or anyone else involved.
- 4-6-2-4 An open attitude, sensitivity, and professionalism is critically important in building trust and creating a culture in which employees will be comfortable raising concerns.

4-6-3 Employees:

- 4-6-3-1 All parties that are contacted by the Investigation team are required to cooperate with the investigators; provide truthful, accurate and complete information to the investigators; and, provide any documents or other materials that are needed for purposes of the investigation.
- 4-6-3-2 All parties must also keep the contents and subject matter of the interview confidential and not discuss it with other employees or external parties.

4-6-4 Investigation Team:

The Investigation Team will investigate proven violation of Compliance promptly.

4-6-5 The Whistleblower(who speak up):

Report the violation as soon as possible.

Take accurate measures in reporting the violation, show all the details related to the report, and support it with all the available information.

The company reserves the right to take regulatory and or legal measures if the reported case is proven to be misleading or was done in bad faith, for example, when submitting the reported case or after communicating with the whistleblower by the specialized authority, ensuring the confidentiality of the data and protecting the whistleblower, and reported case from any unknown source will be preserved that is in the case of there are no attached or reliable documents and evidence, and not disclosing the identity after being contacted.

5. References

- 5-1 stc work regulations Bylaws.
- 5-2 Code Of Ethics.

5-3 Anti-bribery law

5-4 Investigation Policy

5-5 Organization of the National Anti-Corruption Authority.