



Whistleblowing Policy

V01/2018

NOTICE TO READERS

In this document, “UDC” or the “Company”, shall mean United Development Company, its subsidiaries and affiliates, and their respective predecessors and successors.

This policy supersedes any prior policies of UDC or its predecessors, subsidiaries, and affiliates, whether written or oral, on the topics covered herein.

This policy is not to be re-distributed, re-posted on any (public) Internet sites or UDC’s intranet, other than the location referenced herein.

All employees are requested to access this document on the link stated below.

POLICY TITLE: (Whistleblowing Policy)

This document is the property of United Development Company and as such, none of its contents (in whole or in part) may be duplicated or revealed to a third party without the appropriate consent. This policy was endorsed by the Audit Committee and approved by the Board of Directors on 7th of February 2018.

TABLE OF CONTENTS

1. POLICY STATEMENT	5
2. PURPOSE	5
3. SCOPE	5
4. REPORTING OBLIGATIONS	5
5. REPORTING A CONCERN	5

1. Policy Statement

UDC is committed to conduct its business with honesty and integrity and expects its staff to maintain high standards in accordance with its code of conduct & work ethics.

2. Purpose

The Whistle Blowing Policy outlines the principles for the reporting of severe breaches of the code and aims to:

- Enhance UDC transparency and strengthen its controls for combating malpractice.
- Encourage staff or an interested party to report suspected irregularities in good faith without fear of victimization or reprisal even if they were proved to be mistaken.
- Provide staff or interested parties with guidance as to how to raise their concerns.

3. Scope

The Whistleblowing policy applies to all UDC staff and any entity/person conducting business with UDC and its Subsidiaries.

4. Reporting obligations

UDC requires the active support of all interested parties, who are encouraged to report incidents of suspected fraud, corruption, and other serious infringements of the governing regulations.

The Whistleblowing policy does not substitute the Grievance Policy established under UDC HR Policy Manual, yet regulates extremely serious concerns related to the above listed incidents.

Staff have the obligation to cooperate in investigations into such reported incidents. No members of staff or management may use their position to prevent other members from exercising their rights or complying with their obligations as indicated above.

5. Reporting a concern

Staff or other interested party who believe that the Company or any of its employees has engaged in fraudulent or inappropriate acts, is required to directly report the potential violation to the Whistleblowing Officer who is Manager – Internal Audit.

All Whistleblowing disclosures will be treated as confidential, and it is recommended to include detailed information relating to the matter being reported such as dates, involved parties, quantified monetary damages - whenever possible. Provision of details will facilitate a timely review and also enhance the investigation of the case.

Concerns are to be directed to whistleblowing.officer@udcqatar.com. This recipient will swiftly initiate the required procedure.

If the use of the above channel is perceived inappropriate in view of the circumstances (for instance, if there is a conflict of interest or the Manager – Internal Audit is personally implicated in the incidents to be reported, or the Manager – Internal Audit was initially alerted and failed to take appropriate action), the matter may be escalated and reported through whistleblowing.escalation@udcqatar.com. The communication should include on top of the above requirements, a specified reasoning as to why the matter is not directed through Manager – Internal Audit.