

**Whistleblower Protection Policy
At Land Department and its Institutions**

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1. Introduction

On 26 Rajab 1379 AH, corresponding to 24/01/1960, the late Sheikh Rashid bin Saeed Al Maktoum, Ruler of Dubai, initiated the launch and establishment of Dubai Land Department. Since its foundation in 1960 until the establishment of the State of the Union, the Land Department was chaired by Sheikh Maktoum bin Rashid Al Maktoum, succeeded by Sheikh Mohammed bin Khalifa Al Maktoum in 1971, who is still its chairman to date.

The Land Department adopts corporate governance policy, which assists in decision-making and definition of responsibilities and provides a certain framework to establish a sense of responsibility for the Department and its customers. The Land Department has a regular set of relationships with its customers and all other stakeholders. The general framework of corporate governance ensures fair treatment based on equality among all customers and recognizes all rights of landlords defined by the law.

Within this framework, the Land Department has pursued corporate governance standards based on effective communication, management of (financial, technical and human) resources and operations management to ensure efficiency in performance and organizational structure and proper regulation of responsibilities and relationships to ensure wise leadership. The Land Department embraces transparency, disclosure, justice, integrity, responsibility and accountability so as to achieve the supreme and broader intended goal of the application of corporate governance at the Land Department, i.e. good governance.

LD whistleblowing policy and procedures for reporting violations instruct LD directors, officers and employees to adhere to high standards on the level of personal morals in the course of employment and exercising their reporting duties and responsibilities. The whistleblower protection policy (hereinafter referred to as the "Policy") ensures the protection of the whistleblower from any damage that may be incurred to him as a result of reporting any potential act that may be suffered by the customers, LD, any of its customers or employees and addressing this act appropriately.

All LD staff and representatives must observe the rules of honesty and integrity in the performance of their responsibilities and comply with all applicable laws and regulations. LD is committed to achieving the highest possible quality, credibility and openness standards in the exercise of all of its activities in application of the corporate governance methodology.

2. Definitions

Term	Definition
Whistleblower Protection Policy	Approach adopted by LD to protect whistleblowers.
Whistleblowing Policy	The approach adopted by LD in receiving reports of violations, unethical issues, and fraud.
LD	Land Department
Institutions	RERA, Dubai Real Estate Institute, Dispute Resolution Center
Departments	All departments and administrative and organizational units affiliated to LD and its institutions.
Director General:	Director General of LD
Senior Management:	Deputy General Manager, Assistant General Manager.
Orbit Team:	Senior management, executives, heads of institutions, sector managers.
Corporate Governance:	An integrated system of policies and rules for the control and guidance at the institutional level that determines the responsibilities, rights and relations between the owner and senior leadership with the departments, customers, partners, suppliers, and human resources, and monitors the procedural and financial decision-making to ensure the achievement of institutional integrity, combat corruption in the work environment, support justice, transparency and institutional accountability and enhance trust and credibility to achieve good governance.
Whistleblower	A person who reports fraud or other unethical issues within LD, as well as among stakeholders and entities that are engaged in business with LD, including without limitation, all customers, partners, suppliers, the

	community (public), and the agents of third parties and their representatives.
Violations	Malpractices, including any criminal or financial violations, breach of any legal or regulatory obligations or internal organizational requirements or any acts that pose a threat to health, safety or environment.
Unethical Issues:	Intentional or unintentional acts or practices that are contrary to morals, harm reputation, lack equity or do not conform with the approved labor standards at LD or proper professional or social behavior.
Fraud:	An unethical, irregular or illegal act or practice characterized by dishonesty and the premeditated intention to conceal a fact, either in words, acts or counterfeiting, which would result in financial or non-financial loss to LD. It includes erroneous accounting practices or false financial reporting with fraud intention.
Integrity:	Treating everyone fairly and without discrimination or bias and acting professionally and objectively in public affairs management and in relationship with others.
Whistleblowing:	A process adopted for reporting any violations, fraud, unethical issues within LD.

3. Purpose of the Whistleblower Protection Policy

LD is committed to developing an integrated framework for whistleblower protection. The main objective of this policy is to ensure that no (staff or customer) sustains any potential damage, in the present or future, and protect them from any harm as a result of reporting any violations, fraud, or unethical issues.

4. Scope of the Whistleblower Protection Policy:

This policy applies to LD and its institutions, departments, employees and customers. This policy does not apply to the posts that are not governed by the Human Resources Law No. 26 of 2007, as amended.

5. Whistleblower Protection

LD is committed to ensuring the protection of whistleblowers who are covered by LD Whistleblowing Policy through the detection of violations, ensuring full confidentiality and dealing with the report covered by this policy based on specific and credible information or documents, without violation of any ethical rules recognized by LD:

5.1 A whistleblower will have the following protection:

1. Provide him with the necessary protection at the location of his work and ensure that he does not suffer any discrimination and mistreatment.
2. Non-disclosure of information concerning his identity and whereabouts.
3. No whistleblower will be considered to have violated the provisions of the legislation, agreements and representations related to disclosure of confidential information, whether in the entity for which the whistleblower works or deals with, unless the report is false.

5.2 Damage or injury from which the whistleblower may be protected:

1. Revenge, harassment or persecution by other employees
2. Bias against the whistleblower (staff /customers) (internally/externally) in the present or the future
3. Loss of opportunity for promotion
4. Dismissal

6. Roles and Responsibilities for Whistleblower Protection:

6.1 Director General

- Adopt the policy in accordance with the applicable procedures.
- Refer the reports presented to him by the regulators on a certain report to the Violations Committee for investigation.
- Take decision on an employee who caused the damage, according to rules, procedures, regulations and laws. The Director General may form a special committee to investigate the facts of the damage. The members of the Committee will include the Director of the Control and Risk Assessment Department, Director of

Human Resources Department, and a legal adviser. The decisions of this committee will be effective without referral to the Violations Committee.

6.2 Director of Human Resources Department

- Ongoing review to assess the performance of whistleblower employees and make sure they are not subjected to any damage or career harm.
- In general, protect the whistleblower from any potential career damage.
- Provide a quarterly report for senior management to comment on the nature and extent of the damage incurred by the employee as a result of reporting any committed violations, unethical issues, and fraud and present basic guidance and the satisfactory conclusions that have been concluded.

6.3 Director of the Control and Risk Assessment Department

- Implement and update the appropriate regulations and controls to ensure the application of the policy and propose and develop necessary procedures to be effectively implemented at LD level.
- Upgrade the Whistleblower Protection Policy every three years, or whenever necessary, and adopt this policy by the Director General.
- Verify the damage incident if it occurs to any whistleblower employee and report this incident to the Director General.
- Coordinate with the Human Resources Department to update the regulations related to violations, as well as whistleblower protection procedures.

6.4 Orbit Team/Department Managers

- Ensure the communication of this policy to all of their staff.
- Ensure that the person reporting any unacceptable conduct does not suffer any damage.
- Consider all reports presented to them as serious and fully confidential.

6.5 Employees/Customers

- Ensure that no damage or harm is incurred to the person who reports an unacceptable conduct.
- The employee involvement in any conduct that causes damage to

the whistleblower as a result of reporting any unacceptable conduct will be considered to violate this policy and will lead to taking disciplinary measures against this employee.

7. Confidential Information and Data

All data and information provided by the Whistleblower will be confidential. Neither LD nor any of its employees may disclose such information or use it for any purpose other than the intended purposes.

8. Penalty of Policy Violation

According to the list of offenses and sanctions applicable at LD.

9. Effective Date of the Policy:

This policy will take effect in early 2017 and will be periodically reviewed every three years and whenever necessary.

Sultan Batti Bin Mejren
Director General of Dubai Land Department