

WHISTLE BLOWING POLICY



Sohar Steel

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00	29-OCT-17	First Issue
Revision	Date	Description

WHISTLE BLOWING POLICY

Sohar steel is an organization with strong values, we are governed by the values of Honesty, Integrity, Creativity, Innovation and Quality.

Sohar steel requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Sohar steel, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistle-blower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Sohar steel can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Sohar steel's code of ethics or suspected violations of law or regulations that govern Sohar steel's operations.

No Retaliation

It is contrary to the values of Sohar steel for anyone to retaliate against any Top management, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Sohar steel. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

Sohar steel has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their department In-charges /Manager. If you are not comfortable speaking with your department In-charges /Manager or you are not satisfied with your department In-charges /Manager's response, you are encouraged to speak with COO/ CEO/ Director.

Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Sohar steel's Compliance Officer who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the CEO or any Directors or the organization's Compliance Officer

Compliance Officer

The Sohar steel's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the CEO /Director(s) of all complaints and their resolution and will report at least annually to the Chair of the Finance Committee/Audit Committee on compliance activity relating to accounting or alleged financial improprieties.

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Accounting and Auditing Matters

The Sohar steel's Compliance Officer shall immediately notify the Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Sohar steel's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Documentation Procedure

All reports of concerns, complaints or breaches received shall be logged including details such as date, time and place of complaints, nature of the complaints, details of investigation/actions conducted and conclusion.

Log should be maintained for a period of 10 years with access restricted to top management

Compliance Officer: CEO

Mr. Ramesh Gopal

Chief Executive Officer, Sohar Steel LLC

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References/Supporting Documents

Code of Ethics

Approved by CEO 