



## Whistleblowing Policy

### Introduction

The Whistleblowing Policy has been developed to comply with the Federal Government Anti-Fraud Manual approved by Cabinet Resolution No. (4/11F) of 2018, in order to enhance the control environment at the Federal Authority for Government Human Resources (FAHR). As part of meeting optimal standards of organizational ethics and effective communication, and as part of FAHR's governance, this policy aims to adopt transparency, disclosure, fairness, integrity, responsibility and accountability in order to achieve the higher and broader goal of implementing governance at FAHR. FAHR has developed this policy to ensure that any violation, misconduct or potential risk that FAHR or its stakeholders may be exposed is reported early and addressed appropriately.

### Definitions

Definition	Term
<b>Violation</b>	Any fraud, corruption, collusion, coercion, illegal conduct, misconduct, financial mismanagement, financial or accounting irregularities, conflict of interest, wrongful conduct, irregular or unethical practices, or other violations of laws, resolutions, policies and regulations or covering up any of the above, whether they have occurred or likely to occur.
<b>Fraud</b>	Any illegal act characterized by deception, concealment, or violation of trust that does not rely on the threat of violence or physical force; fraud is committed by individuals or organizations to obtain money, property, or services, or to avoid payment of amounts or loss of services, or to secure personal or commercial benefits for oneself or others.
<b>Stakeholders</b>	Anyone who has an interest in FAHR, such as employees, government entities, suppliers, and service providers.
<b>Unethical Practices</b>	It refers to intentional or unintentional actions and practices that are inconsistent with good morals, harmful to the interests and reputation of FAHR, or inconsistent with approved work standards or professional conduct.

### Policy Objectives

1. Establishing a mechanism that allows everyone who works for FAHR or stakeholders to know the procedures that are followed in submitting their complaints or reporting practices, violations, or transgressions.

2. Creating secure communication channels between the whistle-blower and FAHR to receive and process reports of any violations that have been committed, are being committed, or are about to be committed.
3. Combating fraud, embezzlement, corruption cases, and illegal, unethical or unprofessional behaviour.
4. Ensuring confidentiality and protecting whistle-blowers from retaliation or harm.
5. Promoting responsibility, transparency and accountability, as well as enhancing governance practices and ensuring business continuity.

## Scope of Application

This policy applies to all stakeholders including FAHR's permanent employees, outsourcing staff and any consultants or persons acting in FAHR's name or on its behalf regardless of their positions in FAHR, without exception.

Any individual or group of individuals, whether they are government entities, suppliers, partners or the public, can also report any risks or violations.

## FAHR's Obligations towards Stakeholders

1. Urging stakeholders to report any violation, whether internal or external, related to FAHR.
2. Raising awareness and reassuring stakeholders about the confidentiality of the whistle-blower's identity and the information contained in the report for all stages of processing the report.
3. Providing protection to whistle-blowers from any action against them as stated in the policy.
4. Urging stakeholders not to hesitate to report any violations because they are unsure of the validity of the report and whether or not the allegation can be substantiated. All stakeholders are expected to refrain from rumours, irresponsible behaviour and false allegations. If the allegation is made in good faith but is not confirmed in the investigation, no action will be taken against the whistle-blower.
5. Providing stakeholders with information about all whistleblowing channels, through the means specified in the policy.
6. Raising awareness and urging stakeholders and their responsibility to report any violations related to FAHR of any kind.

## Whistleblowing Cases

FAHR shall urge stakeholders to report what may guide it to correcting an error or procedure, detecting violations, or promoting values. Reporting may be in any of the following situations:

1. Financial and administrative corruption, which is represented by any illegal exploitation of financial and non-financial resources or administrative organization in FAHR.

2. Violation of laws, resolutions, regulations, bylaws and policies that must be followed in accordance with the scope of FAHR's activity.
3. Misuse of FAHR's resources, property, assets, and the like.
4. Misuse of authority and powers or making decisions against the interests of FAHR.
5. Passing irregular operations for FAHR's business, circumventing regulations, or covering up regulatory errors.
6. The existence of conflict of interest in the work or contracts carried out by FAHR that has not been disclosed in a regular manner.
7. Obtaining unentitled benefits.
8. Unauthorized disclosure of confidential information.
9. Bad faith concealment, wilful negligence, destruction of official documents or concealment of fraudulent financial reports.
10. Gross negligence that may result in damage to FAHR.
11. Environmental, health and safety violations.
12. Fraud, deception and theft.
13. Bribery and extortion.
14. Racial discrimination, harassment and bullying.
15. Covering up any of the above-mentioned violations and the like.

## **Whistle-blower Obligations**

Whistle-blower should keep the following in mind :

1. Ensure that reporting is as credible as possible by avoiding rumours and unfounded allegations, and reporting whenever he has real and reasonable suspicion.
2. Avoid malicious reports for the purpose of defamation, entrapment, revenge or retaliation, or to undermine confidence in FAHR or stakeholders.
3. Exercise due diligence to ensure accuracy in reporting violations and clarify all details relevant to the violation as much as possible that would guide to the status of the violation and attach everything that would provide details and evidence of the violation as much as possible.
4. Report the violation as soon as possible.
5. Confidentiality in reporting violation to achieve the interests of FAHR.
6. Take responsibility for malicious allegations if proven for the purpose of discrediting or harming FAHR or a stakeholder.

## **FAHR's Obligations when Receiving A Violation Report**

Upon receiving a violation report, FAHR is committed to the following:

1. Dealing with any report with the necessary seriousness, regardless of the nature of the report, its information or the magnitude of its impact and importance.

2. Take all measures to protect the whistle-blower and not harm him/her in accordance with the policy.
3. Acknowledge the receipt of the report and, if possible, the decision reached.
4. Take the necessary measures to address the violation if proven.
5. Consider the interest of stakeholders.
6. Referring reports to the competent authority for control and investigation work, whether inside or outside FAHR.
7. FAHR shall consider the period of preservation of reports and related documents, including recordings, in accordance with the regulations and instructions.

### **FAHR's Obligations towards the Whistle-blower**

1. FAHR is obligated to protect non-malicious whistle-blowers from any retaliatory action FAHR's employees or stakeholders may take against whistle-blowers, including dismissal, termination of contract, racial discrimination or prejudice.
2. FAHR is committed to not disclosing any information about the person reporting the violation, with the exception of the competent authorities, such as investigation and judicial authorities.
3. Whistle-blowers have the right to report anonymously, however, reporting with the disclosure of identity is encouraged, to ensure proper investigation and assistance if further information is required from the whistle-blower.
4. FAHR is committed to provide an anonymous channel for reporting.

### **Whistleblowing channels**

The Manager of the Internal Audit Office shall be the first line responsible for receiving reports through:

- a) E-mail: [whistleBlowing@fahr.gov.ae](mailto:whistleBlowing@fahr.gov.ae)
- b) Hotline: 04-2319136
- c) Through an interview with FAHR's Internal Audit Manager.

The above-mentioned channels are only accessible to the Internal Audit Office and FAHR's Chairman.

### **Confidentiality of Data and Information**

All data and information provided by whistle-blowers will be kept confidential to the greatest extent possible, consistent with the investigation, and neither FAHR nor any of its employees have the right to disclose or use this information for any purpose other than the requirements of the investigation or if requested by the competent authorities in accordance with their jurisdictions.

## False Reporting and Misuse of Policy

Whistle-blowers should use this policy with the utmost professionalism, as any malicious or false use of the policy may result in legal action being taken against the whistle-blower.

**\*\*\*\*\* End of Policy \*\*\*\*\***