

BUSINESS INTEGRITY AND ETHICS

Whistleblowing and Non-Retaliation Policy

Safe, confidential ways to raise concerns, and protection for everyone who does.

Date 22 October 2026
Reference AC-CMP-POL-003 · Revision 00
To All employees, temporary personnel, contractors and subcontractors working for or on behalf of Accenti LLC

Issue of the Whistleblowing and Non-Retaliation Policy, AC-CMP-POL-003, Revision 00

Dear colleagues,

I am pleased to issue the Accenti Whistleblowing and Non-Retaliation Policy, effective 22 October 2026. It applies to employees, contractors, suppliers and anyone else who wishes to raise a concern about Accenti.

Problems that are raised early can be fixed. Problems that stay hidden become safety incidents, losses and lost trust. I want everyone to feel safe telling us when something is wrong.

Any concern raised in good faith will be taken seriously and handled confidentially. No one will lose their job or be treated unfairly for speaking up, and anyone who retaliates against a person who has will face disciplinary action.

If you see something, say something. Compliance is mandatory.

Yours sincerely,



Ali Ahmed Dhadhaow
Chief Executive Officer
Accenti LLC



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WEB

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DEFENSE INFRASTRUCTURE

MISSION SUPPORT

Whistleblowing and Non-Retaliation Policy

DOCUMENT	REVISION	EFFECTIVE	STATUS
AC-CMP-POL-003	00	22 Oct 2026	Approved / Issued
APPROVAL AUTHORITY	POLICY OWNER		
Accenti LLC Management	Finance Department (Compliance)		
APPROVED BY	APPROVED ON	NEXT REVIEW	
Ali Ahmed Dhadhaow, Chief Executive Officer	22 Oct 2026	22 Oct 2027	

Controlled document. Approval is evidenced by the signed and sealed cover letter. The current revision is held by Finance (Compliance); printed copies are uncontrolled.

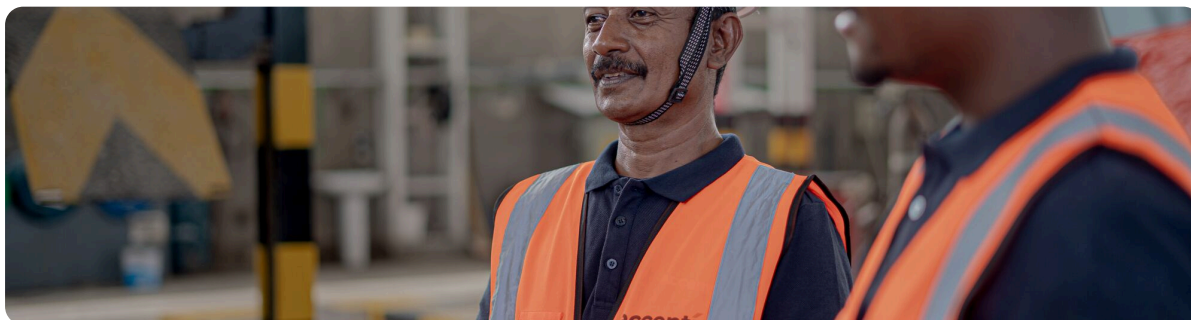
Accenti LLC encourages anyone to raise concerns about wrongdoing, and protects everyone who does so in good faith from retaliation.

1 Application

This policy applies to employees, temporary personnel, contractors, suppliers, clients and members of the public. It covers concerns about any breach of law or of Accenti policy.

2 What can be reported

- | | |
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| 01 Bribery, fraud or theft. | 06 Falsified records or inspections. |
| 02 Health, safety or environmental danger. | 07 Conflicts of interest. |
| 03 Sexual exploitation, abuse or harassment. | 08 Breaches of sanctions or export controls. |
| 04 Child labour, forced labour or trafficking. | 09 Retaliation against a reporter. |
| 05 Discrimination or bullying. | 10 Any other breach of law or policy. |



— Concerns raised early, handled confidentially and acted on.

3 How to raise a concern

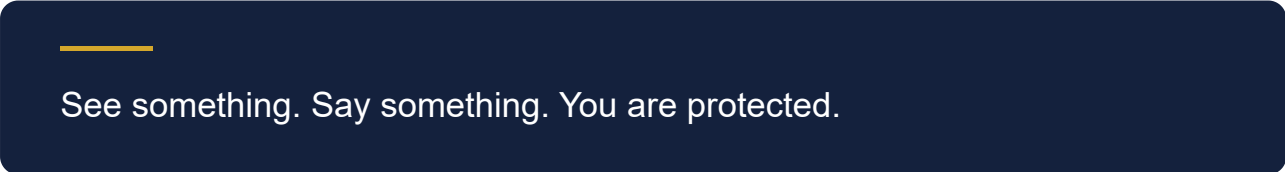
- 3.1 Channels. A concern may be raised with a line manager, Human Resources, Finance (Compliance) or directly with the Chief Executive Officer, in person, by phone or in writing.
 - 3.2 Anonymity. Concerns may be raised anonymously. Giving a contact route helps us investigate and give feedback.
 - 3.3 Confidentiality. The identity of the reporter shall be shared only with those who need to know to investigate, unless the law requires otherwise.
 - 3.4 Investigation. Every concern shall be acknowledged, assessed and, where warranted, investigated by someone independent of the matter. The reporter shall be told the outcome where appropriate.
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4 Protection from retaliation

No person shall be dismissed, demoted, disciplined, harassed or otherwise disadvantaged for raising a concern in good faith, even if it proves unfounded. Retaliation is a disciplinary offence. Knowingly false reports made to cause harm are also a disciplinary offence.

5 Responsibilities and review

Finance (Compliance) shall maintain a confidential register of concerns and report themes to management. Managers shall receive concerns respectfully and pass them on. This policy shall be reviewed at least annually.



See something. Say something. You are protected.

Questions about this policy?

Concerns can be raised with Finance (Compliance), Human Resources or directly with the Chief Executive Officer, in person, by phone or in writing.

Operations — Somalia

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Headquarters

United Arab Emirates

Contact

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Policy owner

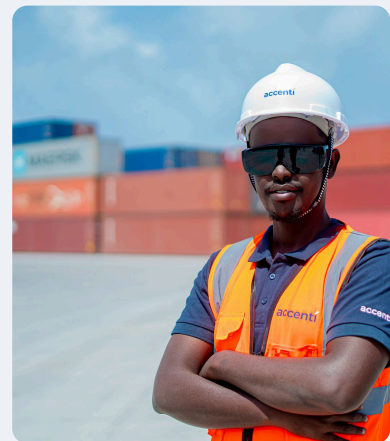
Finance Department (Compliance)
AC-CMP-POL-003 · Revision 00

■ On every site

Speak up safely

Raise a concern through any channel in this policy. You will not be penalised for a report made in good faith, even if it turns out to be mistaken.

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Zero harm to people, property and the environment.

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