

# Sustainability Risk Management

Salik cultivates a culture where risk management, business continuity, and resilience are integrated into its operations. This approach is reinforced by technologies with built-in continuity capabilities and an organisational commitment to embedding risk management, response, and recovery protocols across all levels.

Salik follows a comprehensive approach to Enterprise Risk Management (ERM), business continuity management, and crisis response. The Board of Directors establishes the Company's risk appetite, defining acceptable risk levels across all business units and types of risk.

The ERM Policy standardises processes for identifying, documenting, and communicating risks. This policy is implemented across all levels of the organisation, ensuring that risks are managed within the risk appetite defined by the Board. A dedicated management committee monitors these risks, including those related to critical vendor and third-party relationships.

The materiality assessment and the resultant focus areas driving Salik's ESG Strategy provide the context for Salik's sustainability risk management. Managing these risks is an integral part of Salik's ERM process. An aggregated view of Salik's top risks includes key risks pertaining to these material aspects, which are reviewed by executive management and reported quarterly to the Board of Directors. The Audit Committee independently assesses these risks to maintain oversight and ensure timely interventions. Additionally, the Company conducts emerging risk workshops for employees and performs risk analyses for revenue diversification projects. Risks associated with toll gates construction, as and when required, are evaluated on a project-by-project basis.

Salik operates a 'three lines of defence' model to delineate roles and responsibilities for risk management and compliance:

1. Business and process owners who manage risks and are responsible for implementing day-to-day controls.
2. Functions that support management in monitoring risks and controls, providing expertise, guidance, and process improvements.
3. The Internal Audit function, which operates independently to review the effectiveness of governance, risk management, and internal controls, assuring senior management and the Board.



# Business Ethics and Compliance

Salik positions business ethics as a daily discipline that protects trust in a regulated environment and safeguards the Company's reputation. The Company promotes a 'speak-up' culture built on openness, transparency, integrity and accountability.

Ethics and integrity are treated as non-negotiable operating principles at Salik, with clear accountability across the Company to uphold ethical business practices. This commitment is anchored in a Board-approved [Code of Conduct](#), which sets the baseline for ethical and personal behaviour and frames integrity as essential to protecting Salik's culture, reputation, and relationships with shareholders, business partners, and the wider community.

Oversight of the Code is embedded in governance. The Compliance Section supports compliance with applicable laws and regulations, develops and reviews related policies, and maintains channels for confidentially raising concerns. The Internal Audit Section provides independent assurance and reports to the Board and the Audit Committee as needed.

Salik has a strong anti-fraud governance based on the Fraud Control Policy. It sets out a structured model covering governance, prevention, detection, and response, supported by controls such as screening, third-party due diligence, conflict-of-interest declarations, access restrictions, and periodic control reviews.

In 2025, employees received awareness training on Salik's corporate ethics policies and procedures and recorded zero breaches or violations related to corruption or bribery, discrimination, harassment, customer privacy data, conflicts of interest, fraud, money laundering, or insider trading.

Salik does not make any contributions or donations that could constitute bribery or corruption. In 2025, the Company also made zero contributions to or expenditures for political campaigns, political organisations, lobbyists, lobbying organisations, trade associations, or other tax-exempt groups. These activities are prohibited under the UAE law.

## Anti-corruption and whistleblowing

Salik maintains a strict stance against business ethics violations, including bribery, corruption, and fraud. Employees are prohibited from offering, soliciting, or accepting bribes or engaging in corrupt practices. Anti-corruption due diligence is applied to new business partners and is overseen by the procurement team.

The Whistleblowing Policy is designed to detect unethical, corrupt, or illegal conduct and to support sound governance by enabling concerns to be raised without fear of retaliation. It applies not only to employees but also to a wide range of external parties interacting with Salik, such as suppliers, contractors, consultants, and service providers. Reports can be made openly or anonymously and are handled confidentially to the extent possible. Whistleblowers are protected from adverse action, such as demotion, harassment, or discrimination, for raising a concern or cooperating with an investigation.

Should you have any concerns or wish to report corruption incidents or fraudulent activity, please use one of the following reporting channels:

- Compliance and Ethics Hotline +971-523181299
- Email [IAC@salik.ae](mailto:IAC@salik.ae)

→ [Whistleblowing Portal](#)

### Salik obtained ISO 37001 certification for its Anti-Bribery Management System (ABMS)

The certification followed an independent assessment of the Company’s anti-bribery and anti-fraud framework, aligned with relevant governance expectations for listed entities, including CMA and DFM requirements and the UAE Companies Law.

ISO 37001 is an international standard that sets requirements for establishing, implementing, and continuously improving

an anti-bribery management system. For Salik, certification strengthens the consistency of anti-bribery controls across operations, reinforces accountability within the compliance framework, and supports a structured approach to preventing, detecting, and addressing bribery risks, including through clear escalation and investigation processes.

## Conflicts of Interest

The Company’s approach to this topic is preventative: it focuses on early identification, transparent disclosure, and active management of both actual and perceived conflicts.

Salik’s Conflict of Interest Policy provides practical guidance for identifying situations that may give rise to conflicts and establishes measures to prevent them, while clarifying the responsibilities of Salik and those working for or with the Company when conflicts arise. In addition, conflict of interest requirements are also reflected in the Company’s Articles of Association. The policy requires Directors and employees to avoid situations in which personal, business, or financial interests could, or be perceived to, influence their duties and decisions. When an actual or potential conflict exists, it is expected to be disclosed promptly, removed or avoided wherever possible, and the involved person should step away from related discussions and decisions.

The policy, aligned with relevant UAE legislation and the CMA’s corporate governance regulations, establishes procedural safeguards to protect the integrity of decision-making. Salik maintains a dedicated register to document declared conflicts and the mitigating measures taken. Directors are under an enhanced duty to disclose conflicts as soon as they arise and to abstain from relevant deliberations and voting, with the Board able to structure discussions to preserve independence and quorum where required.

**0** conflicts of interest were reported in 2025.

## Tax Compliance

Salik applies a systematic approach to tax compliance supported by internal controls and external validation. Tax reporting is completed with the support of tax consultants, while the Finance Department, led by the Financial Controller, conducts regular reviews to ensure accurate accounting and tax remittance before filing via the Federal Tax Authority (FTA) portal. External auditors and tax consultants validate compliance with regulatory standards, and Salik maintains transparent communication with the FTA regarding filings and information requirements.

Given the current VAT profile, monitoring focuses on service revenues, with close attention to accruals and revenue recognition. The Financial Controller maintains regular communication with the Chief Financial Officer and promptly updates him on any developments related to tax compliance.

## Ethics and Compliance Training

Ethics and compliance expectations are reinforced through structured learning. Salik implements a Compliance & Ethics Learning and Development Plan, approved by the Audit Committee, with initiatives spanning Code of Conduct workshops, information security and gifts-related compliance training, simulated phishing exercises, and ISO 37301 certification as a marker of compliance excellence. Training is repeated regularly to address changes in legislation and emerging risks related to corruption, fraud, and other relevant topics.

# Human Rights

Salik’s human rights approach is grounded in respect and fairness across its operations and value chain. The Company commits to comply with applicable UAE regulations while seeking to follow international human rights standards.

Salik’s Human Rights Policy applies across the Company and extends to all employees, regardless of grade, as well as the Board of Directors. It also extends to suppliers and partners across Salik’s value chain. To support awareness and consistent application, the Policy is communicated to employees internally and is publicly available on Salik’s website.

The Policy aligns with international frameworks, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and applicable UAE regulations. Key commitments include:

- Zero tolerance for forced or compulsory labour, child labour, and modern slavery.

- Providing equal pay for equal work.
- Promoting diversity and inclusion.
- Creating a workplace free from harassment, intimidation, and discrimination.
- Maintaining safe and healthy working conditions.
- Supporting fair work hours, wages, and benefits, with salaries paid through the UAE Wages Protection System.
- Upholding the rights of People of Determination.
- Ensuring that suppliers and third parties adhere to ethical sourcing practices, environmental standards, and labour law compliance requirements.

## Human Rights Due Diligence

Salik operationalises its policy commitment through a structured Human Rights Due Diligence (HRDD) procedure aligned with the UNGPs’ ‘corporate responsibility to respect’ approach. HRDD covers Salik’s own activities and business relationships and extends to partners and entities across the value chain, including suppliers, service providers, consultants, contractors, and subcontractors, as well as customers and the communities in which Salik operates. It prioritises topics relevant to the Company’s operating context and value chain, including forced labour, migrant worker welfare, discrimination, health and safety, and data privacy.

The HRDD process is designed to identify, prevent, and mitigate potential adverse impacts and to demonstrate accountability through regular monitoring and reporting. The procedure is structured around five connected elements.

1. Human Rights Impact Assessment
2. Ongoing assessment of human rights risks
3. Value chain assessment
4. Oversight and grievance handling
5. Monitoring, reporting, and improvement

→ [For further detail, refer to the Human rights DDP.](#)

→ [For further detail, refer to the HRDD report.](#)

Human rights mitigation measures are embedded within Company policies, supplier requirements, and grievance mechanisms and apply across Salik’s workforce and operating activities. In the event of an adverse human rights impact, Salik maintains established remediation processes, including confidential reporting channels, investigation procedures, corrective actions, and access to remedy, in line with its [Human Rights Policy](#) and [Whistleblower Policy](#).

### 2025 HRDD assessment

In 2025, Salik completed its first HRDD assessment, covering relevant business units and value chain elements, including supplier ESG screening, and supported by established grievance mechanisms. No material human rights concerns were identified during the reporting period. Salik will continue to implement its HRDD framework in the coming years to uphold its commitment to responsible business conduct and respect for human rights. For further details, refer to the Human Rights Due Diligence Report.