

BP-POL-003

Speak-Up & Whistleblowing Policy

Confidential reporting, fair investigations, feedback and protection from retaliation

Speaking up is a service to Blue Palm. Concerns are heard, handled fairly and protected from retaliation — whether they prove right or not.

VERSION	1.0
STATUS	Approved
POLICY OWNER	Nominated Compliance Officer – Mr. Hiua Schuani
APPROVAL AUTHORITY	Managing Director – Mr. Hiua Schuani
APPLIES TO	Blue Palm personnel and relevant third parties in Federal Iraq, the Kurdistan Region and the UAE/Dubai

1. Purpose

This policy gives employees, contractors, suppliers and other stakeholders safe routes to raise suspected wrongdoing, risk or concealment. Early reporting allows Blue Palm to protect people, customers and the business, correct problems and cooperate with competent authorities.

2. What may be reported

- Bribery, fraud, theft, sanctions evasion, money laundering, conflicts of interest or falsified records.
- Child labour, forced labour, trafficking, recruitment fees, passport retention, wage abuse or unsafe working conditions.
- Discrimination, harassment, bullying, violence, retaliation or abuse of authority.
- Food safety, product integrity, substitution, quality, environmental or public-health risks.
- Breach of law, licence, contract, Blue Palm policy, or deliberate concealment of any of these matters.

A personal employment grievance may be raised through the normal manager or HR/management route, but this policy may be used where the issue also involves wrongdoing, risk, retaliation, a conflict of interest or a wider public or workforce concern.

3. Reporting channels

Channel	When to use
Nominated Compliance Officer	Normal confidential route: dedicated email, telephone or in-person appointment stated in the local reporting notice.
Managing Director / Owner	Use when the Compliance Officer is involved, unavailable or the reporter reasonably believes independence is compromised.
Independent external adviser	Use when both internal routes are conflicted or when Blue Palm designates an external recipient for sensitive matters.
Emergency or competent authority	Use immediately for imminent danger or where direct external reporting is required or protected by law. This policy does not restrict lawful reporting to an authority, court, regulator, trade union or adviser.

4. How reports are handled

1. **Receive and protect:** record the report securely, limit access and consider immediate safety, evidence and retaliation controls.
2. **Acknowledge:** where contact is possible, acknowledge within seven calendar days and explain the next step.
3. **Triage:** assess urgency, conflicts, legal privilege, data protection, reporting duties and the appropriate investigator, normally within seven working days.
4. **Investigate fairly:** define scope, preserve records, hear relevant people, test evidence and maintain impartiality. The subject of an allegation is treated fairly and no conclusion is assumed.
5. **Decide and remediate:** document findings on the balance appropriate to an internal process; take corrective, disciplinary, contractual, safety or reporting action.

6. **Provide feedback:** where lawful and practicable, give proportionate feedback within three months of acknowledgement without disclosing confidential personnel or legal information.
7. **Close and follow up:** record the outcome, protect records, monitor retaliation and verify agreed corrective action.

5. Confidentiality and anonymity

Blue Palm will protect the reporter's identity and information that could reveal it, sharing only with people who need it to assess or address the concern or where disclosure is required by law. Absolute confidentiality cannot be guaranteed if due process, safety or law requires disclosure; the reporter will be informed in advance where lawful and practicable.

Anonymous concerns will be assessed on the available facts. Blue Palm will not try to identify an anonymous reporter except where strictly necessary and lawful to address serious misuse of the channel.

6. Protection against retaliation

- No dismissal, demotion, pay or hours disadvantage, threat, intimidation, harassment, blacklisting, adverse reference, contract loss or other detriment because of a protected report or cooperation.
- Managers must escalate suspected retaliation immediately and put interim protections in place.
- A reporter remains accountable for unrelated misconduct or poor performance, but action must be independently reviewed to ensure it is not retaliatory.
- Support may include a different reporting line, work location or schedule, paid time for interviews, welfare support or an independent contact, without penalising the reporter.

7. External reporting and emergencies

Nothing in this policy prevents lawful communication with police, courts, labour authorities, the Federal Commission of Integrity, Dubai Economic Security Centre or another competent authority. In the Kurdistan Region, labour grievances may also be directed to the competent KRG labour authority; the KRG publicised hotline 5500 for worker complaints in 2026. Individuals should seek independent legal advice if unsure about confidentiality or external disclosure.

An imminent threat to life, safety, product safety or security must be reported immediately through the local emergency route as well as the appropriate Blue Palm channel.

Roles and responsibilities

Role	Core responsibility
Managing Director	Approves the policy; sets the tone; authorises high-risk exceptions or relationships; ensures adequate resources and independent escalation.
Nominated Compliance Officer	Maintains the legal register, advice channel, risk records and registers; coordinates training, screening, investigations and annual review.
Managers and supervisors	Apply the controls in daily decisions, create a respectful environment, prevent retaliation and escalate concerns without delay.
All workers	Read and follow the policy, complete required training, keep accurate records, ask when unsure and report suspected breaches.

Role	Core responsibility
Report recipient / investigator	Declares conflicts, protects confidentiality, follows a fair scope, records evidence and outcomes, and escalates legal or safety issues.
Person named in a report	Receives fair treatment, may respond to material allegations at the appropriate stage, preserves evidence and must not retaliate.
Third parties	May use published channels and must not retaliate against their workers or others for reporting Blue Palm-related concerns.

Training, records and monitoring

Training

Induction must cover the parts of this policy relevant to each role. Refresher training is required at least annually for exposed roles and when a material change occurs. Training may be brief and practical, but attendance and comprehension must be recorded.

Minimum records

- Secure report register with access restricted by role.
- Acknowledgement, triage, investigation plan, evidence, outcome and corrective-action record.
- Retaliation risk assessment and follow-up; external reporting or legal advice where applicable.

Proportionate indicators

- Acknowledgements within seven days and feedback within three months where possible.
- Open cases by age and overdue corrective actions.
- Substantiated retaliation concerns and protective actions.
- Themes and control improvements reported without identifying individuals.

Records must be accurate, access-controlled and retained for the period required by applicable law, contract and Blue Palm's retention schedule. Personal data and sensitive reports must be restricted to those with a legitimate need to know.

Breaches, protection and review

A breach may result in corrective action or discipline up to and including dismissal, subject to applicable law and a fair process. Third-party breaches may lead to remediation plans, suspension, termination, recovery of loss and reporting to a competent authority where required.

Blue Palm prohibits retaliation against anyone who raises a concern, assists an investigation or refuses conduct they reasonably believe would breach law or this policy. Deliberately false or malicious allegations may be addressed through a fair disciplinary process; a concern that is not substantiated is not, by itself, misconduct.

The Nominated Compliance Officer will review this policy at least annually, after a significant incident, and when relevant law, sanctions, licensing conditions or operations change. Material changes require Managing Director approval.

Legal and standards reference

This section is a concise implementation map, not a complete statement of the law. The current official text, local legal advice and the applicable entity or licence conditions must be checked before relying on a provision.

Instrument	Relevance to this policy
Iraq Law No. 58 of 2017 on the Protection of Witnesses, Experts, Informants and Victims	Provides a statutory protection framework in specified Iraqi proceedings; Blue Palm extends internal non-retaliation beyond that statutory scope.
Dubai Law No. 4 of 2016 Establishing the Dubai Economic Security Centre, Article 19	Protects qualifying informers concerning matters affecting Dubai's economic security; it is not treated here as a complete private-sector whistleblowing code. official/source text
Federal Iraq Labour Law No. 37 of 2015	Protects labour rights and provides complaint routes for specified workplace breaches. official/source text

Voluntary European and international benchmarks

EU Whistleblowing Directive (EU) 2019/1937 — [source](#)