

Speak Up Policy

Douglas OHI Corporate Policy

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1. Background

At Douglas OHI, integrity, transparency, and accountability are fundamental to the way we conduct business.

As outlined in the Douglas OHI Code of Ethics and Business Conduct (CEBC), we are committed to operating responsibly, ethically, and in compliance with applicable laws, regulations, and internal policies across all our businesses.

To support this commitment, Douglas OHI has established a Speak Up mechanism that enables employees and external stakeholders to confidentially raise concerns regarding suspected misconduct, unethical behaviour, regulatory breaches, or violations of Douglas OHI policies.

The Speak Up channel provides a safe and trusted way for individuals to report concerns, seek guidance, and help protect the reputation, values, and long-term sustainability of Douglas OHI.

Anyone raising a concern in good faith can expect that:

- Reports will be treated seriously, confidentially, and fairly
- Concerns will be assessed objectively and independently
- The identity of reporting parties will be protected wherever possible
- Retaliation against anyone raising a genuine concern is strictly prohibited
- Persons named in reports will be treated fairly and with a presumption of innocence
- Appropriate corrective action will be taken where misconduct is identified

2. Scope

This Policy applies across Douglas OHI, including all subsidiaries, controlled entities, business units, and operations.

The Speak Up channel is available to:

- Employees
- Former employees
- Directors and officers
- Contractors
- Consultants
- Temporary workers
- Suppliers
- Customers
- Business partners
- Other third parties connected with Douglas OHI

Individuals are encouraged to report any suspected breach involving Douglas OHI employees, representatives, suppliers, partners, or other stakeholders.

This Policy applies to concerns relating to potential breaches of:

- Douglas OHI Code of Ethics and Business Conduct
- Corporate policies and procedures
- Applicable laws and regulations
- Anti-bribery and anti-corruption requirements
- Human rights commitments
- Health, safety, and environmental obligations
- Data privacy and information security requirements

Where local laws or regulations impose additional requirements, those requirements will apply.

3. Speak Up Principles and Protections

Douglas OHI encourages everyone to speak up when they see something that does not align with our values.

A person reporting a concern in good faith will receive the following protections:

Confidentiality

Information relating to reports, investigations, and individuals involved will be handled confidentially and shared only with those who have a legitimate need to know.

Fair and Independent Review

All reports will be assessed objectively and investigated appropriately based on the nature and seriousness of the concern.

Protection from Retaliation

Douglas OHI prohibits retaliation against anyone who raises a concern in good faith. Further details on protection against retaliation are set out in Section 5.

4. Confidentiality and Anonymity

Douglas OHI recognises that individuals may have concerns about reporting misconduct.

Where available, the Speak Up channel enables individuals to report anonymously.

Information provided through the channel will be protected through appropriate security and privacy controls.

The identity of the reporting party, details of the allegation, and information gathered during an investigation will remain confidential unless disclosure is required by law or necessary to complete the investigation.

5. Protection Against Retaliation

Douglas OHI has zero tolerance for retaliation against anyone who raises a concern in good faith.

Retaliation includes any action intended to disadvantage, intimidate, or punish a person because they reported a concern.

Examples may include:

- Threats or harassment
- Unfair treatment
- Discrimination
- Unjustified disciplinary action
- Restricting career opportunities
- Attempts to damage reputation

Any person found to have engaged in retaliation may face disciplinary action, up to and including termination of employment or contractual relationships.

A concern raised in good faith will not result in adverse consequences, even if it is not substantiated.

However, deliberately false, malicious or misleading reports may result in disciplinary action.

6. Rights of Persons Named in Reports

Douglas OHI recognises the importance of fairness throughout the investigation process.

Individuals who are the subject of a report will:

- Be treated fairly and respectfully
- Be presumed innocent unless evidence demonstrates otherwise
- Have their confidentiality protected
- Be given an opportunity to respond where appropriate

Information will only be disclosed when necessary to conduct a fair investigation.

7. Report Management Process

All reports received through the Speak Up channel will be:

- Recorded securely
- Reviewed to determine appropriate action
- Investigated where required
- Closed with appropriate corrective actions

Reports may be:

- Investigated internally
- Reviewed with support from relevant business functions
- Referred to independent external specialists
- Referred to regulatory or enforcement authorities where required

The nature and approach of each investigation will depend on the circumstances of the concern.

8. Investigation and Outcomes

Investigations will be conducted objectively and proportionately.

Investigations may include:

- Review of documents and records
- Interviews with relevant individuals
- Assessment of policies, processes, and controls

Following completion:

- If a concern is substantiated, appropriate corrective, disciplinary, or legal action will be taken.
- If a concern cannot be substantiated, the matter will be closed appropriately.

Where appropriate and legally permitted, reporting parties will receive updates on the progress and outcome of their report.

9. Data Protection and Record Retention

Douglas OHI is committed to protecting personal information collected through the Speak Up process.

Personal data will be:

- Processed lawfully and fairly
- Accessed only by authorised individuals
- Protected through appropriate security measures
- Retained only for as long as necessary

All information management will comply with applicable data protection requirements, including Oman Personal Data Protection Law (Royal Decree 6/2022).

10. Reporting and Governance

The Speak Up process is overseen through Douglas OHI's governance framework.

Reports and relevant trends may be reported to:

- Managing Director
- Executive Leadership Team
- Audit & Risk Committee
- Board of Directors

Reporting will respect confidentiality requirements and protect the identity of individuals involved.

11. Exceptions and Policy Ownership

The owner of this Policy is Corporate Compliance.

Corporate Compliance is responsible for:

- Maintaining this Policy
- Providing guidance and support
- Coordinating investigations
- Promoting awareness and training
- Monitoring effectiveness

Any exceptions to this Policy must be approved through the appropriate governance process.