

Policy and Instructions

Title: Group Whistle-Blowing Policy

Approved by: Board of Directors

Last reviewed: 18 April 2010 (next review to be within one year of this date)

Exceptions: Board Corporate Governance Co. (Request for Approval must be submitted for implementation of any exceptions)

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SECTION 1 - INTRODUCTION

As part of al khaliji's commitment to the highest possible standards of openness, probity, accountability, integrity, honesty and transparency, which are expressed in the Bank's core values, al khaliji has adopted a whistle blowing program that is binding for al khaliji Group and its representatives. This program will allow the users to raise their suspicions and concerns in an easy and secure mechanism while maintaining their anonymity if they wish not to be identified.

SCOPE

This policy applied on al khaliji Group and its representatives, including al khaliji's employees, directors and contractors or any third party who have access to non-public information.

SECTION 2 - POLICY

Whistle-Blowing Program

In order to encourage the prompt reporting of concerns and suspicions, al khaliji has adopted a policy of encouraging employees who have knowledge of misconduct to come forward. Employees can report a fraud or corruption or non compliance concern directly to the Group Head of Compliance or can use the alternative reporting mean "Compliance Reporting Hotline" for those who wish to stay anonymous. Any person who in good faith raises concerns about or reports crimes, contraventions (including negligence, breach of contract, breach of policy, breach of law or regulatory requirements) shall not be dismissed or otherwise penalized directly or indirectly for such acts, including in respect of any prohibition against disclosure of non-public information.

The main features of the program are:

- Compliance Reporting Hotline: al khaliji provides the means for any person who in good faith raises concerns and suspicions through a web reporting tool and telephone service that is available 24/7 with the option to retain anonymity.
- Method and process to follow up reports made and response between the Bank and anonymous caller/ reporter
- Board Audit Committee will exercise its oversight role to the hotline service and the reports received
- Protection program, whereby any person who reports reportable conduct in good faith will not be personally disadvantaged, However, if the person purporting to be a whistleblower has made deliberately false or malicious report, then the person concerned will be subject to disciplinary proceedings as provided for by al khaliji's internal policies and procedures.

Al Khaliji's Whistle-Blowing Hotline and Website:

- al khaliji Whistle-Blowing Hotline: +1 (704) 474-5677
- al khaliji Whistle-Blowing Website: alkhaliji.alertline.com

For more information on al khaliji approved policies, please contact:

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