



QIC Whistleblower Policy

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Distribution List

Name
To relevant employees within the QIC and its subsidiaries

Signed on: 05-Aug-2026

Salem Al Mannai

Group CEO

Copyright Statement

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Contents

This document is divided into sections. The contents of the document are to be treated as confidential and are not to be disclosed or distributed to any unauthorized persons or clients.

Company Standards and administration

The Company Standards contains policy of document administration and control and maintained by the Governance Department and this policy should be read in conjunction with the Company Standards.

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Definitions

Term	Definition
Regulatory Authority	Applicable regulatory authority or Supervisor e.g. QCB in the State of Qatar and/or QFCRA in Qatar Financial Centre
QCB	Qatar Central Bank
QFCRA	Qatar Financial Centre Regulatory Authority
Company	Company means Qatar Insurance Company
Group	Qatar Insurance Company, together with its subsidiaries
GCRO	Group Chief Risk Officer
BOD	Board of Directors
BU	Business Unit
GCEO	Group Chief Executive Officer
SOP	Standard Operating Procedures
HOC	Head of Compliance
Whistleblowing	Whistleblowing means the reporting, in good faith, of any suspected or actual wrongdoing, misconduct, or irregularity within the Company by an employee or other individual, where there is a reasonable belief that such information indicates a breach of laws, regulations, or internal policies, or poses a risk to the Company, its stakeholders, or the public.
Misconduct:	Generally, misconduct committed is a violation of law, rules, and regulations and/or relates to, or is a direct threat to, public interest, fraud, health, safety violations, and corruption. A few examples are the following: a) Financial or non-financial mal-administration or malpractice or impropriety; b) Misconduct: Academic or professional malpractice (intentional misconduct, fraud or deceit against ‘Company’) and criminal offence; c) Improper conduct or unethical behaviour; and d) Attempts to suppress or conceal information relating to any of the above.

1. Purpose

- 1.1. The purpose of this Policy is to encourage all employees of the Company to disclose any Whistleblowing Matters that may adversely impact the Company, its customers, shareholders, employees or the public at large.
- 1.2. This policy document advocates that an employee can report Whistleblowing Matters without fear of reprisal.

2. Scope:

- 2.1. This Policy applies to all employees, internal and external stakeholders of the Company.
- 2.2. This policy does not cover customer or employee grievances. The Company has dedicated channels for the management and resolution of such matters. For **customer-related grievances**, please refer to the **customer service contact points outlined in the insurance policy documents**. For **employee-related grievances**, please refer to the **grievance channel available on the internal employee portal** or HR Policies and Procedures.

3. Responsibilities

- 3.1. The owner of this Policy is Group Chief Risk Officer (GCRO), and responsibility for the compliance to the Policy is with the Group Head of Compliance (HOC).
- 3.2. The Group HOC is also responsible for communication, implementation and monitoring of the Policy.

4. Policy

4.1. General Policy Statements

1. Support for the establishment of whistle-blower provisions and protections have been rendered by a raft of various legislations and guidelines in the corporate world.
2. 'Company' has assigned the Risk Management & Compliance Committee of QIC to address whistle-blowing matters.
3. The Group Chief Risk Officer (Gr. CRO) is the designated point of contact for all whistle-blowing concerns. The Gr. CRO will report the whistleblowing cases to the Risk Management & Compliance Committee (RMCC).
4. The following constitutes Whistle-Blowing Matters. This is an indicative but **not** exhaustive list:
 - a) Accounting irregularities (non-compliance with regulatory requirements, fraudulent accounting entries, misstatement of accounts etc.);
 - b) Violations of regulations/ breach of statutory laws adversely impacting the reputation or causing significant financial consequences;
 - c) Harassment, vindictive actions; intimidations;
 - d) Conflicts of interest;
 - e) Corruption;
 - f) Falsification/ destruction of company records;
 - g) Serious Discrimination by Senior Management ;
 - h) Release of proprietary information;
 - i) Covering up deficiencies in internal controls;
 - j) Theft, Embezzlement and frauds;
 - k) Customer privacy violations;
 - l) Unacceptable practices;
 - m) Market Misconduct;
 - n) Misrepresentation of facts;
 - o) Health and safety risk, including risk to public as well as to other employees;
 - p) Abuse of power or powers and authority for any unauthorized user or personal gain or for the gain of others; and

- q) Misuse of 'Company's' assets.
5. Whistle-blowers are also a key defence against management override of internal controls and thus can help improve corporate governance.

4.2. Safeguards

1. Harassment or Victimization: 'Company' recognizes that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. 'Company' will not tolerate harassment or victimization and will take action to protect the whistle-blower that raises a concern in good faith. However, this does not imply that if the whistle-blower is already the subject of disciplinary or redundancy procedures, those procedures will be halted as a result of whistle-blowing.
2. Confidentiality: The confidentiality of the whistleblower is strictly safeguarded, and no line function or department heads have access to the information or identity of the whistleblower submitted through the whistleblowing channels.
3. Anonymous Allegations: 'Company' encourages the whistle-blower to disclose his/her name in reporting the allegation. Concerns expressed anonymously are much less powerful but will nevertheless be considered at the discretion of the Risk Management and Compliance Committee. In exercising the discretion, the factors to be taken into account would include:
 - a) The seriousness of the issues raised;
 - b) The credibility of the concern; and
 - c) The likelihood of confirming the allegation from other sources.
4. Untrue Allegations: If a whistle-blower makes an allegation in good faith, which is not confirmed/proven by the ensuing investigation, no action will be taken. If, however, the whistle-blower makes malicious or vexatious allegations, appropriate disciplinary action will be initiated against the concerned person.

4.3. Whistleblower Protection

1. Any 'Company' employee who experiences adverse employment action i.e. he/she was discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against in the terms and conditions of employment by his/her superior because of lawful acts done by the employee on behalf of the company or others, will be entitled to all relief necessary.

2. The Company shall not retaliate, and shall not tolerate any retaliation by management or any other person or group, directly or indirectly, against anyone who, in good faith, makes an allegation or provides assistance to the committee, management or any other person or group, including any governmental, regulatory or law enforcement, investigating an accounting allegation.
3. The Company shall provide legal protection to whistleblowers for acting in good faith, and where there is reasonable belief that a wrongdoing has occurred.
4. ‘Company’ will not reveal the identity of any person who makes in good faith an allegation and who requests that his/ her identity be kept confidential and shall not make any effort, or tolerate any effort made by any other person or group, to ascertain the identity of the whistle-blower who reported in good faith the accounting allegation anonymously.

4.4. Company Response

1. The RMCC shall determine the appropriate course of action, including the investigation approach and any referral to relevant functions (such as Human Resources, Legal, or Internal Audit), as deemed necessary.
2. The action to be taken by the Company shall depend on the nature and specifics of the concern raised, as determined by the Risk Management and Compliance Committee (“RMCC”).

The matters raised may:

- a) Be referred to Group CEO
 - b) Be investigated internally;
 - c) Be referred to the local police forces;
 - d) Be referred to the external Auditor (expert opinion); or
 - e) Form the subject of an independent inquiry, like an ad-hoc committee etc.
3. In order to protect employees and ‘Company’, initial enquiries will be made to decide whether an investigation is appropriate.
 4. Some concerns may be resolved by agreed action without the need for investigation.
 5. RMCC may instruct formation of a Committee to address some or all of the Whistleblowing Matters, if deemed necessary.
 6. The amount of contact between the persons considering the issues and the whistleblower will depend on the nature of the matters raised, the potential difficulties

involved and the clarity of the information provided. If necessary, further information will be sought from the whistleblower.

7. When any meeting is arranged, the whistle-blower can, or wish to be supported from a Legal Counsel or Senior Management who is not involved in the area of work to which the concerned issue relates.
8. The Company will take steps to minimize any difficulties which the whistle-blower may experience as a result of raising a concern. For instance, if the whistle-blower is required to give evidence in criminal or disciplinary proceedings, a Legal Counsel will provide advice on the procedure.
9. The Company accepts that whistle-blowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, the whistle-blower will receive information/ updates about the outcome of any investigation.
10. A report of the instances reported showing the status and action taken will be presented to the Risk Management and Compliance Committee periodically.

4.5. Creating Whistle Blowing Channels

1. The Company shall establish various communication lines for whistle-blowing like a mention in the website, with contact email, telephone, postal address and the name of the recipient and encourage employees.
2. The Human Resource function will create an awareness of the available channel amongst employees and incorporate it as part of employee handbook.