Burgan Bank

Whistleblowing Policy

بنک برقان
BURGAN BANK

Introduction

This Policy has been developed by and is exclusive property of Burgan Bank. The Policy is publicly intended solely for informational purposes. No part of this Policy may be copied, reproduced, distributed, modified, or transmitted in any forms or any means without the prior written consent of Burgan Bank. Any unauthorized use, reproduction, distribution, or modification of this Policy may result in legal action in accordance with applicable laws and regulations.

Policy Statement

The Whistleblowing policy aims to improve the systems and procedures, encourage and support Employees, and improve the overall integrity and performance of the organization through transparent policies and effective procedures. It will allow Employees to communicate any fears or doubts they might have on the possibility of violations in a way that allows independent investigation into these fears and their follow-up.

This policy is applicable to all of the Bank's Employees, vendors, consultants and advisors, in addition to other related parties, and encompasses all stakeholders, both minority and majority.

Any disclosures / concerns against any of the Executive Management Team ("EMT") are directed to the Chairman of the Board, who shall then liaise on the matter with the Board Audit Committee ("BAC") and General Manager – Human Resources Group (GM – HRG).

Internal and external fraud perpetrated against clients, Employees or shareholders is primarily covered by law. However, these can be reported through this policy if the whistleblower fears retaliation and wants to take advantage of the protections afforded by this policy and the provisions of this policy which apply to the event being reported.

Definition

Whistleblower refers to any person (internal or external) who, in good faith, discloses a confidential or anonymous information in whatever form in connection with an allegation of misconduct, fraud, corruption, illegal act, malpractice or any other misconduct by any Employee under any of the Bank's policies and procedures as applicable from time to time. Whistleblowers are not those who raise issues or concerns through the normal business or management channels in an open, non-confidential manner.

Disclosure

For the purpose of this policy, whistleblowing refers to any voluntary, good- intentioned communication that discloses or demonstrates disclosure of information that may evidence the involvement of any Employee in (1) an improper activity (2) misconduct and / or (3) any condition that may significantly threaten the health or safety of Employees or the public.

All Employees are encouraged, and have a responsibility to report any known or suspected activity that may involve malpractice. Employees, including the WBC members and the WBO, must not undertake any activity or action that is perceived to be victimization or harassment of the whistleblower.

Governance

The Whistleblowing Committee ("WBC") is appointed by GCEO / CEO – Kuwait and ratified by the Chairman of the Board and is responsible for the governance of the Whistleblowing process in the bank. The WBC consist of Chief Internal Audit– ("CIA"), GM – HRG, GM – Legal Group and Chief Risk Officer ("CRO"). The Deputy General Manager – Compliance ("DGM – Compliance") may be invited to the WBC by the GCEO / CEO – Kuwait as and when required.

The GM – HRG will function as the nominated coordinating Whistleblowing Officer (WBO), as appointed by the Chairman of the Board. The Board Corporate Governance Committee ("BCGC") holds the authority to appoint and alter the appointment of the WBO with due notification to the GCEO / CEO – Kuwait.

A specialized person within HR, will be appointed by the WBC as Welfare Manager, to support the whistleblower and ensure the protection from any reprisals or detrimental action resulting from making a disclosure.

Confidentiality and Protection of Whistleblower

Generally, the identity of the whistleblower shall remain confidential except to the WBC and the WBO, and shall not be disclosed by any of them without the express consent of the whistleblower. The whistleblower may choose, in some exceptional circumstances, to remain anonymous even to the WBO and the WBC. Anonymous disclosures may be considered at the discretion of the organization (i.e., the WBC and / or the BCGC), considering the seriousness of the issue and the credibility of the concern.

The Bank shall not permit any form of detrimental action against Employees, who made disclosures or submitted information knowing or reasonably believing them to be true. Remedies offered to a whistleblower subjected to such actions shall be determined by the BCGC based on recommendation(s) from the WBC and / or GCEO / CEO – Kuwait.

Reporting Channels and Procedures

There are three ways for concerns to be raised under this policy.:

- **By Email**: Email details of concern to WB@burgan.com. Emails sent to this account will only be accessed by the WBC members, WBO and the Chairman of the Board.
- **By Phone**: Call hotline on 1824030 that will be present with designated members of the WBC. The hotline will be accessed by GM – HRG, GM – Legal Group and the CIA
- **Online Platform**: whistleblower online form channel that can be found on the intranet home page. The concerns raised through the Whistleblower online form will only be accessed by the GM – Legal Group, CIA, GM – HRG and Chairman of the Board.

False Accusations

Where an allegation is proven to have been made falsely against the subject of an investigation and this information has been clearly proven to be wrong or unsubstantiated, then the BCGC shall – based on the recommendation of the WBC – decide if the Bank should issue a statement of support to the person investigated, if the matter has been made public.

Abbreviation	Description
BAC	Board Audit Committee
BCGC	Board Corporate Governance Committee
CEO - Kuwait	Chief Executive Policy
CRO	Chief Risk Officer
GCEO	Group Chief Executive Officer
DGM	Deputy General Manager
EMT	Executive Management Team
WBC	Whistle Blowing Committee
WBO	Whistle Blowing Officer