



**Nama Chemicals Company**  
**(Saudi Public Joint-Stock Company)**

**Reporting Policy for Violating Practices**

## Document Control

Document Information	
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1.	Preamble	3
2.	Definitions	3
3.	Objectives	3
4.	Scope of Application	4
5.	Confidentiality	4
6.	Reporting Validity	4
7.	Disclosure Procedures	4
8.	Policy Review and Revision	5
9.	Enforceability and Publication	5

**Article 1: Preamble:**

In implementation of the provisions of Article (84) of the Corporate Governance Regulations issued by the Board of the Capital Market Authority and the Governance Manual of the Company, and based on the audit committee's proposal, a "Policy for Reporting Violating Practices" has been prepared for Nama Chemicals Company, which applies to all stakeholders, including employees of the company and all the subsidiaries of Nama Chemicals Company.

The general principle requires that all company employees not disclose any confidential information about the company, its employees, operations, and records. However, as an exception to this and in application of the principle of transparency, any employee of the company who discovers information that involves serious violating practices within the company must directly report this information to the competent department while ensuring his right, according to specific mechanisms, that no retaliatory actions will be initiated against him.

**Article Two: Definitions:**

The following words and expressions shall have the meanings shown in front of them, unless the context requires otherwise:

**Policy:** Reporting Policy for Violating Practices.

**Company:** Nama Chemicals Company.

**"Board of Directors" or "the Board":** Board of Directors of Nama Chemicals Company

**Member:** A member of the Board of Directors appointed by the general assembly of the company in accordance with the provisions of its articles of association, whether he is independent or not independent, executive or non-executive. This definition applies to include the alternate member appointed to succeed a former member to complete his tenure.

**Governance Regulations:** The Corporate Governance Regulations issued by the Board of the Capital Market Authority.

**Companies Law:** The Companies Law issued by Royal Decree No. (M / 3) dated 28/01/1437 AH.

**Authority:** Capital Market Authority

**Stakeholders:** Every person who has an interest in the company, such as employees, creditors, customers, suppliers, and society.

**Benefits:** Amounts, allowances, earnings and the like, periodic or annual bonuses related to performance, short or long-term incentive plans, and any other in-kind benefits, with the exception of reasonable actual expenses and costs incurred by the company on behalf of a member of the board of directors for the purpose of performing his work.

**Article Three: Objectives:**

This policy aims to encourage the employee to report violating practices without feeling embarrassed or fearful, and encourage him to disclose those practices by clarifying the positives that benefit the company and its employees, and that failure to disclose them may have an adverse and negative impact that harms the interests of the company and employees. Disclosure of violating practices is not just a service provided by the employee to the company, but rather it is a duty of obligation for everyone, and that covering up any violating information and practices is considered a violation that may expose the employee who covers up to accountability.

**Article Four: Scope of Application:**

- A. Facilitating notifying the Board of Directors by the stakeholders (including workers in the company) of the actions or practices that may be issued by the executive management that violate the applicable laws, regulations and rules or that raise suspicion in the financial statements or internal control systems or otherwise, whether these actions or practices are for their interest or not, and conducting the necessary investigation in this regard.
- B. Maintaining the confidentiality of reporting procedures by facilitating direct contact with an independent member of the audit committee or other specialized committees.
- C. Assigning a competent person to receive complaints or notifications of stakeholders and to deal with and handle them.
- D. Allocating a phone number or email to receive complaints.
- E. Providing the necessary protection for stakeholders.
- F. Enabling company employees to raise their concerns to the company's management. These concerns include wrongful financial practices or fraud, non-compliance with obligations established in applicable laws and regulations, risks related to health and safety, criminal acts, unethical misconduct or attempting to commit any of the aforementioned acts.

**Article Five: Confidentiality:**

The company will deal with all reporting cases with complete confidentiality and guarantees that the reporting person will not reveal his identity to the extent that it does not hinder the investigation process in the reported practices. However, confidentiality does not exempt the reporting employee from providing evidences to prove the violating practices when requested to do so.

**Article Six: Reporting Validity:**

The company deals with any reporting seriously and decisively and takes all necessary measures and investigations required to verify the correctness of what has been reported. However, in the event that, through the investigations

conducted by the company, it is found that the employee's allegations are incorrect, the company may impose the appropriate penalty against him if it appears that he has reported in bad faith or for a malicious purpose. If the reporting employee made this in good faith, then no action will be taken against him.

If it is evident through the investigations conducted by the company that some of the reported practices involve criminal acts or activities in violation of the laws and regulations in force in the Kingdom, then the person carrying out the investigation must inform the competent authorities in the company, which in turn must inform the official authorities of the reported violations.

**Article Seven: Disclosure Procedures:**

The company establishes a mechanism for receiving reports to ensure independence in the investigation and dealing with them in a sensitive and serious manner, and the reports are dealt with according to the risks they pose.

If the reporting person is one of the company's employees, he can inform his superior to take the necessary measures. He can also, in case he does not want to inform his superior, submit the report to the head of the company's internal audit department or the head of the audit committee or the legal counsel of the company (if any). He can also use the phone or e-mail dedicated to receive reports.

**Article Eight: Policy Review and Revision:**

This policy is subject to periodic review with the aim of developing and updating it in line with the relevant laws and regulations and in accordance with what the Board deems appropriate, and no amendment may be made to it without a recommendation from the Board of Directors.

**Article Nine: Enforceability and Publication:**

This policy (and any subsequent amendments to it) shall enter into force from the date it is adopted and approved by the Board of Directors. This policy shall be published on the company's website to enable shareholders, employees, stakeholders and the public to view it and in accordance with any legal requirements imposed by the competent and concerned authorities.