

INVESTCORP					
POLICY GUIDELINES					
<b>LOB</b>	Legal & Compliance	<b>Revision date</b>	September 30, 2020	<b>Authorized by</b>	BSC Board
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## Investcorp Holdings B.S.C.

### Public Disclosure Policy and Procedures Statement

#### A. Disclosure Policy

It is the policy of Investcorp Holdings B.S.C. (“Investcorp Holdings”), and its consolidated subsidiaries (together “Investcorp”) to provide to its shareholders, clients, creditors and employees public disclosures that are fair, transparent, comprehensive and timely.

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

#### B. Disclosure Procedures

The following procedures must be observed to ensure that the standards of this policy are satisfied:

- The General Counsel of Investcorp Group (the “GC”) 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 Holdings’ securities is publicly disclosed 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 or the Deputy General Counsel (“Deputy GC”) or their respective designee is responsible for reviewing all information regarding Investcorp that is proposed to be disclosed publicly to determine if such disclosure satisfies the standards of this policy and the Applicable Rules.
- No information regarding Investcorp can be publicly disclosed unless such disclosure has been approved by the GC or the Deputy GC or their respective designee after it has been approved by the Head of Corporate Communications of Investcorp Group. Such public disclosure includes, but is not limited to:
  - Announcements regarding Investcorp’s financial results
  - Any other press release
  - Investcorp’s Annual Report
- All information regarding Investcorp that is disclosed publicly should be made available on Investcorp Holding’s website promptly after such disclosure, and Investcorp’s consolidated audited annual financial statements for at least the last five years should be available on Investcorp Holding’s website at all times. The Corporate Communications Department of Investcorp Group is responsible for ensuring that these requirements are satisfied.
- The Compliance leader who covers the Gulf is responsible for verifying that Investcorp Group’s Financial Management Department maintains an up to date checklist of all disclosure requirements set forth in the Applicable Rules.