



**GULF HOTELS GROUP
POLICIES & PROCEDURES**

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I. POLICY:

The Board is committed to the highest possible standards of openness, probity and accountability. This policy document explains the modalities of reporting any misconduct to the designated officials. This policy is formulated to provide opportunity to employees to raise their voice in good faith, in case they observe unethical and improper practices or any other wrongful conduct in the Company and to ensure protection to the whistleblower. In line with that commitment we expect employees, who have serious concerns about any aspect of the working of the company to come forward and voice their concerns. The policy document makes it clear that you can do so without fear of victimization, subsequent discrimination or disadvantage. This whistle-blower policy is intended to encourage and enable employees to raise serious concerns within the company rather than overlooking a problem or 'blowing the whistle' outside.

This policy has been approved by the Corporate Governance Committee in their meeting held on the 09th November 2015.

II. AIMS AND SCOPE OF THIS POLICY

This policy aims to:

- Encourage the employee to feel confident in raising serious concerns and to question and act upon concerns about practice.
- Provide avenues for employee to raise those concerns and receive feedback on any action taken.
- Ensure that employee receives a response to their concerns and that they become aware of how to pursue them if they are not satisfied.
- Reassure that whistleblower will be protected from possible reprisals or victimization.
- The whistle-blower policy is intended to cover major concerns. These include:

- (1) Conduct which is an offence or a breach of law.
- (2) Disclosures related to miscarriages of justice.
- (3) Health and safety risks, including risks to the public as well as to the employees.
- (4) Damage to the environment.
- (5) The unauthorized use of company funds.
- (6) Possible fraud, corruption and misuse of company's assets.
- (7) Sexual or physical abuse of clients, staff or other unethical conduct.

Following issues will not be covered by this policy.

- 1) Personal grievance of staff members.
- 2) Matters which are already known to the management and are acted upon.

 SURESH SURANA Chief Financial Officer Gulf Hotels Group	 GARFIELD JONES Deputy Chief Executive Officer Gulf Hotels Group	 AQEEL RAEES Chief Executive Officer & Board Member Gulf Hotels Group
 Jassim Abdulaal Chairman Audit Committee and Member of Corporate Governance Committee Gulf Hotels Group	 Farouk Almoayyed Chairman of Board/Corporate Governance Committee Gulf Hotels Group	



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III. HOW TO RAISE A CONCERN

- Employee can raise their concern directly to **Audit Committee Chairman** currently Mr. Jassim Abdulaal on the below address and phone no:
(Mr. Jassim Abdulaal, P O Box 11175, 12th Floor Al Nakheel Tower, Kingdom of Bahrain
Phone: +973 17500188, email: jassim.abdulaal@bh.gt.com) or any person board may designate from time to time. *Mob: 39605262*
- Concerns may be raised verbally or in writing. Staff who wish to make a written complaint should include the following in their report:
 - The background and history of the concern (giving relevant dates);
 - The reason why he/she is particularly concerned about the situation.
- The earlier you express the concern the easier it is to take action.
- Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

IV. PROTECTION TO THE WHISTLEBLOWER

- Harassment or Victimization**
The Board is committed to good practice and high standards and wants to be supportive of employees.
The Board recognizes that the decision to report a concern can be a difficult one to make. If the employee is acting in good faith, he should have nothing to fear because he will be doing his duty towards employer and those for whom he is providing a service.
The Board will not tolerate any harassment or victimization (including informal pressures) and will take appropriate action to protect the employee when he raises a concern in good faith.
- Confidentiality**
All concerns will be treated in confidence and every effort will be made not to reveal the employee identity if he so wish. At the appropriate time, however, you may need to come forward as a witness.

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- **False allegation & legitimate employment action**

If the employee makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against him. If, however, he makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against him. However, this policy may not be used as a defense by an employee against whom an adverse personnel action has been taken independent of any disclosure of information by him and for legitimate reasons or cause under Company rules and policies.

V. DEALING WITH REPORTS/COMPLAINTS.

- Audit Committee shall appropriately and expeditiously investigate all whistle blower reports received.
- In this regard, Audit Committee, if the circumstances so suggest, may appoint a senior executive or a committee of personnel not involved in the operations of the company to investigate into the matter and prescribe the scope and time limit therefore.
- Audit Committee shall have right to outline detailed procedure for an investigation. Where the Audit Committee has designated a senior executive or a committee of personnel for investigation, they shall mandatorily adhere to scope and procedure outlined by Audit Committee for investigation.
- The Audit Committee or officer or committee as above mentioned, as the case may be, shall have right to call for any information/document and examination of any employee of the Company or other person(s), as they may deem appropriate for the purpose of conducting investigation under this policy.
- A report shall be prepared after completion of investigation and the Audit Committee shall consider the same at the earliest audit committee meeting.
- After considering the report, the Audit Committee shall determine the cause of alleged issue and shall order for remedies as it deems appropriate.

VI. REASON.

To enforce more control and to safeguard the interest of company and employees who are alerting any misconduct to the designated officials.

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