etisalat PPF Telecom Group B.V.
Whistleblowing Policy

Version v 1.0

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1. OBJECTIVES AND SCOPE OF THE GLOBAL WHISTLEBLOWING POLICY

etisalat PPF Telecom Group B.V. and its subsidiaries (collectively, the "**etisalat PPF Group**") are committed to the highest possible standards of openness, honesty and accountability. In line with that commitment, etisalat PPF Group expects full time and part time employees and stakeholders that it deals with (including suppliers, customers and third parties), who have serious concerns about any aspect of etisalat PPF Group's work to come forward and voice those concerns also referred to as **"Whistleblowing Reports"**.

The objective of this policy is to promote greater openness in our businesses and to encourage everyone to disclose immediately any wrongdoings that may adversely impact the etisalat PPF Group. In addition, this policy will enable etisalat PPF Group's Audit, Risk & Compliance Committee to discharge its responsibilities of establishing procedures for the receipt, retention, independent investigation and appropriate follow-up action on Whistleblowing Reports received regarding accounting, internal controls, auditing or other etisalat PPF Group matters.

An important aspect of accountability and transparency is a mechanism to enable all individuals to feel confident to voice concerns internally in a responsible and effective manner when they discover information, witness or suspect anything illegal, unethical and/or fraudulent, or otherwise violating the policies of the etisalat PPF Group. Any person raising such a concern shall be referred to as a "**Whistleblower**". Any Whistleblower providing legitimate information in connection to an attempted, suspected and/or actual violation is fully protected by the Policy, the whistleblowing policies issued by the various entities of the etisalat PPF Group, as well as by the laws of the countries in which the etisalat PPF Group operates.

This Group Whistleblowing Policy of the etisalat PPF Group (this "**Policy**") is therefore fundamental to enhance professional integrity and to provide channels for any individual to raise concerns in confidence. It reinforces the value that etisalat PPF Group places on individuals to be honest and respected members of their community. It provides a method of properly addressing bona fide concerns that individuals might have, while also offering Whistleblowers protection from victimization, retaliation, harassment or, in certain circumstances, disciplinary proceedings.

This Policy however prohibits employees and other stakeholders from making Whistleblowing Reports with a malicious intent. Where there are deliberate false allegations, no matter how minor, disciplinary actions will be taken against the Whistleblower.

This Policy applies to all etisalat PPF Group employees, contractors, stakeholders and anyone else who wants to report any matter under this Policy, whether internal or external to the etisalat PPF Group. The whistleblowing policies that exist at the level of the group companies of the etisalat PPF Group, which have been promulgated in accordance with the EU Whistleblowing Directive (EU) 2019/1937 and/or Serbian law, run concurrently with and work in concert with this Policy. In case of a conflict between this Policy and any local laws or regulations, including rules of professional conduct, the rules of the local whistleblowing policies and/or local laws and regulations will prevail over this Policy.

2. AREAS IN WHICH CONCERNS CAN BE RAISED

Specific examples of circumstances where a Whistleblower can raise concerns could include but shall not be limited to:

- Corruption involving conflicts of interest including involvement of any of etisalat PPF Group's entities, any of its directors, or employees in the process of making any decision in the entity in which they or any of their relatives or companies has a personal interest.
- Abuse of authority or exploitation of public office for the purpose of achieving personal interests or benefits for third parties.
- Over-invoicing, demanding, seeking or acceptance of kickbacks, payment for goods or services not supplied or rendered, and/or any act of fraud, bribery and corruption;
- Compromising the interests of etisalat PPF Group in dealings with vendors, contractors, consultants, suppliers, agents, distributors and resellers;
- Financial and administrative corruption or non-financial maladministration or malpractice or fraud that has been/is likely to be committed;
- Forgery of etisalat PPF Group documents and financial instruments like checks and securities;
- Misappropriation of etisalat PPF Group assets (theft or misuse of etisalat funds, inventory and other assets);
- Leakage/unauthorized usage of confidential information;
- Disclosure of business secrets and other confidential information obtained during the course of employment or engagement;
- Misuse of etisalat PPF Group systems or sharing of passwords;
- Non-compliance with internal and/or external laws, regulations, contractual obligations, or policies & procedures of the etisalat PPF Group;
- Engaging in illegal or unlawful acts;
- Misuse of authority;
- Unethical behavior;
- Retaliation against Whistleblowers;
- Discrimination towards any staff member, customers or any stakeholders on any of the grounds specified in the etisalat PPF Group's Diversity, Equity & Inclusion Policy
- Any other form of improper action or Conduct.

It may be more appropriate for a particular concern to be raised by way of another policy or procedure, including etisalat PPF Group's policies, or the policies and procedures issued by the group companies of the etisalat PPF Group. In particular, the channels provided under this Policy should not be used for raising complaints relating to a member of staff's personal circumstances, such as the way they have been treated at work, since there are separate channels available for such complaints.

Whistleblowing Reports received by etisalat PPF Telecom Group B.V. will be assessed by the Chief Legal & Regulatory Officer and, if relevant, will be investigated by the Ethics and Compliance department and/or transferred to another section/department as appropriate (e.g. grievance cases to the HR department, subscription fraud or other related fraud topics to the fraud management team under Finance, etc.). The Chief Legal & Regulatory Officer will also involve appropriate technical resources where the nature of the Whistleblowing Report (e.g., fraud with complex or technological elements) warrants their use.

3. FUNDAMENTAL ELEMENTS OF THIS POLICY:

a. Confidentiality

etisalat PPF Group will make every effort to keep confidential the identity of the individual raising a concern (if so desired by the individual) unless where etisalat PPF Group is required to reveal his/her identity by law.

b. Acting with integrity and in good faith

etisalat PPF Group will act with integrity and in good faith when reviewing or investigating a matter raised by a Whistleblower.

c. Anonymous Whistleblowers

etisalat PPF Group encourages Whistleblowers to disclose their identities whenever possible when raising concerns, although Whistleblowing Reports may be submitted on an anonymous basis. All Whistleblowers, especially anonymous Whistleblowers, should endeavor to provide sufficient corroboratory evidence to justify the commencement of an investigation.

d. Substantiation of reported WB matter

Whistleblowers are strongly encouraged to provide evidence to substantiate reported claims. Evidence examples include but are not limited to pictures, documents, emails, and/or recordings (but must be obtained in compliance with local laws and considering the risk of tipping-off). Where appropriate, the Chief Legal & Regulatory Officer will support the evidence collection process. An investigation of unspecified wrongdoing or broad allegations may not be perused without verifiable evidentiary support.

e. Whistleblower Protection

etisalat PPF Group recognizes that the decision to report a concern is not easy due to the fear of reprisals from those potentially affected. etisalat PPF Group has a zero tolerance towards retaliation against Whistleblowers acting in good faith or persons cooperating during investigations. Whilst all steps will be taken to keep the identity of the individual raising a concern confidential, necessary protective actions will be taken should he/she be identified.

A Whistleblower is subject to retaliation if they are unfairly threatened or subjected to negative consequences mainly due to making a Whistleblowing Report or participating in an investigation. etisalat PPF Group will not tolerate harassment, victimization, retaliation or undue disciplinary action and will take appropriate action to protect a Whistleblower who reports under this policy, even if it turns out not to be true after investigations, provided that:

- The report was made in good faith;
- The Whistleblower had reasonable grounds to believe that all allegations in the report were true; and
- The Whistleblower did not make the report for personal gains.

Retaliation may take many forms, for example, a Whistleblower may be considered subject to retaliation if they are:

- Terminated or downgraded from their existing position;
- Denied a promotion or a fair performance evaluation;
- Subjected to retribution, ostracism or maltreatment;
- Hindered or delayed from completing an official transaction;
- Prevented from pursuing other suitable positions within the organization or externally.

If you have reasonable grounds to believe that you have been threatened or subjected to retaliatory action due to making a Whistleblowing Report or participating in an investigation, you may raise these concerns as per this policy. Your retaliation claim must be made as soon as possible and supported with appropriate facts and evidence reasonably showing that the retaliatory acts were mainly due to your whistleblowing disclosure or cooperation. Your claim will be reviewed under this policy to determine if the reported unfair act was indicative of retaliatory action.

In the event that an employee is also a Whistleblower, protective actions may include formal notifications and follow-up by Human Resources (HR) with the relevant functions to protect the job environment of the Whistleblower and ensure no reprisals take place. Similar protective actions shall be provided to other whistleblowers (e.g. vendors, contractors, suppliers, consultants, agents, distributors and resellers).

4. HOW TO RAISE CONCERNS

Individuals who witness or suspect a potential violation, as explained, can report using any of the following channels:

- By escalating the issue to a direct line manager and/or raising a concern in confidence via other whistleblowing channels, including those at your local group company (please refer to the whistleblowing policy applicable at each such group company for more details), whichever the Whistleblower feels comfortable with.
- By speaking with the etisalat PPF Group Ethics and Compliance teams on any questions you may have regarding the application of this Policy.
- Additionally, you may refer any concerns (1) on an anonymous basis via the official etisalat PPF whistleblower module: https://compliance.etisalatppftelecom.com, (2) to the etisalat PPF Group Ethics and Compliance Department at whistleblower@etisalatppftelecom.com, or (3) by phone to the etisalat PPF Group Chief Legal & Regulatory Officer at +420 725 491 303.
- Only in cases where a concern relates to the key leadership team of the etisalat PPF Group exclusively (consisting of the etisalat PPF Group Chief Executive Officer, Chief Financial Officer, and/or Chief Legal & Regulatory Officer), Whistleblowers may also (1) send their concerns on a confidential or anonymous basis by a letter to the Chairman of the Audit, Risk & Compliance Committee marked “CONFIDENTIAL WHISTLEBLOWING REPORT”, to etisalat PPF Telecom Group B.V., Zuidplein 168, 1077 XV Amsterdam, the Netherlands, (2) to the etisalat Ethics and Compliance Department whistleblowing email address at groupwb@eand.com or (3) by phone to the etisalat whistleblowing hotline at +971 800 2002; or
- Any other channels provided by the Company with respect to this Policy.

5. FURTHER REPORTS

etisalat PPF Group would prefer to be informed first of any Whistleblowing Report but nothing in this policy shall prevent a Whistleblower from reporting directly to any applicable legal or regulatory authorities or enforcement agencies, or professional bodies as required by law.

This would not, however, excuse the disclosure of confidential information except when mandated by law, as such disclosure would normally constitute gross misconduct, which could result in dismissal or other disciplinary action against employees and termination of contract or blacklisting or commencement of legal action in case of vendors, contractors, suppliers, consultants, agents, distributors and resellers.

6. ACCESS AND LOG OF WHISTLEBLOWING REPORTS

The Chief Legal & Regulatory Officer and/or the designated officers of the group companies of the etisalat PPF Group will have access to the Whistleblower channels referred to above and log all Whistleblowing Reports received. All records relating to any reported concerns and the corresponding investigation and resolution will be retained in line with etisalat PPF Group policies.

7. REVIEW OF WHISTLEBLOWING REPORTS

Based on the expected severity, the Chief Legal & Regulatory Officer will assess the operational priority of all received Whistleblowing Reports. Operational priorities may be reassessed at any stage of the investigation and accordingly the priorities may be revised, case may be cancelled/closed and/or transferred to another section/department, as appropriate.

Whistleblowing Reports that are considered as extremely serious in nature or of an independence issue shall be raised to the Chairman of the Audit, Risk and Compliance Committee and/or etisalat PPF Group Chief Executive Officer as appropriate.

8. REPORTING

Investigation reports will be addressed to different management levels and/or Audit, Risk and Compliance Committee as considered appropriate. A summary of all completed cases, along with the status of implementation, will be reported to the Audit, Risk and Compliance Committee on a quarterly and annual basis.

9. FOLLOW-UP

Follow-ups on any item shall be carried out in accordance with standard procedures, as needed.

10. TRAINING AND AWARENESS

etisalat PPF Group will conduct training and awareness sessions to educate and familiarize all employees with this Policy and the whistleblowing policies issued by its group companies, including their rights & responsibilities.

11. REVISIONS

This Policy will be reviewed annually by the Chief Legal & Regulatory Officer and updated as necessary to reflect changes in laws, regulations, and best practices. Relevant updates will be circulated to all concerned parties.

12. POLICY APPROVAL

Recommended by the Audit, Risk and Compliance Committee on 5 December 2025 and approved by the Board of Directors on 5 December 2025.

13. REVISION HISTORY

Ver. No.	Date of Update	Comments	By
1.0	---	First Version	CLRO and Internal Audit

14. RELATED POLICIES AND PROCEDURES

- etisalat PPF Group Code of Conduct
- etisalat PPF Group's Supplier Code of Conduct
- etisalat PPF Group Policies as issued by group companies