

**Ample Pro**

**Whistleblower Policy**

# Table of Contents

## 1. Introduction

- Overview of the Company's commitment to ethics and integrity and the application of the Whistleblower Policy.

## 2. Purpose

- Encouraging reporting of suspected or actual wrongful conduct.
- Providing a confidential process for handling complaints.
- Protecting whistleblowers from retaliation.
- Ensuring proper investigation and resolution of concerns.

## 3. Scope

- Types of wrongful conduct covered by the policy, including:
  - Fraud and financial misconduct
  - Bribery and corruption
  - Violations of laws or regulations
  - Harassment or discrimination
  - Health and safety violations
  - Environmental violations
  - Other unethical conduct

## 4. Reporting Mechanisms

- Confidential Hotline
- Secure Email
- Direct Reporting

## 5. Confidentiality

- Ensuring the confidentiality of reports and protecting whistleblower identity.

## 6. Protection Against Retaliation

- Prohibiting retaliation against individuals who report concerns in good faith.

## 7. Investigation Process

- Acknowledgment of reports
- Conducting an impartial investigation

- Communicating the outcome to the whistleblower (if known)

#### 8. Anonymity

- Option to report anonymously and the implications for investigation.

#### 9. Employee Training

- Regular Training
- Role-Specific Training

#### 10. Compliance with Local and International Laws

- Compliance with U.S. laws, including the Sarbanes-Oxley Act, and relevant laws in Dubai.

#### 11. Policy Review and Updates

- Annual review and update of the Whistleblower Policy.

# 1. Introduction

Ample Pro Inc. (“the Company”) is committed to maintaining the highest standards of ethics and integrity in all of its operations. To support this commitment, the Company has established this Whistleblower Policy to encourage employees and other stakeholders to report any concerns regarding illegal, unethical, or improper conduct without fear of retaliation. This policy applies to all employees, officers, directors, contractors, suppliers, and other stakeholders in all locations where the Company operates, including the United States and Dubai.

## 2. Purpose

The purpose of this Whistleblower Policy is to:

- Encourage employees and other stakeholders to report suspected or actual wrongful conduct.
- Provide a transparent and confidential process for handling whistleblower complaints.
- Protect whistleblowers from retaliation or discrimination.
- Ensure that reported concerns are properly investigated and resolved.

## 3. Scope

This policy applies to reports of wrongful conduct, including but not limited to:

- **Fraud and financial misconduct:** Theft, embezzlement, financial statement fraud, or other forms of financial malfeasance.
- **Bribery and corruption:** Offering or accepting bribes, kickbacks, or any other form of improper payment.
- **Violations of laws or regulations:** Any activity that violates local, national, or international laws, including anti-bribery, anti-corruption, and anti-money laundering laws.
- **Harassment or discrimination:** Any form of workplace harassment or discrimination based on race, color, gender, sexual orientation, religion, age, disability, or nationality.
- **Health and safety violations:** Any practices that endanger the health and safety of employees or the public.
- **Environmental violations:** Non-compliance with environmental regulations or practices that harm the environment.

- **Other unethical conduct:** Any conduct that is inconsistent with the Company's Code of Ethics or other internal policies.

## 4. Reporting Mechanisms

The Company provides several channels for reporting concerns:

- **Confidential Hotline:** A confidential hotline managed by an independent third party, available 24/7 for reporting concerns. This hotline is accessible from both the U.S. and Dubai.
- **Secure Email:** A dedicated and secure email address where employees and stakeholders can submit reports confidentially.
- **Direct Reporting:** Employees may also report concerns directly to their supervisor, the Compliance Officer, or the Legal Department. For those in Dubai, reports can be made to the designated local compliance contact.

## 5. Confidentiality

All reports will be treated with the utmost confidentiality. The identity of the whistleblower will be protected to the fullest extent possible, consistent with the need to conduct a thorough investigation and comply with applicable laws.

## 6. Protection Against Retaliation

The Company strictly prohibits any form of retaliation against individuals who report concerns in good faith. Retaliation includes, but is not limited to, termination, demotion, harassment, or any other adverse employment action. Any employee found to have engaged in retaliatory behavior will be subject to disciplinary action, up to and including termination of employment.

## 7. Investigation Process

- **Acknowledgment:** Upon receipt of a report, the Company will acknowledge it and initiate a preliminary assessment to determine whether a formal investigation is warranted.
- **Investigation:** If warranted, an impartial investigation will be conducted by the Compliance Officer, Legal Department, or an independent third party. The investigation will be conducted promptly and thoroughly.
- **Outcome:** Upon completion of the investigation, appropriate corrective actions will be taken, and the whistleblower, if their identity is known, will be informed of the outcome to the extent possible.

## 8. Anonymity

Reports can be made anonymously. However, providing contact information is encouraged to facilitate a more effective investigation. Anonymous reports will be investigated to the extent possible, but anonymity may limit the ability to fully address the reported concerns.

## 9. Employee Training

- **Regular Training:** The Company will provide regular training on this Whistleblower Policy to all employees, emphasizing the importance of reporting misconduct and the protections available to whistleblowers.
- **Role-Specific Training:** Additional training will be provided to managers and supervisors to ensure they understand their responsibilities in handling whistleblower reports.

## 10. Compliance with Local and International Laws

This Whistleblower Policy is designed to comply with all applicable laws and regulations in the United States, including the Sarbanes-Oxley Act, and relevant laws in Dubai. The Company will review and update this policy regularly to ensure continued compliance with all applicable legal requirements.

## **11. Policy Review and Updates**

This Whistleblower Policy will be reviewed annually by the Company's Compliance Officer and updated as necessary to reflect changes in the law, regulatory expectations, or the Company's business operations, including its expansion into Dubai.

---

By implementing this Whistleblower Policy, Ample Pro Inc. ensures a transparent, ethical, and safe environment for its employees and stakeholders, both in the United States and Dubai. This policy supports the Company's commitment to ethical business practices and encourages the reporting of any misconduct or unethical behavior.