

Policy for Reporting Violations

Approved by Board of Directors

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Introduction

Policy of reporting violations (later referred to as “the policy”) in the National Medical Care Company (later referred to as “the Company”) obligates its managers, officials and employees to comply with high standards of ethical conduct while working and practicing their duties and responsibilities. This policy also ensures that any violation, serious risk or possible misbehavior that could affect the audience, Company or anyone of its staff or clients will be reported in an early stage and treated in the best way possible. The Company’s staff and representatives are all obligated to adhere to the rules of honesty and integrity while performing their responsibilities as well as to comply with all the laws and regulations applicable.

Achieving the highest possible standards of quality, credibility, and openness during all activities is a part of the Company’s commitment.

Objectives

- To encourage the staff to report any unethical matter they are aware of.
- To offer the staff with a confidential way to report unethical matters.
- To provide protection to good faith complainants.
- To elevate the communication and transparency level.

Definitions

Reporting of violation: A procedure followed to report unethical matters within the Company. These could involve any wrongdoings, illicit conduct, or bad financial performance or hazards that threaten the audience or the working environment.

The complainant: The person who reports violations according to this policy. It includes:

- Members of the Board of Directors and the Executive Management as well as those who represent them.
- The staff of the Company and its subordinate units.
- Contractors and sub-contractors.
- Consultants.
- Suppliers.

- Clients.

Disclosure: Any good faith announcement that can reveal or expose information that could prove an unethical or unsound conduct.

Violator: The person whom a disclosure of violation is brought against or whom evidence is collected against during an investigation.

Investigator: A person appointed by the Executive Management after being approved by the Company's Board of Directors. This person, whether from internal auditors, external auditors, consultants or other experts, must have proper experience or information related to the violation itself.

Scope

This policy applies to all employees including permanent and temporary employees as well as contract workers, consultants and anyone acting in the name of the Company or on its behalf. The Company's audience, clients and suppliers are also able to report a violation or risk.

Statement of Violations

This policy encourages reporting any wrong conduct in a correct, fast, and safe manner. The violations include any wrong conduct, financial or criminal violations, violating legal or legislative liabilities or internal regulatory requirements, or any violation that pose a threat on the environmental health and safety.

Violations that should be reported include (but not limited to):

- Illicit conduct, such as bribery or corruption, and wrong acts.
- Bad financial acts, such as claims of false expenses or misuse of resources.
- Possibility of fraud, including losing, hiding, or destroying official documents.
- Any kind of criminal offense whether committed, being committed, or could possibly be committed.
- Non-compliance with internal control policies, regulations and rules or implementing them incorrectly.
- Non-disclosure of conflicts of interest, such as when an individual uses his position in the Company to serve a personal benefit or the personal benefits of others, including individuals with relations to him.

- Obtaining of unearned benefits or rewards from a third party to grant that party unjustified special treatment.
- Unauthorized disclosure of confidential information.
- Manipulation of accounting data.
- Blocking access to clients' credit information or facilitating unauthorized access to clients' information.
- Threatening employees' health and safety.
- Discrimination based on gender, race, disability, or age.
- Violation of the code of professional conduct.
- Unethical conduct.
- Misuse of legal authorities and powers.
- The conspiracy of silence "cover up" with regard to any of the above issues.

Purpose

- This policy is considered an official affirmation for the Company's commitment to the highest standards of professional integrity, ethical conduct, transparency and fair treatment throughout its practices.
- This policy aims to provide a way to deal with the actual concerns and fears of the complainants, while providing them with appropriate protection from possible acts of retaliation, harassment and/or disciplinary procedures.
- The policy of reporting violations also aims to encourage and enable colleagues to express their fears and concerns within the Company instead of neglecting the problem or reporting the violation outside the Company.
- This policy is compatible with the Company's corporate values and code of conduct. Therefore, this process is aimed at addressing transparency and accountability at the organizational and individual responsibility levels by encouraging individuals to report offenses and violations in the workplace in a responsible and ethical manner.

Guarantees

This policy allows employees to report violations and ensures that they are not subjected to retaliation or abuse as a result. The policy also ensures that the employee is not at risk of losing



his/her job or any form of penalty as a result of reporting any violation, provided that the violation is reported in good faith and that the employee has honest and reasonable suspicion.

For employee's personal protection, the following guarantees were provided:

Abuse: According to this policy, abuse due to reporting violations will not be tolerated.

Confidentiality: Every effort will be made to ensure the confidentiality and secrecy of the identity of the complainant.

Anonymous allegations: This policy encourages employees to disclose their names with any report of violation because investigation of the violation and follow-up may not be possible unless the source of the information is identified. Yet, complaints that do not include the name of the complainant will still be handled properly.

Bad faith: Reporting a violation in bad faith may result in disciplinary action against the complainant.

Statement of Confidentiality

This policy encourages all employees to report any violations in a fair and honest manner. However, if the staff member asks for anonymity, it shall not be done without his consent, unless otherwise provided by regulations. But, in certain cases, the identity of the complainant must be disclosed. For example, the need for identification before any external party or competent court. The employee shall also maintain the confidentiality of the communication submitted by him and not disclose it to any employee or other person.

Procedures for Reporting a Violation

Complainant

- The role of the person reporting the violation is to provide reliable information in his communication. The person is not required or expected to act as an investigator or fact-seeker, nor is he required to identify appropriate corrective action.
- Complainants should not act on their own in conducting any investigation activities.
- Complainants may report the violations without disclosing their identity, however, the company encourages the complainant to put his name when possible. As an exception, in some cases the identity of the complainant must be disclosed to determine the authenticity of the violation. Complainant may be present as a witness regarding such cases.



- If the complainant reports a violation in good faith, but without being confirmed through investigation, no action is taken against him.
- If the complainant is reporting a violation for purpose of entertaining, trapping others, or for personal gain, disciplinary action may be taken against him.
- To ensure that the complaint has been received by the concerned.

Complaint Reporting

- Submit the complaint directly to the company's compliance officer.
- The sooner a complaint is reported, the easier it will be to take the appropriate action in the right time.
- An employee must be able to prove that he has submitted the complaint in good faith, although the employee is not required to verify the complaint.
 - The complaint shall be submitted in writing (according to the attached form) by:
 - * E-mail: (under management Compliance officer only, as posted on the company's website)
 - Send an email to the company's compliance officer
 - The following postal address:
 - Company Compliance Officer

Complaint Processing:

The action taken against any complaint of any violation in accordance with this Policy shall depend on the nature of the complaint itself. This may require an informal review, internal audit or formal investigation. The following steps are taken to address any complaints:

- The Compliance Officer shall inform the Chairman and CEO of the Company (if the notification is not directed against the latter) on the content of the complaint within two business days of receipt of the complaint.
- An initial review is carried out to determine whether an investigation should be conducted and what form it should take. Some communications may be resolved without the need for an investigation.
- The internal audit team of the company determines whether the violation is a matter of concern that necessitates an investigation or not and finalizes the decision to the executive management of the company. If the decision is an investigation, they should take into account the violator and the extent of the seriousness of the alleged mistake.
- Suspected violator shall be informed with alleged allegations at the beginning of the formal investigation, with the opportunity to express their views and opinions during the investigation.

- Suspected violator will have the opportunity to respond to the substantive findings of the investigation report unless there are compelling reasons for doing so. The allegation of the complaint against the reported person will not be supported unless there is a good evidence to support that claim.
- The investigation may be transferred to a competent third party when necessary.
- The complainant shall be provided within five working days by notification of receipt of the complaint and a telephone number for communication.
- If the complaint is found to be unjustified, no further investigation shall be conducted and the decision shall be final and irrevocable unless further evidence of the complaint is provided.
- - If it turns out that the reporting is based on cases of fraud and financial impact, the audit committee shall be informed of this and the necessary action to be taken by the relevant party.
- - The Audit Committee shall submit its recommendations to the President of the Council for approval and accreditation.
- - The disciplinary procedures resulting from the violation shall be determined according to the company's human resources policy and the working system in force.
- Where possible, the complainant may be provided with information on any investigation. However, the complainant may not be informed of any disciplinary or other action which may result in the company's breach of confidentiality obligations towards another person.
- - The company is committed to deal with the complaint in a fair and appropriate manner, but does not ensure that the method of handling the complaint is consistent with the wishes of the applicant.
- All records relating to complaints shall be kept by the Compliance Officer of the Company.



Complaint Reporting Form

Complainant Information (this section may not be filled out if you do not wish to be identified)

Name Job Number.....

Position Administration Phone Number..... E-mail Address.....

Suspected Violator Information

Name..... Position Administration..... Telephone Number..... E-mail Address.....

Witness Information (if any)

Name functional number Position Administration Telephone number..... E-mail address

Details: Nature and type of violation

.....
.....
.....

Name of Suspected violator.....

Date of committing the violation and the date of knowing it.....
.....

Where the violation occurred

.....

Are there evidences to prove that the violation was committed?

.....

Names of other persons involved in the commission of the violation

.....

Any information or other details about the offense

.....

Any other observations

.....
.....

Date:

Signature: