



Guide to Whistleblowing

01. Which body of rules regulates workplace whistleblowing procedures and the status of whistleblowers?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Egypt does not have a comprehensive whistleblowing law. However, specific legislation provides protection for whistleblowers or informers under certain circumstances, as detailed below. Generally, Egyptian laws require and encourage citizens to report any crimes or violations they witness. These laws ensure that individuals are protected and not harmed by the same. There have been ongoing efforts and discussions about strengthening protections for whistleblowers, but comprehensive and specific local whistleblower protection laws have not yet been fully established.

In this regard, and while neither the old labour law no. 12 of 2003 (“**Old Labour Law**”), nor the new Egyptian labour law no. 14 of 2025, issued on 5 May 2025 and which entered into force as of the first of September 2025 – replacing the Old Labour Law in its entirety (the “**New Labour Law**”) – include specific regulations and procedures for whistleblowing. However, the New Labour Law introduced stricter provisions on employers to ensure a safe workplace environment for its employees. The New Labour Law included a clear obligation on employers to safeguard their workplace against forced labour, sexual harassment, bullying, and workplace violence. In this regard, it mandates that employers have clear complaint mechanisms and disciplinary actions.

The New Labour Law stipulates a forthcoming ministerial decree will be issued to outline the scope of applicability of the foregoing restriction and determine the rules and procedures necessary for submitting complaints, ways to resolve them, and taking the necessary measures in their respect. We anticipate that such decree will provide further regulations concerning whistleblowing and the methods of reporting within a workplace.

Notwithstanding the above, the ministerial decrees previously issued in implementation of the Old Labour Law are still effective, as long as they do not include any provision that contradicts with the New Labour Law. In this respect, the Ministerial Decree no. 185 of 2003 (the “**Ministerial Decree**”)[1] establishes that direct supervisors who fail to report workplace violations related to their duties should be subject to disciplinary action starting from a three days’ salary deduction with the highest (at the fourth occurrence) being a demotion to a lower grade without prejudice to the

salary. Further, guards, doormen and supervisors are fully and personally liable for enforcing certain provisions within their respective roles. They are required to promptly notify the appropriate authorities of any assaults they experience in the course of their duties. These provisions include those related to employee inspections and the management of product and asset entries and exits, irrespective of their value.

We understand that the Egyptian Parliament is currently reviewing a draft law on the protection of whistleblowers and witnesses.

Additionally, we set out below some other provisions which provide guidance on whistleblowing:

- The Constitution – Article 96 of the Egyptian Constitution guarantees the protection of witnesses, accused persons, whistleblowers and victims, when necessary and in accordance with the law. We understand that the government has recently been adopting a secured system for anonymous reporting, whereby it encourages any person to report any corrupt acts or violations witnessed, without fears as well as to ensure protection of whistleblowers during all stages of reviewing their complaints before all competent authorities;
- Criminal Procedures Code no. 150 of 1950 (“**CPC**”) – any person who becomes aware of a crime for which the public prosecution may file a lawsuit without a complaint or request is entitled to report it. Additionally, the CPC obliges public employees and those entrusted with public services who become aware of a crime – during or as a result of their work – for which the public prosecution may file a lawsuit without a complaint or request to immediately report such crime to the public prosecution or the nearest police officer;
- Law no. 30 of 2023 – this law grants financial incentives for individuals who, among others, report or assist in the discovery of tax evasion incidents;
- Law no. 102 of 1983 – this law grants financial incentives for individuals who report or assist in the discovery of environmental offenses within nature reserves;
- Law no. 3 of 2005 on the Protection of Competition and the Prohibition of Monopolistic Practices (as amended) this law grants full immunity from criminal liability to the first violator who reports the offense to the competent authority, provided they submit sufficient evidence enabling the authorities to uncover and prove the violation. Subsequent violators who cooperate with the investigation may benefit from partial leniency or reduced penalties, subject to the court’s discretion;
- The National Anti-Corruption Strategy 2023-2030 – The Administrative Control Authority (ACA) has been actively combating corruption and overcoming challenges to justice, through the formulation and implementation of national anti-corruption strategies, raising awareness about the harmful effects of corruption, and encouraging the reporting of crimes and violations in alignment with Egypt’s Vision 2030 and international anti-corruption conventions. The National Strategy is founded on key principles, including:
 - Transparency – providing clear and timely access to data, information, and documents to support anti-corruption efforts;
 - Participation – promoting the expression of opinions and reporting of corruption to anti-corruption agencies;
 - International Conventions – Egypt has ratified several conventions such as the UN Convention Against Corruption (UNCAC), the Arab Anti-Corruption Convention and the African Union Convention on Preventing and Combating Corruption. These conventions impose obligations to implement appropriate protective measures for whistleblowers acting in good faith.

- Governance Guidelines by the Central Bank of Egypt (CBE) – the CBE requires banks to adopt a whistleblowing policy approved by their board of directors. This policy must set out clear rules to:
 - protect whistleblowers against intimidation or retaliation;
 - establish procedures for handling complaints;
 - ensure proper documentation and record-keeping; and
 - define mechanisms and timelines for resolving reported issues.
 - Guidelines by the Financial Regulatory Authority (FRA) – as per the FRA’s Decree no. 77 of 2025, the FRA requires companies and entities operating in the insurance sector to establish whistleblowing procedures. The decree determines the controls for protecting and examining complaints from clients.
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[1] It provides a model for companies’ internal policies as well as its disciplinary procedures. It is expected that the Ministerial Decree will soon be amended to comply with the new provisions listed under the New Labour Law.

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02. Which companies must implement a whistleblowing procedure?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Although whistleblowing is generally encouraged in certain sectors, specifically banks and companies subject to the supervision of the Financial Regulatory Authority, there is currently no statutory requirement under the Egyptian laws to establish and adopt a whistleblowing procedure.

Notwithstanding the above, the Guidelines issued by the CBE and FRA requires banks and insurance companies to adopt whistleblowing policies as explained under Question 1 above. Neither the CBE nor the FRA provides special sanctions for not adopting a whistleblowing policy. However, generally, the companies may face several inspection and financial penalties in the event of non-compliance with the CBE or FRA regulations.

Nevertheless, local employers are entitled to adopt any policies and procedures they deem best for their business if they do not contradict with the Egyptian laws. Most multinational and international companies with local presence adopt whistleblowing procedures.

On a relevant note, the ACA, in collaboration with the United Nations Global Compact (UNGC), has undertaken recent initiatives to organise training sessions and workshops aimed at private-sector companies to increase awareness regarding the significance of implementing internal compliance programs that encompass anti-corruption principles, particularly whistleblowing mechanisms.

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03. Is it possible to set up a whistleblowing procedure at a Group level, covering all subsidiaries whether in-country or overseas?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Yes, it is possible to set up a whistleblowing procedure at a group level covering local subsidiaries provided that the same does not contradict with the Egyptian laws.

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04. Is there a specific sanction if a Company fails to set up an internal whistleblowing procedure?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

There are no specific sanctions in place for failure to establish an internal whistleblowing policy.

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05. Must employee representative bodies be involved in the implementation of the system?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Further to the Trade Unions Law no. 213 of 2017, in the event of having a union committee inside the employer's establishment, such union should participate in the development or amendment of any internal regulations or systems within the establishment.

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06. What information must be provided to the workforce about whistleblowing procedures?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Employers should inform their employees of all policies in place as well as any amendments made thereon to ensure full compliance and awareness.

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07. Are there local language requirements?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

There are no local language requirements to adopt a whistleblowing procedure. However, maintaining an Arabic version is usually recommended to ensure clear understanding by all employees and avoid enforceability issues if an employee claims they did not fully understand the content of the established procedures.

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08. Must an employer manage the reporting channel itself or can it be outsourced to an external provider whether in-country or overseas?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

There are no specific provisions regarding this matter in Egypt.

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09. What are the obligations of an employer regarding the protection of data collected through the operation of the whistleblowing procedure?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Any business that collects or processes personal data for its employees, customers or any other

individuals is deemed a data “Controller” or “Processor” which entails compliance with the requirements set forth for these categories under the Egyptian Personal Data Protection Law no. 151 of 2020 (the “PDPL”) and its executive regulations no. 816 of 2025 (“**PDPL ER**”). In this regard, the PDPL and the PDPL ER provide that the following activities require a prior license or permit from the Egyptian Personal Data Protection Centre (the “Centre”), which includes :

- collection or processing of personal data electronically;
- controlling or processing personal sensitive data; and
- transfer of personal data across borders.

Further, the PDPL permits the transfer of data outside of Egypt subject to certain conditions. The PDPL requires obtaining a license or permit from the Centre for cross-border data transfer. The licenses will only be granted in case the jurisdiction to which the data is transferred has a data protection regulatory framework that would provide at least equal protection for personal data as the PDPL.

In addition to the above, the ACA reiterates that all employers should adopt strict confidentiality procedures to safeguard the whistleblowers’ identities and reports, and prevent unauthorised access, through using secure systems.

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10. What precautions should be taken when setting up a whistleblowing procedure?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

We recommend the following:

- full protection for whistleblowers;
- provide clear and easily accessible reporting channels;
- conduct training sessions;
- anonymity of whistleblowers;
- confidentiality of the process; and
- establish a system for documenting and tracking reported concerns, investigations, and outcomes.

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11. What types of breaches/violations can be the subject of a whistleblowing report?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

In Egypt, there are no specific regulations governing whistleblowing reporting in workplaces. Accordingly, any illegal dealings or misconducts of a company or any employee therein may be subject to whistleblowing. This may include other acts, actions and practices related to corruption, such as bribery, embezzlement, or abuse of power.

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12. Are there special whistleblowing procedures applicable to specific economic sectors or professional areas?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Yes, there are some whistleblowing procedures tailored to specific sectors that may be found under various laws, including:

- Penal Code no. 58 of 1937;
- Illicit Gains Law no. 62 of 1975;
- Law no. 80 of 2002 promulgating Anti-Money Laundering Law; and
- Law no. 3 of 2005 on the Protection of Competition and the Prohibition of Monopolistic Practices.

Furthermore, there are sector-specific procedures for reporting issues concerning certain governmental authorities such as the FRA, CBE, the ACA, the Egyptian Competition Authority, the Egyptian Drug Authority and agencies responsible for environmental protection.

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13. When can an individual make an external whistleblowing report or a public disclosure?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

The Egyptian laws require and encourage reporting to the relevant governmental authorities in case of criminal offences.

In all cases, it is crucial for whistleblowers considering external reporting or public disclosure to be aware of the afforded legal protections and the potential associated risks.

14. What is the legal definition of a whistleblower?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

There is no specific legal definition for a whistleblower under the Egyptian laws.

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15. Who can be a whistleblower?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

A whistleblower may be an employee or a stakeholder of a company. In general, any person may be a whistleblower.

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16. Are there requirements to fulfil to qualify as a whistleblower?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

There are no requirements to qualify as a whistleblower in Egypt.

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17. Are anonymous whistleblowing reports admissible?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Yes, anonymous whistleblowing reports are admissible in Egypt. As a member state of the UNCAC, Egypt adheres to Article 13(2) thereof, which requires member states to ensure that anti-corruption bodies are publicly known and provide channels for reporting, including anonymously.

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18. Must a whistleblower have been a direct witness to the breach/violation that they make a whistleblowing report on?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

There are no specific provisions regarding this matter in Egypt.

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19. What are the terms and conditions of the whistleblowing procedure?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

There are no specific provisions regarding this matter in Egypt.

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20. What confidentiality obligations apply?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

In Egypt, there is no specific legal framework detailing confidentiality obligations for whistleblowing except for the PDPL as stipulated in Question 9. However, confidentiality is a standard practice in handling such reports. Entities like the ACA and internal company systems are expected to protect the whistleblower's identity and handle reports discreetly to prevent retaliation and maintain investigative integrity.

Employees are also under a general confidentiality obligation regardless of their level or seniority.

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21. Is there a hierarchy between different reporting channels?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

There are no specific provisions regarding this matter in Egypt.

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22. Must an employer inform external authorities about whistleblowing reports received? If so, in what circumstances?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

The decision for an employer to notify external authorities about whistleblowing depends on the nature of the reported issue. If the whistleblowing involves criminal activity, the employer is required to report it to external authorities.

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23. Can a whistleblower be sanctioned if the facts, once verified, are not confirmed or do not demonstrate a qualifying violation/breach?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

A whistleblower cannot be penalised if the disclosure is made in good faith or with reasonable belief. Whistleblowers may be subject to criminal liability or disciplinary actions, if the disclosure is frivolous or malicious.

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24. What are the sanctions if there is obstruction of the whistleblower by the employer?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Under Egyptian laws, there is no specific legal framework that directly addresses sanctions for obstructing a whistleblower by an employer. However, employers who retaliate against or obstruct whistleblowers may face legal actions under employment laws and regulations as well as the internal policies. Furthermore, Article 165 of the New Labour Law prohibits the dismissal of an employee on the ground of filing a complaint or claim against the employer.

In all cases, employers may face repercussions if found to be obstructing investigations into corruption or misconduct or any inspections from the governmental.

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25. What procedure must a whistleblower follow to receive protection?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

The general steps to seek protection are:

- reporting in compliance with the company's internal policies; and
- the disclosure must be made in good faith and with reasonable grounds to believe that unethical or illegal activity is occurring or imminent.

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26. What is the scope of the protection?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

There are no specific provisions regarding this matter in Egypt. We believe that whistleblowers should be at least entitled to several protections, including:

- confidentiality of their identity;
- protection from victimisation or unfair treatment due to their disclosure; and

- protection from dismissal, demotion, or denial of employment benefits.

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27. What enforcement mechanisms apply and what are the possible sanctions for breach of the requirements?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

In practice, if a whistleblower fails to follow internal company procedures or reports in bad faith, they may face disciplinary actions and potentially legal consequences as mentioned.

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28. Are there sanctions for violating a duty to maintain the confidentiality of the identity of a whistleblower? If so, what sanctions apply?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Egyptian law does not explicitly outline sanctions for breaching whistleblower's confidentiality. In addition to the provisions of the PDPL, the whistleblower may rely on the general principles of law to claim compensation for the damages they have incurred due to such breach.

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29. Are there exemptions from liability for whistleblowers?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Yes, the Egyptian laws may offer partial or full exemptions from liability for whistleblowers in specific cases such as money laundering, protection of competition and prohibition of monopolistic practices, illicit gains, bribery and crimes affecting public security, economy and funds.

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30. What support measures are provided to an individual who qualifies as a whistleblower?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

While there are no specific detailed support measures for whistleblowers under the current Egyptian laws, existing constitutional rights, general labour protections, and reporting channels offer some level of support, as explained hereinabove.

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31. What are the risks for a whistleblower who makes a false report or who fails to comply with the whistleblowing procedure?



Authors: Alia Monieb, Abdalla Shohdy, Hoda Khira, Seifeldin Hamad
at ADSERO - Ragy Soliman & Partners

Please refer to Question 23. Criminal liability may exist in case bad faith was proved.

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Contributing editors

Brian Kaplan, *DLA Piper*
Pilar Menor, *DLA Piper*
Sarah Hellewell, *DLA Piper*

Contributors

Alia Monieb, *ADSERO - Ragy Soliman & Partners, Egypt*
Abdalla Shohdy, *ADSERO - Ragy Soliman & Partners, Egypt*
Hoda Khira, *ADSERO - Ragy Soliman & Partners, Egypt*
Seifeldin Hamad, *ADSERO - Ragy Soliman & Partners, Egypt*