



WHISTLE BLOWING POLICY

Effective Date: 07/01/2025

Approved By: Management , Peak International Trading Co LLC

1. Purpose and Scope

The purpose of this Whistle blowing Policy ("Policy") is to provide a structured, safe, and confidential frame work for internal and external stakeholders of **PEAK INTERNATIONAL TRADING CO. LLC** to report unethical, illegal, or suspicious behavior that may have occurred in the past, is currently occurring, or may occur in the future.

This Policy ensures that reports can be made without fear of retaliation, discrimination, or harm. It supports the Company's commitment to uphold legal compliance, ethical conduct, transparency, and accountability in all business operations.

This Policy applies to all Company employees (including management and the Board of Directors), contractors, suppliers, customers, external stakeholders, and business partners.

2. Definitions

- **Whistle blow:** A report, concern, complaint, or suggestion made to alert the Company about actual or suspected misconduct, violations of law or company policy, unethical behavior, or threats to health, safety, or the environment.
- **Notifying Party (Whistle blower):** Any person, internal or external to the Company, who reports a concern under this Policy. This includes employees, former employees, suppliers, customers, contractors, and business partners.
- **Internal Stakeholders:** Employees, management, and board members who work with in or directly represent the Company.
- **External Stakeholders:** Individuals or entities such as customers, vendors, regulators, or community groups that are affected by or impact the Company's operations.
- **Business Partners:** All entities the Company works with, including dealers, agents, consultants, distributors, or joint ventures.
- **Retaliation:** Any adverse action taken against a Whistle blower for reporting a concern, including demotion, dismissal, harassment, or discrimination.
- **Investigation:** A formal process initiated to examine the facts surrounding a report, gather evidence, interview witnesses, and determine out comes.

3. General Principles

PEAK INTERNATIONAL TRADING CO. LLC adheres to the highest standards of integrity, transparency, and ethical conduct. The Company fosters a culture of **open communication** and encourages reporting of any misconduct to protect the organization and its stakeholders.

All stakeholders are expected to report conduct that:

- Violates local or international law
- Contravenes the Company's internal rules, procedures, or ethical principles
- Endangers public health, safety, or the environment
- Harms the reputation or sustainability of the Company

The Company strictly prohibits any form of retaliation against individuals who make reports in good faith.

4. Whistle blowing Subjects

The following issues, whether perpetrated by internal or external stakeholders, are examples of reportable misconduct under this Policy:

- **Legal Violations:**
 - Breach of national or international laws, regulations, or standards
 - Non-compliance with industry-specific laws (e.g., trade, financial, environmental)
- **Criminal Activities:**
 - Fraud, bribery, corruption, theft, money laundering
 - Document falsification, abuse of trust or forgery
 - Sexual harassment, physical assault, abuse
- **Ethical Violations:**
 - Discrimination, harassment, bullying or abuse
 - Misuse of company resources
 - Conflict of interest or abuse of authority
- **Reputation and Policy Risks:**
 - Breach of responsible sourcing policies (e.g., precious metals)
 - Concealment or aiding of policy violations
 - Actions damaging to the Company's brand or stakeholder trust
- **Safety and Environmental Concerns:**
 - Unsafe working conditions or practices
 - Environmental pollution or neglect
 - Negligence in complying with safety regulations
- **Regulatory Compliance Failures:**
 - Violations of anti-corruption, anti-money laundering, data protection laws
 - Breach of financial market regulations
 - Failure to comply with economic sanctions or embargoes

5. Whistle blowing Methods

Stakeholders may report any misconduct or suspicious situation through the following communication channels:

Official Reporting Channels:

- **Email:** compliance@peakintltrading.com
- **Phone:** +971 43426029
- **Mailing Address:**
309 Gold Land Building , Deira
DUBAI/ UAE

6. Structure and Content of Reports

To assist in a clear and effective investigation, the Notifying Party is encouraged to include the following information (to the extent known):

- Identity and role of the person(s) involved
- Date, time, and location of the event(s)
- Whether the event is recurring or isolated
- Witnesses or other individuals who may know about the issue
- Whether the issue was previously reported or handled
- Degree of personal involvement or observation
- Supporting documents, materials, or evidence

Anonymous reports are accepted; however, providing identifying details may help expedite and deepen the investigation.

7. Whistle blowing Investigation

All reports received will be assessed promptly and fairly. If the report falls within the scope of this Policy, a formal investigation will be initiated by the Legal and Compliance Department or a designated independent authority.

The investigation will involve:

- Reviewing the report's content
- Collecting and verifying evidence
- Interviewing relevant parties
- Recommending appropriate action or corrective measures

Investigations will remain confidential and neutral. The final outcome may not always be shared in full due to privacy and legal restrictions, but Whistle blowers will be updated where appropriate.

8. Confidentiality

The confidentiality of Whistle blowers and investigation participants is a top priority.

The Whistle blower may choose:

1. **Full anonymity** (no name or contact shared)
2. **Limited confidentiality** (identity shared only with authorized personnel)

All information, including the identity of involved persons and details of the case, is handled on a strictly need-to-know basis.

Any one involved in the investigation must:

- Keep all details confidential
- Protect the identity and privacy of all parties
- Not discuss the case with unauthorized individuals

9. No Retaliation Guarantee

PEAK INTERNATIONAL TRADING CO. LLC strictly prohibits retaliation against any individual who reports concerns in **good faith**, regardless of whether the report is ultimately substantiated.

Protections include:

- No dismissal or demotion
- No discrimination or disciplinary action
- No professional disadvantage or threat

If retaliation is proven, disciplinary action will be taken against the retaliator.

However, if a report is found to be deliberately false, malicious, or made for personal gain, the Notifying Party may be subject to disciplinary or legal action.

10. Protection of Personal Data

The Company processes personal data obtained during investigations in accordance with:

- Applicable personal data protection legislation
- The Company's internal Data Protection Policy

Only data necessary for the investigation and validation of claims is processed. Data may be anonymized where appropriate and is stored securely to prevent unauthorized access.

11. Policy Ownership, Review, and Revision

This Policy is owned and overseen by the **Management**, who are responsible for ensuring it remains up-to-date and effective.

Review Process:

- **Compliance Department** prepares revisions as needed
- All updates must be approved by the **Management**
- The Policy is reviewed **annually** or sooner if legal or operational changes require it

12. Effective Date

This Whistle blowing Policy becomes effective on the date of its formal approval by the Management and remains in force until amended or replaced.

This Policy entered into force upon the approval of the Management on 07.01.2025

Signed:

Sercan Samet Onder

General Manager

Signature:

Peak International Trading Co LLC

07/01/2025



Prepared By Vishnu Shaji

Designation : Compliance Officer

Signature: 

Peak International Trading Co LLC

07/01/2025