

OOREDOO TUNISIE WHISTLEBLOWING POLICY

1. Introduction

Ooredoo Tunisie is committed to high standards of transparency, integrity, compliance and accountability. This policy is designed to provide a mechanism for employees, contractors, customers and suppliers to report any activity that violates laws, regulations, policies, or the Company's code of Business Conduct & Ethics.

2. Policy Objectives

The policy aims to:

- Help develop a culture of openness, accountability and integrity.
- Encourage staff to report suspected wrongdoing without fear from retaliation.
- Provide staff and other stakeholders with guidance as to how to raise their concerns.
- Enable Management to be informed at an early stage about acts of misconduct.

3. Confidentiality and Protection

Whistleblowing reports are kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Ooredoo Tunisie is committed to protect the person who reports in good faith from retaliation.

4. Scope

This policy applies to all employees of the company, in addition to external parties, including agents, contractors, suppliers, customers and generally anyone who has business relationships with the Ooredoo Tunisie.

5. Definitions:

Whistleblowing	Any notice or disclosure of information which relates to suspected violations, wrongdoing, behaviors or practices that are not consistent with Ooredoo Tunisie Code of Business Conduct and Ethics, regulations, policies, decisions in force in the company, breach of a legal, statutory or regulatory requirement that may damage or prejudice the image of Ooredoo Tunisie.
Whistleblower	A person or entity that discloses improper or illegal activities, whether an Ooredoo Tunisie employee or a third party including, for example, applicants for employment, agents, consultants, suppliers, contractors, customers, partners or the general public. The role of the whistleblower is limited to reporting irregularities only, and ends at this point.
Good Faith	Good faith is assumed if reports are not made by malice or for personal benefit, and there is reasonable basis to

	believe that the report is true, and does not contain false information and data. In all cases, the good faith is associated with proving the authenticity of the report.
Wrongdoing/Misconduct/improper Activities	These include practices, for example, financial fraud, violation of laws, regulations, policies, decisions, instructions, Code of Ethics and Business Conduct, mismanagement, abuse of power & authority, endangering health, safety and environment or neglect of duty
Protected Disclosures	A disclosure of information that the individual reasonably believes that the information show violation, wrongdoing or practices and behaviors not consistent with Ooredoo Tunisie's code of Business Conduct and Ethics, regulations, policies, etc.
Retaliation	means any direct or indirect detrimental action that adversely affects the employment or working conditions of an individual, where such an action has been recommended, threatened or taken for the purpose of punishing or intimidating an individual because that individual engaged in an activity protected by this policy.

6. Reporting Channels

Reports can be submitted through the following channels:

- Ooredoo Tunisie web site
- Email : Whistleblowing@ooredoo.tn
- Post : Chief Audit Executive, Jardins du Lac 1053 Les Berges du Lac Zenith RDC Tunis, Tunisie BP N 641
- Phone: +216022121111

7. Assessment of Whistleblowing Reports:

All reported complaints/concerns are subject to the following assessments:

Preliminary Verification:

All reports/complaints received by the Chief Audit Executive (CAE) undergo preliminary verification which:

- focuses solely on the information within the report and any existing initial data.
- occurs promptly after receiving the report/complaint.

If delays arise, the whistleblower is informed of the reason for the delay.

Verified claims are presented to the Audit & Risk Committee (ARC) for their decision.

Investigating Alleged Misconduct of Improper Activities:

This section outlines the procedures for investigating reports of misconduct or improper activities within the company as follows:

1. Report Review and Investigation Initiation: Verified reports of misconduct are reviewed by the Audit & Risk Committee (ARC). The ARC determines whether a formal investigation is warranted.

2. Investigation Team Formation: The ARC may:

- Instruct the Chief Audit Executive (CAE) to conduct the investigation.
- Form an independent Investigation Committee comprising 3-5 members.
- The ARC maintains oversight throughout the investigation process.

3. Investigation Scope and Procedures: Investigation teams have the authority to:

- Involve other relevant departments and individuals.
- Request and obtain necessary data and documents from all company departments.
- All departments are obligated to fully cooperate with the investigation team.

4. Whistleblower Involvement: Staff members are required to cooperate fully with authorized investigations. The whistleblower may be interviewed to clarify their concerns. The whistleblower may be asked to provide a written statement.

5. Interim Measures: In cases where the alleged misconduct is serious, the accused individual(s) may be suspended during the investigation. These suspensions are implemented in accordance with the company's Human Resources policies.

6. Investigation Outcomes: The investigation may be suspended or terminated if the report is deemed unfounded. In such cases, a report is submitted to the ARC for their decision. If the report is found to be malicious or intended to defame an employee or department, disciplinary or legal action may be taken against the whistleblower as determined by the ARC.

8. Notification of Results

The CAE or Investigation Committee submits the final investigation report to the Audit & Risk Committee (ARC).

The ARC reviews the report and determines the appropriate course of action.

The CAE is responsible for:

- Notifying all relevant parties and the whistleblower of the investigation findings.
- Coordinating with relevant departments to address any identified violations or misconduct.