

## **SPEAK UP**

# **POLICY STATEMENT**

### **Overview**

The Speak Up Policy Statement (the Policy) outlines guidelines of NMDC Group and its subsidiaries' (the "Group") zero-tolerance policy against fraud, bribery, and corruption. This Policy sets out the standards for reporting concerns regarding any wrongdoings such as unethical behavior and any other misconduct; whether this wrongdoing has been attempted or already occurred.

### **Scope**

The Policy applies to all Disclosers who report a concern regarding any wrongdoing. The Policy covers any wrongdoing in the field of violations of laws and regulations and breaches of the Business Code of Conduct and the Group policies such as but not limited to bribery and corruption, health and safety, fraud, human rights violations, discrimination and harassment, maladministration or mismanagement, insider trading, misuse of data, and deliberate concealment of any of the above.

### **Policy Commitments**

NMDC Group to establish a mechanism for directors, employees, business partners, and anyone ("Disclosers") to report concerns regarding any wrongdoings, encourages Disclosers to speak up about these concerns, and protect Disclosers who report concerns in good faith and without malicious intent ("Whistleblowers") confidentially and against any retaliation.

### **Disclosing Concerns Regarding Wrongdoings**

When a Discloser has a concern about a potential wrongdoing falling within the scope of this Policy, the concern can be raised to the Direct Line Manager or Ethics & Compliance via [ethics@nmdc-group.com](mailto:ethics@nmdc-group.com) or Speak Up Helpline at +971(2) 5511475.

The concern can be raised within three levels of confidentiality:

- The Discloser reveals his/her name and contact information which will be treated with utmost confidentiality by Ethics & Compliance and anyone outside of the personnel involved in the investigation process shall not be aware of the Discloser identity.
- The Discloser reveals his/her name and contact information but states in the concern raised the choice to remain anonymous to anyone except Ethics & Compliance. In this case, Ethics & Compliance shall not reveal the Discloser identity to anyone without prior consent.
- The Discloser remains anonymous also to Ethics & Compliance, but a Discloser raising such concerns should recognize the limits that are inherent in investigating anonymous concerns. Thus, Ethics & Compliance encourages Disclosers to reveal their identity in order to permit a proper investigation.

### **Confidentiality and Protection from Retaliation**

We are committed to protecting the confidentiality of Disclosers who report any concern regarding any wrongdoing in good faith and without malicious intent (Whistleblowers) with the utmost seriousness. Information that could lead to his/her identification cannot be divulged without his/her consent. However, when required by law, the information may be passed on to the judicial authorities.

Disclosers are expected to maintain confidentiality and thus should not reveal the fact that they have disclosed any concern. They also must refrain from contacting the implicated persons to determine the facts, collect evidence, or demand restitution. Moreover, all personnel involved in the Speak Up and investigation process will maintain strict confidentiality about any disclosures made to them. The identity of any implicated persons and any Business Partners mentioned in the concern will remain confidential.

Further, the investigation report will only be disclosed to concerned parties on a substantiated "need to know" basis.

The Group is fully committed to taking all measures necessary to protect Whistleblowers against any retaliation. This protection covers any retaliatory measures such as but not limited to suspension and termination, demotion or refusal of promotion, transfer of duties, change of workplace and reduction in salary, negative performance

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appraisal, disciplinary measures, discrimination and harassment, and non-renewal of a fixed-term or temporary employment contract.

Any employee who retaliates against a Whistleblower will be subject to disciplinary actions up to and including termination of employment. Moreover, no retaliation shall be allowed against anyone who assists in an investigation.

### **False or Malicious Disclosures**

The Group encourages the disclosures of concerns to be made in good faith and without malicious intent. Ethics & Compliance will screen for any false and malicious disclosed concerns prior to investigating them. The Group does not investigate such disclosed concerns.

### **Investigation of disclosures**

Upon receiving a concern, Ethics & Compliance will notify the Discloser by acknowledging receipt of the concern within 5 business days, promptly registering it and conducting a preliminary assessment to determine if the concern falls within the scope of this Policy and further investigation is deemed necessary. In this case, Ethics & Compliance shall form an investigation team.

In cases where the concern doesn't fall within the scope of this Policy, Ethics & Compliance shall transfer it to the relevant department for their investigation.

Regular updates regarding the ongoing investigation will be shared with the Whistleblower solely at the discretion of the Investigation Team.

Once the investigation is concluded, the outcome is reported to the Audit Committee/Group Chief Executive Officer (GCEO), as appropriate.

### **Compliance**

Violations of laws and breaches of the Business Code of Conduct and Group policies can have serious legal consequences for the Group as well as for directors and employees, thus it is important that we comply with them in the countries where we operate, at all times. This includes a whistleblowing system to detect and address unethical behaviors effectively. Remediation efforts involve taking disciplinary actions against violations to ensure continuous adherence to legal and ethical standards.

### **Roles and Responsibilities**

In general, all employees should uphold principles as set forth in this Policy. Responsibility of setting the Policy (including any amendment thereof) and monitoring its compliance is with the Board of Directors while the Ethics & Compliance Function shall have responsibility for ensuring the implementation/compliance of the Policy and continuous improvement.

### **Policy Review**

Ethics & Compliance shall review this Policy as and when required and propose modifications and updates as deemed necessary.

This Policy Statement is only an extract from the original Speak Up Policy.  
This Policy Statement was last reviewed in May 2024.

