WHISTLEBLOWER POLICY

1. Purpose

The objective of this policy is to establish a safe, transparent, and effective process for reporting suspected illegal, unethical, or improper conduct directly by the Company, its employees, consultants, contractors, partners, vendors, and any third-party individuals engaged in business with Expertise Consultancy Libya (EC).

2. Scope

This policy applies to Company personnel and external stakeholders:

- All full-time and part-time employees
- Temporary workers and interns
- Consultants and contractors
- Security teams and support staff
- Suppliers and service providers
- Any third party acting on behalf of or in cooperation with EC

3. Definition of a Whistleblower

A whistleblower is any individual covered under this policy who reports conduct they reasonably believe to be:

- Illegal under local or international law
- Unethical or fraudulent
- Unsafe or harmful to people or the environment
- A violation of the EC Code of Conduct or policies

Whistleblowers are not responsible for conducting investigations; their role is to report the concern in good faith.

4. Reportable Concerns

Examples of improper conduct that should be reported in accordance with this policy would include, but are not necessarily limited to:

- Bribery or corruption
- Fraudulent reporting or forged documentation
- Health and safety violations

- Discrimination, threats, harassment, or abuse
- Retaliation or misuse of authority
- Unsafe or dangerous working conditions
- Dangerous or environmentally damaging activity
- Unethical conduct involving third-party contracts or agreements
- Financial mismanagement or falsified reporting

5. Reporting Concerns

Company personnel or external stakeholders who believe improper conduct has occurred or will occur are encouraged to report their concerns in accordance with this policy.

Our Company is committed to providing a safe working environment for all employees. If you know or suspect Misconduct has occurred or is likely to occur, you are encouraged to promptly come forward with such information and first discuss the situation through normal internal management channels, unless you are uncomfortable doing so.

If you are not comfortable discussing the issue with your supervisor or if you have already discussed it with your supervisor but do not feel the issue has been adequately dealt with or resolved, you should then speak with a representative of the local department or the Human Resources Department of the Company.

However, if the Misconduct cannot be appropriately resolved by reporting through the internal management channels described above, whether because such reporting would not provide the necessary level of confidentiality, or because your local management is participating in or condoning the Misconduct that concerns you, we encourage you to raise the issue immediately via the neutral dedicated Ethics line or e-mail address.

Reports should be made as soon as possible through the following channels:

- **Compliance Officer**: ethics@ec.ly or +218 912643433

Reports should include as much relevant information as possible to support an appropriate review and investigation.
Anonymous reports are accepted, provided they contain sufficient detail to enable a meaningful investigation.

All individuals are expected to act in good faith when raising concerns. Knowingly making false allegations is a serious offence and may result in disciplinary or legal action.

6. Protection for Whistleblowers

No whistleblower who makes a report in good faith will suffer retaliation. Retaliation includes, but is not limited to:

- Dismissal or demotion
- Loss of business or contract
- Harassment or intimidation
- Denial of future engagement

Any retaliatory act should be reported immediately through the reporting channels.

Violators will face disciplinary action, including contract termination or legal escalation.

7. Investigations and Resolutions

All reports will be reviewed and, where necessary, formally investigated. The process will include:

1. Initial review conducted by designated investigators (internal or external).
2. Fact-finding and documentation.
3. Corrective action, if required
4. Closure report and feedback to the whistleblower (if not anonymous)

If the concern involves a member of the management team or the reporting channels listed, a neutral third-party reviewer may be engaged.

Expertise Consultancy Libya encourages a culture of accountability, safety, and ethical behaviour. Anyone acting in good faith to report misconduct plays a critical role in protecting our people, partners, and reputation.

EC Libya Managing Director - Tamim Rashed

