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## Whistle-Blower Policy

This Whistleblower Policy (the “Policy”) has been developed in keeping with Dumas Contracting Ltd.’s commitment to the highest standards of ethical conduct and integrity. It is intended to encourage and enable employees of Dumas Contracting Ltd. (the “Corporation”) to raise concerns about violations or perceived violations of the Business Code of Conduct and Ethics without fear of harassment or retaliation. This Policy establishes procedures for: (a) the receipt, retention and treatment of complaints regarding questionable financial reporting, accounting, internal controls, auditing matters (collectively “Accounting Matters”); and (b) the submission by employees of the Corporation, or any other member of the public, on a confidential, anonymous basis, of concerns regarding fraud, non-compliance with safety procedures, breaches of the Code of Business Conduct and Ethics or any improprieties relating to the Corporation’s operations in general (collectively “Operational Matters”). This Policy is complimentary to the Corporation’s Code of Business Conduct and Ethics.

### 1. Reporting Procedure

All complaints will be handled confidentially and in accordance with the Corporation’s Privacy Policy in effect from time to time, and all applicable laws. If a complaint is made anonymously, the Corporation will maintain anonymity to the extent possible, in order to ensure a thorough investigation can be conducted. All complaints should contain sufficient detail of the alleged improper conduct to permit a complete examination of the issue. Upon receipt of a complaint, an assessment will be made as to whether the conduct in question is improper or violates any of the Corporation’s policies, including but not limited to the Business Code of Conduct and Ethics, and warrants sanction. If an employee would like to discuss any matter with the Audit Committee, the employee should include this request in the submission as well. Certain complaints may be handled at the supervisory level where deemed appropriate by the Audit Committee.

Complaints or concerns regarding both Accounting Matters and Operational Matters should be submitted in writing in a sealed envelope to the Chair of the Audit Committee (the “Chair”) of the Corporation, as follows:

In Writing: Personal and Confidential

The Chair of the Audit Committee  
Dammstrasse 19  
6300 Zug, Switzerland

+41 41 560 9070

Email: [dumasauditcommittee@pala.com](mailto:dumasauditcommittee@pala.com)

## **2. No Adverse Consequences**

The submission of a concern regarding Accounting Matters or Operational Matters may be made by an officer or employee of the Corporation without fear of dismissal, disciplinary action or retaliation of any kind. The Company will not discharge, discipline, demote, suspend, threaten or in any manner discriminate against any officer or employee with respect to reporting done in good faith, for the best interests of the Corporation, and not for personal gain. Malicious allegations may result in disciplinary action.

## **3. Review of Submissions**

Concerns will be reviewed and addressed as soon as possible by the Audit Committee in the manner deemed to be appropriate based upon the merits of the submission and with the assistance and direction of whomever the Audit Committee thinks appropriate, which may include external legal counsel. The Audit Committee shall implement any corrective measures it deems necessary to address the concern based upon the merits of the submission.

Notice of any corrective measures taken will be communicated to the person who submitted the complaint, where possible and when considered appropriate by the Audit Committee in its sole discretion.

## **4. Retention of Records**

The Audit Committee shall retain records relating to any concern or report of a retaliatory act and to the investigation of any such report for a period of no less than seven years. The types of records to be retained by the Audit Committee shall include records of all steps taken in connection with the investigation and the results of any such investigation.

#### **5. Review of Policy**

The Audit Committee will review and evaluate this Policy on an annual basis to determine whether the Policy is effective in providing appropriate procedures to report violations or complaints regarding Accounting Matters and Operational Matters. The Audit Committee will submit any recommended changes to the Board for approval.

#### **6. Inquiries**

Any questions about how this Policy should be followed in a particular case should be forwarded to the Chair of the Audit Committee or General Counsel.