



# Whistleblowing Policy

Saudi Cable Company

Second Edition

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Prepared by: Internal Audit Department

This policy has been issued pursuant to Board of Directors Resolution No. 34/2025 dated 13 November 2025.





## Contents:

|                                                                              |   |
|------------------------------------------------------------------------------|---|
| First, Objective.....                                                        | 3 |
| Second: Scope of Application.....                                            | 3 |
| Third: Approval of the Whistleblowing Policy.....                            | 3 |
| Fourth: Definitions.....                                                     | 4 |
| Fifth: References.....                                                       | 5 |
| Sixth: The Company's Obligations Toward Its Employees and Stakeholders ..... | 5 |
| Seventh: Receiving Reports and Complaints.....                               | 5 |
| Eighth: Cases Requiring Whistleblowing.....                                  | 6 |
| Ninth: Whistleblower Obligations.....                                        | 7 |
| Tenth: The Company's Obligations Upon Receiving Complaints and Reports.....  | 7 |
| Eleventh: Channels for Receiving Reports and Violations.....                 | 8 |
| Twelfth: Stages of Handling Complaints or Reports.....                       | 8 |
| Thirteenth: Final Provisions.....                                            | 9 |





## First, Objective

This policy aims to reinforce a culture of integrity, transparency, and accountability within the work environment of Saudi Cable Company and its subsidiaries. It also seeks to provide a clear and reliable mechanism for employees and all stakeholders to report any practices or behaviors that may constitute a violation of applicable laws and regulations, the company's internal policies, or ethical and professional standards.

This policy defines the procedures and responsibilities related to the whistleblowing process and ensures the protection of whistleblowers from any adverse consequences or retaliatory actions, while maintaining the confidentiality of the information provided to the greatest extent possible.

## Second: Scope of Application

This policy applies to all individuals and entities that have an employment or interest relationship with Saudi Cable Company, including but not limited to: members of the Board of Directors, its sub-committees, executive officers, employees at all job levels, consultants, contractors, suppliers, customers, partners, volunteers, and any person working for or representing the company. This policy applies regardless of where the violation occurs, whether inside or outside the company.

## Third: Approval of the Whistleblowing Policy

The responsibility for reviewing and updating this policy rests with the Board of Directors. The Internal Audit Manager prepares the draft of the policy and submits it to the Audit Committee, which provides the necessary recommendations to the Board of Directors. The Board then approves it through an official resolution.





## Fourth: Definitions

**Policy:** The policy for submitting complaints or reporting misconduct.

**Misconduct:** Includes all types of behaviors or practices that are illegal, unethical, inefficient, or inconsistent with the values, principles, and policies adopted by the company. This includes any actions committed by any person working for or representing the company, including members of the Board of Directors, current employees, committee members, subsidiaries and joint ventures, contractors, suppliers, customers, partners, and volunteers.

**Stakeholders:** All parties that have a direct or indirect interest in the company, such as employees, customers, suppliers, creditors, and shareholders.

**Unethical Matters:** Practices or behaviors, whether intentional or unintentional, that contradict prevailing ethical principles and values, harm the company's reputation or interests, or fail to conform to professional conduct or established work standards.

**Whistleblower:** The person who reports a violation or unethical behavior related to the company.

**Reporting:** The formal process through which information regarding a violation is submitted and the subsequent investigation is followed up.

**Company:** Saudi Cable Company and its subsidiaries.

**Board of Directors:** The Board of Directors of Saudi Cable Company.

**Executive Management or Senior Executives:** Individuals responsible for managing the company's day-to-day operations and for proposing and implementing strategic decisions, such as the Chief Executive Officer, their deputies, and the Chief Financial Officer.

**The Audit Committee:** formed by the Board of Directors.

**The Articles of Association:** The company's Articles of Association in addition to the applicable internal regulations and policies.

**Related Parties:** Individuals or entities (companies) that have the ability to exercise control or significant influence over the company, or that may be affected by the company's decisions due to the existing relationship between them. This includes members of the Board of Directors, parent companies, subsidiaries, and joint ventures in which the company participates.





## Fifth: References

This policy has been prepared in accordance with Article (81) of the Corporate Governance Regulations issued by the Board of the Capital Market Authority under Resolution No. (8-6-2017) dated 16/05/1438AH corresponding to 13/02/2017AD, and based on the Companies Law issued by Royal Decree No. (M/132) dated 01/12/1443AH corresponding to 30/06/2022AD, and in alignment with the Capital Market Authority's amendments related to the new law, including Resolution No. (8-5-2023) dated 25/06/1444AH corresponding to 18/01/2023AD.

## Sixth: The Company's Obligations Toward Its Employees and Stakeholders

6-1 The company shall encourage its employees and all stakeholders to report any potential violations related to the company, whether they occur within or outside the company's scope of work.

6-2 The company is committed to providing a safe and encouraging environment for employees and stakeholders, ensuring the confidentiality of their identities and the information submitted in reports, and protecting such information throughout all stages of handling the report, in order to build trust and encourage reporting.

6-3 The company shall provide the necessary protection to whistleblowers from any retaliatory actions or adverse consequences that may arise as a result of reporting violations, in accordance with the provisions set forth in this policy.

6-4 The company shall encourage all its employees and stakeholders to report any suspected violations, while emphasizing the importance of avoiding the spread of rumors or submitting false or unsubstantiated claims.

6-5 The company is committed to informing all its employees and stakeholders of the available channels and methods for reporting violations by providing comprehensive and clear information about the various reporting mechanisms, which have been defined in accordance with the controls set forth in the Eleventh Article of this policy.

## Seventh: Receiving Reports and Complaints

7-1 The Manager of Internal Audit is responsible for receiving reports and complaints submitted to the company, reviewing them together with the Internal Audit Department when required, and handling all reports and complaints with the highest level of confidentiality and in accordance with the principles of the Internal Audit Code of Ethics. Reports related to the Chief Executive Officer shall be referred directly to the Audit Committee.

7-2 Upon receiving any report or complaint that does not relate to administrative or financial fraudulent activities, the Manager of Internal Audit shall review the complaint, verify the attached documents or any other evidence, and then notify the Chief Executive Officer of the received complaint or report. If the report or complaint relates to matters such as embezzlement or fraud, or involves related parties, or any other issues that fall within the scope of the Audit Committee's responsibilities, the Manager of Internal Audit shall immediately notify the Audit Committee, then the Committee will issue the appropriate directive to the concerned party as it deems appropriate.





7-3 The Chief Executive Officer of the company is responsible for making the appropriate decision regarding reported cases that do not involve issues such as fraud, embezzlement, matters related to the CEO personally, or related parties. The CEO shall also inform the parties concerned of the actions taken and their outcomes.

7-4 The Chief Executive Officer or the Audit Committee, depending on the nature and sensitivity of the report, has the right to form a specialized investigation committee to handle any report or complaint that requires an in-depth investigation. This committee shall examine the case and submit its recommendations to the appropriate authority, in accordance with the authority matrix, for a final decision.

7-5 If the report is directed against the Chief Executive Officer, the Manager of Internal Audit shall refer it directly to the Audit Committee, which shall follow the procedures and protocols specified in this article for handling such cases.

### **Eighth: Cases Requiring Whistleblowing**

The company strives to promote a work environment characterized by integrity and transparency, and encourages all stakeholders and its employees to contribute effectively to achieving this. Accordingly, the company urges everyone to report any information that may help correct errors, uncover violations, or reinforce institutional values. Reporting cases include, but are not limited to, the following:

8-1 Financial and administrative corruption, including any unlawful exploitation of the company's financial or administrative resources, or exceeding administrative authorities.

8-2 Violations of laws, regulations, instructions, and mandatory internal policies that govern the company's operations.

8-3 Violations related to occupational health and safety in the workplace, and any behavior that may harm the environment, workplace, or threaten the safety of individuals.

8-4 Inappropriate behaviors that conflict with public order, Islamic values, and the customs and traditions of society.

8-5 Misuse of the company's assets, property, resources, or anything of similar nature.

8-6 Misuse of authority or granted powers, or making decisions that do not serve the best interests of the company.

8-7 Carrying out irregular operations related to the company's activities, circumventing regulations, or concealing procedural or regulatory violations.

8-8 The existence of a conflict of interest in any of the contracts or activities entered into or carried out by the company, and the failure to disclose such conflict in the proper regulatory manner.

8-9 Obtaining personal or undue benefits or gains.

8-10 Disclosing confidential or sensitive information in an unauthorized or improper manner.

8-11 Deliberate concealment, gross negligence, destruction of official documents, or covering up fraudulent financial reports.

8-12 Any gross negligence that may result in causing significant harm to the company.

8-13 Receiving undue rewards or benefits from external parties dealing with the company.

8-14 Concealing any of the above-mentioned violations or similar acts.





## Ninth: Whistleblower Obligations

The whistleblower must observe the following:

- 9-1 Ensure accuracy and credibility in the information provided, and avoid submitting rumors or claims that are not supported by real evidence.
- 9-2 Provide all possible details related to the violation, including an accurate description of the incident, the date and time in which it occurred (if possible), and the individuals involved in the violation. All available evidence supporting the report must also be attached, such as photographs, recordings (if available and legally obtained), or any other relevant documents that may assist in the investigation process.
- 9-3 Promptly report the violation as soon as it is discovered.
- 9-4 Maintain complete confidentiality of the report or complaint, in order to serve the company's best interests and ensure the effectiveness of the investigation process.
- 9-5 The whistleblower must disclose its identity and provide its contact information to enable the company to communicate with it and to accurately identify the violation and precisely understand its details.
- 9-6 A whistleblower who chooses not to disclose its name and identity is not entitled to the protection provided under this policy, unless the company is able to identify its identity through its own means.
- 9-7 The whistleblower bears full responsibility for any allegations proven to be malicious, intended to defame others, harm them, retaliate against them, or undermine trust in the company, its employees, or its stakeholders.

## Tenth: The Company's Obligations Upon Receiving Complaints and Reports

- 10-1 Handling the report or complaint with complete seriousness, regardless of its nature, impact, significance, or the information it contains.
- 10-2 Taking all necessary measures to protect the whistleblower from any retaliatory actions or adverse consequences, in accordance with the provisions set forth in this policy.
- 10-3 Taking the necessary corrective actions regarding the violation if it is proven after the investigation.
- 10-4 Considering the interests of all company employees and stakeholders when handling reports.
- 10-5 Referring reports or complaints to the competent authorities inside or outside the company, if necessary.
- 10-6 The company is committed to retaining records related to reports and complaints, along with all relevant documents, for the period prescribed in accordance with applicable laws and regulations.
- 10-7 This policy ensures that the whistleblower's identity will not be disclosed if it does not wish to reveal it, except in exceptional cases that require disclosing its identity—such as legal necessity before the relevant government authorities. The whistleblower must refrain from conducting any personal investigations regarding the report.
- 10-8 Maintaining a dedicated record of reports and related documents for follow-up and documentation purposes.





## Eleventh: Channels for Receiving Reports and Violations

The Manager of Internal Audit is the party responsible for receiving reports through the designated email ([whistleblowing@saudicable.com](mailto:whistleblowing@saudicable.com)). The Manager must review and handle all reports and complaints, knowing that this channel is protected from interference by any external party.

## Twelfth: Stages of Handling Complaints or Reports

The action taken regarding any violation, in accordance with the provisions of this policy, depends on the nature of the violation itself, and it may require conducting an internal investigation or an investigation by external parties. The following steps shall be followed when handling any report:

12-1 Initial verification of the validity and credibility of the report or complaint.

12-2 The Manager of Internal Audit shall inform the Chief Executive Officer upon receiving reports, unless the report is directed against the CEO itself, or has not been referred by the Audit Committee in cases involving embezzlement or fraudulent activities.

12-3 It is noteworthy that some reports may be resolved without the need for a formal investigation.

12-4 The whistleblower shall be provided with a notification confirming receipt of the report.

12-5 If the report is found to be based on reasonable and credible information, it shall be referred—based on a recommendation from the Chief Executive Officer or the Audit Committee, depending on the sensitivity and nature of the report or violation—to an investigation committee. This committee must not include any person who has a relationship with, or authority within, the department being reported. Its authority shall be defined to investigate the report and issue appropriate recommendations, and the appropriate decision shall be taken in accordance with the company's authority matrix.

12-6 Disciplinary or corrective actions resulting from the violation shall be determined in accordance with the laws, regulations, and policies in force in the Kingdom of Saudi Arabia at first, followed by the company's approved internal policies and procedures.

12-7 The whistleblower may not be informed of any disciplinary or other actions that may violate confidentiality obligations toward other parties.

12-8 All records and documents related to reports and complaints shall be retained for documentation and future review purposes.





## Thirteenth: Final Provisions

13-1 This policy becomes effective as of the date of its approval by the Board of Directors.

13-2 The Board of Directors has the right to interpret or clarify any of the provisions contained in this policy.

13-3 The Manager of Internal Audit oversees the implementation of this policy and reviews it periodically or when necessary. The required amendments shall be made to ensure continuous improvement, adoption of best practices, and alignment with any changes that may occur in relevant laws and regulations.

13-4 Investigation committees formed by the Chief Executive Officer must exclude members of the Internal Audit Department in order to preserve its independence and objectivity, unless an immediate directive is issued by the Audit Committee appointing the Manager of Internal Audit as a member of such committees.

13-5 The Board of Directors may approve amendments to the articles of this policy at any time it deems appropriate, based on a recommendation from the Audit Committee and its approval by a formal resolution issued by the Board.

13-6 This policy shall not be considered a substitute for the provisions of the company's Articles of Association and its implementing regulations. In the event of any conflict between this policy and the provisions of the Articles of Association, the provisions of the Articles shall apply, and the remaining articles of this policy shall remain in effect.

13-7 The company shall publish this policy, or a summary of it, on its official website or through any other means it deems appropriate, in order to enable shareholders and stakeholders to review it and be aware of its contents.

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