



RAISING CONCERNS / WHISTLEBLOWING POLICY

Brief Scope: This Policy sets out a process whereby SATORP regular employees, secondees and supplemental manpower (SMP) may raise concerns regarding misconduct that may have an effect on SATORP, SATORP staff members or third parties with whom SATORP does business.

			Name and Signature	
Rev	Date	Modification description	Prepared by	Approved by
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1	02/06/2015	Review & update in contact details	GA	BAC

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	SAUDI ARAMCO TOTAL REFINING & PETROCHEMICAL COMPANY	ISSUER: Internal Audit Date: 02/06/2015
	Raising Concerns / Whistleblowing Policy	Rev: 1 0-IAUD-003

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1 Applicability, Purpose and Scope

This Raising Concerns / Whistleblowing Policy (the **Policy**) applies to all SATORP members, including, regulars, SMPs and secondees (collectively, **SATORP Personnel**).

SATORP is committed to achieving the highest possible standards of quality, honesty and accountability in all of its practices. The **Policy** is designed to assist you in identifying and raising a concern you may have about misconduct (as defined below) that may affect SATORP's operations, reputation or business relationships, in the right way and without any fear of reprisal.

Misconduct means:

- A violation of any laws or regulations applicable to SATORP's operations.
- Financial or administrative misconduct including falsification of any records or reports.
- A violation of any of SATORP's Articles of Association, policies, procedures, standards and rules or such other similar mandatory directive.
- Misuse of SATORP property or assets in instances where use of the property or asset is unauthorized or excessive.
- Any other conduct that a reasonable person would know is not appropriate for SATORP's business or operations, including, without limitation, mistreatment of fellow personnel, crimes, fraud, theft, misuse of SATORP's assets and matters relating to SATORP's Conflict of Interest and Business Ethics (COI &BE), Policy & Disclosure, and the Business Integrity Guide (the **Integrity Guide**).

This Policy is primarily designed for Misconduct concerns where SATORP's interests may be at risk. If you have a concern regarding your employment-or a work related issue, then please use the Grievance Procedure, details of which also available from the SATORP Human Resources Department.

This Policy applies to any Misconduct that might arise inside or outside the Company (without geographical restriction) which may have direct or indirect consequences for SATORP's operations, reputation or business relationships.

From time to time you may have concerns about a Misconduct. Normally these concerns are easily resolved; however it may be difficult to know what the appropriate response should be in each circumstance. You may have concerns about raising any issues, perhaps feeling it's none of your business or that it's only a suspicion. You may also feel that raising a concern regarding a Misconduct might jeopardize your career or appear disloyal to your colleagues, Managers or to SATORP. You may decide to say something only to find that you have spoken to the wrong person, or raised the issue in the wrong way, and you may not be sure of the appropriate next steps. This Policy is meant to assist you in this regard.

SATORP has designed this Policy to assist you in appropriately raising concerns about Misconduct at any time and in the right way.

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It is always preferable that you raise a concern over Misconduct as early as possible, rather than to investigate it yourself. This Policy is designed to protect you from reprisals by colleagues for speaking out about Misconduct. Raising Misconduct concerns is always in the best interest of every stakeholder of SATORP. Not reporting a Misconduct could be interpreted by other SATORP Personnel as a signal that SATORP's policies and procedures, including its accounting and control procedures may be ignored whenever they are inconvenient.

If you are concerned about Misconduct, which you think should be known or investigated by the General Auditor, please follow the guidelines set forth herein. This Policy explains the reporting options always available and open to all SATORP Personnel.

This Policy along with the Business Integrity Guide supports SATORP's Conflicts of Interest, Business Ethics (COI &BE), Policy & Disclosure, which must be read and signed by all SATORP Personnel as a requisite for working at or with SATORP. Copies of these documents are available from the SATORP Human Resources Department.

2 Reporting Responsibilities

SATORP Personnel at all levels are expected to bring in confidence to the attention of the General Auditor any situation which suggests the possibility of Misconduct, including matters relating to conflicts of interest of which SATORP Personnel have knowledge.

In reporting any Misconduct, SATORP Personnel are also required to be based on facts (i.e., not rumor and mere allegations), candid (i.e., honest and truthful), objective (i.e., avoiding personal differences) and accurate (i.e., clear and complete) with the General Auditor at all times and not conceal, or attempt to conceal, any relevant information.

Not reporting a Misconduct or doing so inappropriately (i.e., malicious, false, or incorrect allegations) could constitute a form of Misconduct as defined in this Policy and may subject the person(s) involved to further disciplinary action.

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3 How to Raise a Misconduct Concern Internally

SATORP Personnel may report their concerns in confidence directly to the General Auditor through any of the following means:

Hotline: Speak directly to General Auditor by calling +966 (13) 356-9267
E-mail: Contact the General Auditor at: general.auditor@satorp.com
Fax: +966 (13) 356-9632
Postal: SATORP, Attention: General Auditor, 4048–Unit No. 1, Al Jubail 35741 – 7821, Kingdom of Saudi Arabia

***Note:** When reporting a Misconduct concern, please indicate that you are raising such a concern under this Policy.*

4 SATORP’s Assurances to You

Your protection and our assurance

Provided you are acting in **good faith**, under this Policy, if you raise a Misconduct concern it does not matter if you are mistaken, you will not be at risk of suffering any form of retribution from SATORP as a result.

However, if you have personally been involved in the Misconduct, raising it as a concern under this Policy will not provide you with any immunity for such Misconduct. However, SATORP will take into account your help in coming forward and raising your own Misconduct when determining appropriate next steps that do not violate the laws and regulations of the Kingdom of Saudi Arabia.

SATORP will not tolerate the harassment of any SATORP Personnel raising a Misconduct concern. Deterring, or victimizing, any SATORP Personnel who has raised, or about to raise, a Misconduct concern will be treated as a disciplinary issue.

Any SATORP Personnel who abuses this Policy in **bad faith** by maliciously raising a Misconduct concern that they know to be false will be subject to disciplinary action by SATORP.

***Note:** SATORP may not notify or inform you of the steps taken in any investigation or the results of any investigation of a reported Misconduct.*

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Your confidence

With these assurances, SATORP hopes that you will feel secure in openly raising your Misconduct concern. However, SATORP also recognizes that there may be circumstances when you would prefer to raise a Misconduct concern in private or anonymously. If you ask us not to disclose your identity without your consent, SATORP will not do so unless required by law. You should also be aware that there may be times when SATORP is unable to resolve a concern without revealing your identity (e.g., where your personal evidence is essential). In such Misconduct cases, SATORP will discuss with you whether and how the matter might best proceed.

Please keep in mind that if you choose to raise a Misconduct concern anonymously it will be more difficult to address the Misconduct, protect your position or to give you feedback. Accordingly, you should not assume SATORP can provide the assurances described above if you do not tell us who you are when raising your Misconduct concern.

5 Your Assistance

It is only with your help that SATORP is able to maintain the culture of high standards and ethics that we all expect. We truly hope that this Policy does give you the strong reassurance you may need to raise any concern of Misconduct at any time.

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