

INVESTCORP					
POLICY GUIDELINES					
<b>LOB</b>	Legal & Compliance	<b>Revision date</b>	September 23, 2014	<b>Authorized by</b>	BSC Board
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## Investcorp Bank B.S.C.

### Public Disclosure Policy and Procedures Statement

#### A. Disclosure Policy

It is the policy (the “Disclosure Policy”) of Investcorp Bank B.S.C. (“Investcorp Bank”) to provide to its shareholders, clients, creditors, depositors and employees public disclosures that are fair, transparent, comprehensive and timely.

Investcorp Bank is subject to certain disclosure rules that have been promulgated by the Central Bank of Bahrain (the “CBB”) and the Bahrain Bourse (the “BB”).

In addition, Investcorp Bank’s wholly-owned subsidiary Investcorp S.A. (“ISA”) has issued bonds that are listed on the London Stock Exchange and it also has issued bonds that are listed on the SIX Swiss Exchange (the “SIX Exchange”). Consequently, ISA is subject to certain UK Financial Conduct Authority (the “FCA”) and SIX Exchange disclosure rules. Further, Investcorp Bank’s wholly-owned subsidiary Investcorp Saudi Arabia Financial Investments Co. is subject to certain limited Saudi Arabian Capital Market Authority (the “CMA”) disclosure requirements.

The disclosure rules of the CBB, the BB, the FCA, the SIX Exchange and the CMA are collectively referred to herein as the “Applicable Rules”.

#### B. Disclosure Procedures

The following procedures must be observed to ensure that the standards of the Disclosure Policy are satisfied:

- The General Counsel and Head of Compliance of Investcorp Bank (the “GC/HC”) is responsible for ensuring that all information that a reasonable investor would consider to be material in determining whether to buy, hold or sell Investcorp Bank or ISA securities is publicly disclosed by Investcorp, in the manner specified by the Applicable Rules, as soon as practicable except in the limited circumstances in which the Applicable Rules permit such disclosure to be delayed.
- The GC/HC is responsible for reviewing all information regarding Investcorp Bank and/or any of its consolidated subsidiaries (“Investcorp”) that is proposed to be disclosed publicly by Investcorp to determine if such disclosure satisfies the standards of the Disclosure Policy and the Applicable Rules.
- No information regarding Investcorp can be publicly disclosed by Investcorp unless such disclosure has been approved by the GC/HC after it has been approved by the Head of Corporate Communications. Such public disclosure includes, but is not limited to:
  - Announcements regarding Investcorp’s full year and half-year financial results
  - Any other press release

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- Investcorp's Annual Report
  - All information regarding Investcorp that is disclosed publicly by Investcorp should be made available on Investcorp Bank's website promptly after such disclosure, and Investcorp Bank's audited annual financial statements for at least the last three years should be available on Investcorp Bank's website at all times. The Corporate Communications Department is responsible for ensuring that these requirements are satisfied.
  - The Gulf Compliance Officer is responsible for verifying that Investcorp's Financial Management Department maintains an up to date checklist of all applicable International Financial Reporting Standards and the disclosure requirements set forth in the CBB's Public Disclosure Module.
  - The GC/HC is responsible for maintaining information regarding FCA and SIX Exchange disclosure requirements as advised by external counsel.