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|  | BABYLON FAYHAA COMPANY Whistle Blowing Policy | |
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| Title: BFC- Whistle Blowing Policy | | |



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Executive Summary

BABYLON FAYHAA CO. is an Iraqi owned provider for Risk Management and Security Services, Iraq Wide. For all Service Streams. BFC are constantly Horizon Scanning to gather information on trends and influences in their field of expertise. All staff are fully aware of the Grievance Policy and this Whistle Blowing Policy.

Typically, relevant issues might include potential, or actual breaches of Health & Safety Policy, or financial impropriety, where if the issue is not promptly addressed it may grievously affect employee or client safety, or our professional reputation. Personnel can be anonymously if the person or persons concerned do not wish to be named, but at the same time want to make the company aware of something that is not right or could affect the company's operations in the future.

BFC, actively promote, Safety First, in order to lower the risk of any HSE issues or incidents that could have been avoided. With clear policy on reporting near misses. All personnel are encouraged to report any Concerns, especially where safety is concerned, both Internal and External Complaints will always be investigated, reviewed and actioned where necessary. BFC reputation will be upheld if complaints are handled fairly and as quickly as possible, with outcomes promulgated to the relevant parties.

Mechanism

BFC understands the necessary and required procedures for all parties, to report any concerns they may have concerns about. Any actual or suspected or possible organised future wrong doings involving BFC Company or subsidiary operations in any way. Shape or form.

BFC Personnel raising concerns, will know that all companies and concerns are taken seriously and will be fully investigated. Genuine concerns that could disrupt the company's operations or cause reputational damage are greatly received.

All Whistle Blower Reports should be sent to info@babylonfaya.com With a full description of their concerns, Note* If the person(s) chooses to be anonymous then BFC will not be able to inform them of the outcome. However, BFC will always investigate fully.

Reportable Wrong Doings

whistle-blowing purposes 'WRONGDOINGS' can include include, but not limited the following:

- a) Bribery, corruption, fraud or theft.
- b) Criminal Activity
- c) Providing any misleading information or the falsification of financial or other records.
- d) Violations of copyright, patents and licences. Or Data Protection Act
- e) Non-Compliance of health and safety legislation or any Dangerous Act
- f) Non-Compliance of environmental legislation.
- g) Non-Compliance of restraint of trade legislation.
- h) Non-Compliance to comply with other legal obligations.
- i) Non-Compliance with the BFC Code of Ethics, Staff Handbook or Rules for use of Force.
- j) Any breach of International Code of Conduct Association for Private Security Service Providers, 2010.
- k) Failure to adhere to other policies and procedures, including any breaches of financial controls and reporting requirements, and
- l) Concealing or overlooking any of the above.



Scope

BFC Security Services, will abide to this policy, in conjunction with both UK law and Iraqi Law. With considerations for all BFC Personnel Human Rights. Their code of conduct and responsibilities. Following the ICoCA Codes. BFC Personnel should not be apprehensive for particular national Whistle-blowing legislation applicable in Iraq, its company policy that they should report any wrong doings.

BFC operate a formal process for receiving and responding to internal and external grievances. Where confidentiality is needed, BFC whistle-blower **process and procedure is in place**. BFC maintains a fair and robust formal disciplinary process which is used when the Company's Code of Business Ethics and Standards of Conduct is contravened. BFC submit legal process where any judicial solution is required.

Reporting Wrong Doings

1. All BFC Personnel (Employee, Expat Contractor or Consultants,) suspects that there is any wrongdoing or has been asked to take part in some Wrong doing they have a duty to disclose concerns as soon as possible.
2. All information must be made in good faith and be based on a reasonable trust that a wrongdoing has actually or indeed likely to occur. If any investigation reveals there was no wrong doing the employee or persons making the original disclosure will not be subject to any victimisation or disciplinary action. If genuine.
3. Any information that is disclosed that is actually a intended as a malicious act, will not be tolerated and any those making such disclosures will be subject to disciplinary action by and their contract with BFC will be reviewed. Integrity is paramount for all personnel at all levels.
4. Anyone with any concerns or questions relating to any of the "wrong doings" listed above, they can discuss the matter firstly with their Line Manager, or, if the issue relates to the actions of their line manager, who will liaise with the Human Resources Department. However, if this does not resolve the matter or he/she does not deem it appropriate to raise such concerns with their line manager, they should raise their concerns, direct to HR Manager or Compliance Manager All factual evidence and concerns will be investigated and reviewed in a timely manner by:
 - ✓ Managing Director
 - ✓ Compliance Manager
 - ✓ HR Manage
5. Disclosures by BFC Personnel are to be classed as Staff In Confidence and will be maintained as as necessary to investigation of a possible wrongdoing. It may be necessary sometimes to reveal the source of information in order to fully complete an investigation, however this will be under strict rules for access to names and disclose details, other than MD CM HR Manager and HR Administration.
6. BFC Personnel can make a disclosure openly. If Anonymous, it means that disclosures follow-up difficult f and the results cannot be shared with persons or persons that submitted a discloser.
 - a. the disclosure is serious enough and should be taken seriously
 - b. If anonymous it does not harm the credibility of the disclosure; and
 - c. If anonymous it does not impair or prevent the confirmation of details with other sources.
7. Disclosures will always be investigated to identify all the relevant facts as soon as possible and will be carried out by persons with the appropriate experience and authority and who are not directly linked with any aspect of the wrongdoing. The MD will be advised of any whistle-blowing reports received by all sources. The outcome of any whistle-blowing investigation and will record



the proceedings of any whistle-blowing case.

8. When necessary, or required by Iraqi law, a disclosure of a very serious nature, may be referred to an external body for further investigation.
9. The results of an BFC investigation will be communicated to the person or persons or a third party making the disclosure, only if they have agreed to maintain the results in complete confidence.
10. Any concerns with regard to this Whistle-blowing policy, is not being followed, should raise in the first instance, with the compliance manager. Who will review and advise. his immediate superior. In circumstances where it is believed by the Whistle-blowing person that the matter is not receiving adequate attention, for whatever reason, then that person should raise the matter at a more senior level.
11. All Whistle Blower Reports should be sent to info@babylonfayhaa.com With a full description of their concerns, including wrongdoing, Names, Times, Events. All relevant facts.
Note* If the person(s) chooses to be anonymous then BFC will not be able to inform them of the outcome.

Review

This policy is to be reviewed annually by the HR Manager or upon request by CMT Management Team.