

A Guide to Whistleblowing and Various Regulations in the Middle East  
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# WHISTLEBLOWING AND VARIOUS REGULATIONS IN THE MIDDLE EAST

“Without strong watchdog institutions, impunity becomes the very foundation upon which systems of corruption are built. And if impunity is not demolished, all efforts to bring an end to corruption are in vain.”  
-Rigoberta Menchú, Nobel Prize laureate

## 1. Understanding Whistleblowing

**W**histleblowing is an act wherein the public or authorities are informed of an illegal activity taking place in an organization. It is also called good faith reporting. It is an act of drawing the attention of the public or authority to exhibit an unethical activity which may either be illegal or immoral.

Janet P. Near and Marcia P. Miceli has defined the term 'whistleblowing' in **Organizational Dissidence: The Case of Whistle-Blowing (Vol.4, No.1-1985)** as the following-  
“...the disclosure by organizational members (former or current) of illegal, immoral or illegitimate practices under the control of their employers, to persons or organisations that may be able to effect action.”

Since the term does not explicitly lay down the list of activities which are to be included, the scope of the term is broad, and it may consist of any pursuit which is unlawful as per the jurisdiction of the deciding state. Examples include- fraud, safety violation, health violation, misconduct, exploitation, discrimination, etcetera.

**Janet P. Near and Marcia P. Miceli** in their case study on whistleblowing has also explained the concept of whistleblowing through a four-step process, and it may be described as the following:

- I. The identification of the wrongful act.
- II. The act of reporting.
- III. The response of the organization towards shutting down the reported activity.
- IV. The response of the organization towards the whistleblower.

The activity being reported or informed may be such that it may be taking place or has already taken place. In general, whistleblowing consists of two types namely-

- I. Internal whistleblowing
- II. External whistleblowing

Internal whistleblowing is a kind of whistle-blowing wherein a person provides the information within the organization, whereas in the case of external whistleblowing, the information is reported by a person outside the organization involved.



The person who informs the authorities or the public of the illegal activity is called a 'whistleblower.' Since they are the ones who report the information, they often face retaliation from the accused. Once the whistle is blown, they are at the risk of being affected and may undergo reputational and other severe damages. It is for this reason that whistleblowers must be protected and therefore the safety of whistleblowers is highly recognized throughout the world and is a matter of high priority for the legal system. At present, most nations have formulated and adopted policies for the protection of whistleblowers.

## 2. International Position on the Concept of Whistleblowing

There has been an increase in the acknowledgment of, and considerable importance has been given to the notion of whistleblowing. The need for the establishment of a whistleblower policy is to prevent fraud and unethical activities within an organization and to secure a better institutional culture thereby increasing efficient management and transparency.



*“Every country needs its whistleblowers.  
They are crucial to a healthy society.  
The employee who, in the public interest, has the  
independence of judgement and the personal courage  
to challenge malpractice or illegality is a kind of public hero.”*

*– Faud Alakbarov*

Before the development of the protection of whistleblowing, whistleblowers were not very well recognized or accepted, hence, they were treated as traitors. Now, the standpoint against whistleblowers is more optimistic. Countries around the world are working on formulating policies for the protection of whistleblowers. Most signatory states to the United Nations have ratified and adopted the United Nation Convention against Corruption (UNCAC). The Convention provides for promoting anti-corruptive activities within the public and private sector, and the protection of whistleblowing is also covered under it.

The International Labour Organization (ILO) defines whistleblowing as:

*“The reporting by employees or former employees of illegal, irregular, dangerous or unethical practices by employers.”*

However, since protection of whistleblowing is a developing concept in law, it is not easy for the countries to implement a strict policy on whistleblowing.

The United Nation Convention against Corruption (UNCAC) mandates member countries to adopt legal provisions for the protection of those who report corruption and other related offences from reprisal.

The Article 33 (Protection of reporting persons), provides for the following whistleblower protection:

*“Each State Party shall consider incorporating into its domestic legal system appropriate measures to provide protection against any unjustified treatment for any person who reports in good faith and on reasonable grounds to the competent authorities any facts concerning offences established in accordance with this Convention.”*

In Europe, the Civil Law Convention on Corruption is an agreement which came into force in 2003, and it deals with preventing corruption amongst the member nations.

Article 9 of the Convention specifically lays down the provision on the protection of whistleblowers;

*“Each Party shall provide in its internal law for appropriate protection against any unjustified sanction for employees who have reasonable grounds to suspect corruption and who report in good faith their suspicion to responsible persons or authorities.”*

The Organization for Economic Co-operation and Development is an international organization which is established to promote international trade and stimulate the economy. The organization also focuses on maintaining anti-corruptive practices and good governance. In 2003, The Council made a recommendation on the guidelines for managing conflict of interest in the public services. the guidelines aim to make recommendations to member countries in accordance with their political, administrative, and legal framework.

The Guidelines recommend (2.3.2):

*“Develop complaint mechanisms to deal with allegations of non-compliance, and devise effective measures to encourage their use. Provide clear rules and procedures for whistleblowing, and take steps to ensure that those who report violations in compliance with stated rules are protected against reprisal, and that the complaint mechanisms themselves are not abused.”*

#### **Examples Of Whistleblowing**

i. In one of the cases, Jeffrey Wigand was the Vice President for tobacco research and development at Brown Williamson. He blew the whistle on Big Tobacco (a company), by reporting how it minimized health and safety issues and concerns. Subsequently, he was fired as a result of his action. The company also made specific allegations against him.

ii. In 2009, some of the employees of Pfizer revealed the company's illegal promotion of Bextra, a drug. All the employees who exposed the activity,

*"Medical profession is a feat, it requires self-sacrifice, purity of soul and purity of thoughts."*

– Anton Chekhov



including the main whistleblower John Kopchinski, received 102 million dollars as compensation for their efforts.

### **2.1 What Are The Consequences Faced By The Whistleblower?**

The following are some of the ways in which a whistleblower may be attacked-

- i.* The one reporting the illegal activity may be subject to harassment.
- ii.* The whistleblower may be subject to threat.
- iii.* The career growth of the employee within the organization may be obstructed.
- iv.* Financial aid may be cancelled.
- v.* Legal action may be taken.
- vi.* The whistleblower may be subject to physical assault.
- vii.* Ostracism or rejection is also one of the most common ways in which a whistleblower is attacked.

Nowadays, many whistleblowers are using technology to share their information to maintain their anonymity. Specific softwares have been built for the whistleblowers to report the information and for securing whistleblowing.

Whistleblowing may also be categorized on the basis of the sector to which the organization belongs such as, private and public. Whistleblowers may face the consequences for their action accordingly. In the case of a private sector, they may face termination or other legal implications, whereas, in the case of the public sector, it may even result in a criminal charge. Apart from this, the whistleblowers may also be subject to personal enmity as a result of their action.

### **2.2 Origin And History**

The origin of the term 'whistleblower' goes back to the 19th century, However, until the 1970's the word had a

negative association. A decisive turn commenced due to the efforts of U.S. civic activist Ralph Nader.

Ralph Nader describes whistleblowing as:

*"An act of a man or woman who, believing that the public interest overrides the interest of the organization he serves, blows the whistle that the organization is involved in corrupt, illegal, fraudulent or harmful activity."*

The US False Claims Act was one of the first legislation on whistleblower policy. The law was enacted in 1863, and it came into force subsequent to the discovery of inadequate supplies to the Army. However, the concept of whistleblowing as present today was initiated by the US Activist Ralph Nader.

### **2.3 Why Do Whistleblowers Need To Be Protected?**

*"The purpose of whistleblowing is to expose secret and wrongful acts by those in power in order to enable reform." – Glenn Greenwald*

The concepts of whistleblowing and protection to whistleblowers have been included in various jurisdictions. Since the whistleblower may be put under challenging circumstances while dealing or coming up with such reports, it is necessary that law provide adequate protection to such persons.

The tenth-report of the United Kingdom's Committee on Public Life explains the need or importance of adoption of whistleblower protection policy:

*"The essence of a whistleblowing system is that staff should be able to by-pass the direct management line, because that may well be the area about which their concerns arise, and that they should be able to go outside the organization if they feel the overall management is engaged in an improper course. Effective whistleblowing is, therefore, a key component in any strategy to challenge inappropriate behavior at all levels of an organization. It is both an instrument in support of good*



*"It is time to clear the air, punish the guilty and protect the whistleblowers."*

*-Tony Leon*

*governance and a manifestation of a more open organizational culture. Successful whistleblowing, in terms of a healthy organizational culture, is when concerns are raised internally with confidence about the internal procedures and where the concern is properly investigated and, where necessary, addressed."*

The following are some of the characteristics of whistleblower protection-

- i.* To protect the whistleblowers from reprisal.
- ii.* To maintain anonymity and secure confidential information.
- iii.* To protect the whistleblowers from civil and criminal liability.
- iv.* To provide other measures such as temporary reassignment, transfer, etc.

The protection of whistleblowers only works in a society which is more transparent and maintains accountability. Some whistleblower protection laws are confined only to protecting employees of the public sector and not to the private sector.

#### **2.4 What needs to be included in the protection policy or statutes governing whistleblowing?**

- i.* The whistleblowing policy has to cover all the aspects dealing with the protection of persons providing information relating to corruption or misconduct within the organization.
- ii.* The person who gives the information or whistleblower must be protected from any form of retaliation.
- iii.* The policy must allow the whistleblowers to maintain anonymity and confidentiality.
- iv.* Immunity must be granted to the whistleblowers from being charged with any offence such as defamation.

*v.* The liability of the whistleblower must be waived.

*vi.* Grant of reward and compensation.

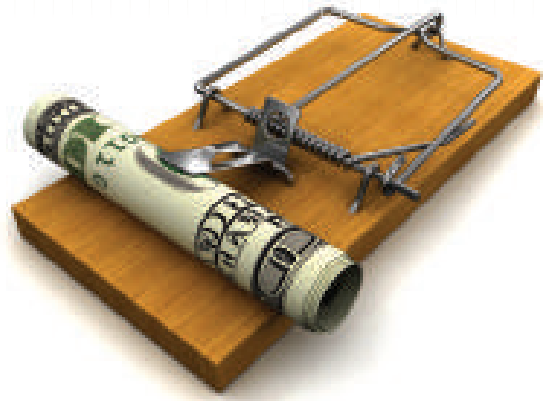
*vii.* The policy/law should enable the creation of an independent body to deal with the reported matters and advising the whistleblower. It is also necessary that such an agency has exclusive jurisdiction over the subject matter.

Protection of whistleblowers is to be treated with utmost importance since the information shared by the whistleblowers is not something which affects one person; these are reports which affect the public at large or an entire organization. Internal whistleblowing is against illegal deeds taking place in an organization; hence, it is not possible for a whistleblower to restrict reporting to fellow employees since it would have an adverse effect on the position of the whistleblower. Today, with the development of society and work ethics, whistleblowing has become an activity which is acceptable and is not regarded as an ignominy.

In the U.S, the federal courts recently issued decisions widening the Anti-Retaliation Law Statutes, thereby granting more protection to whistleblowers.

In *Kramer v. Trans-Lux Corp*, the plaintiff had commenced an action against his employer in the U.S District Court. He contended that he was terminated from his employment for reporting the violation of his supervisors regarding the pension plan. He stated, his termination was violative of the Dodd-Frank Anti-Retaliation Provisions. The defendants, in this case, dismissed the claim arguing that the plaintiff had failed to report the information in the manner as required, and that the Securities and Exchange Commission was the appropriate forum to report the incident. Hence, the defendant argued that the plaintiff would not satisfy the definition of the term 'whistleblower.'

*"The purpose of whistleblowing is to expose secret and wrongful acts by those in power in order to enable reform."  
- Glenn Greenwald*



The plaintiff in response, asserted the fact that the Dodd-Frank Anti-Retaliation Provisions covers any individual who makes a disclosure even if he was not confined to the definition of the term 'whistleblower.' Here the Court accepted the plaintiff's contention and therefore denied the defendant's motion.

### **3. Whistleblowing Regulations in the Middle East**

In the Middle East, the concept of the protection of whistleblowers did not evolve until recently. Now, most of the Middle Eastern countries have adopted various laws dealing with whistleblowing and the protection of whistleblowers. However, in the Gulf regions, the whistleblower cannot directly express or report the matter to the public. The whistleblower has to inform the police department or the concerned authority, or else it may affect the whistleblower on the grounds of defamation. Most of the Middle Eastern countries lack the notion of protection of whistleblowers. The Gulf countries have come up with their own programmes to tackle the issue. However, most of the organizations which have implemented the protection of whistleblowers are multinational companies and not the domestic ones.

Further, while disclosing the illegal activity, there is a high chance that the whistleblower may violate the confidentiality and it may result in civil or criminal action against him for breaking the trust and confidence entrusted in him. Therefore, it is advisable that before one blows the whistle, they may take adequate precaution since the effect may result in the contrary.

The recent developments of law in the United Arab Emirates, Kuwait, Saudi Arabia, and Qatar reveals that the attitude towards whistleblowers is undergoing a transformation, since through various methods, whistleblowers are protected either by national legislation or internal whistleblowing policy of the companies. This provides an opportunity for an employee of a company to report

any corruption which takes place in the organization without being subject to threats or consequences.

#### **3.1 Is Whistleblowing Protected in Kuwait?**

Kuwait has not laid down separate legislation for the protection of whistleblowers, but the concept of protection of whistleblowers is covered under the Kuwait Anti-Corruption Authority (NAZAHA). Kuwait has implemented and adopted a National Anti-Corruption Strategy to prevent any form of corruption. The vision as provided by the anti-corruption strategy is to maintain and run a society which is free from of all modes of corruption. The strategy mainly focuses its attention on eradicating corruption in the workplace. Additionally, it aims to eliminate all social, political and economic factors which contribute to any unethical or illegal activity which takes place in the organization.

The strategy provides for the following elements and instruments for preventing corruption-

- i.* Creation of an independent body to curb corruption- The Kuwait Anti Corruption Authority (NAZAHA).
- ii.* Formation of a Board of Trustees with members who are competent to regulate the objectives of the Authority.

#### ***Kuwait Anti Corruption Commission/Authority (NAZAHA)***

In 2007, Kuwait ratified the United Nations Convention against Corruption (UNCAC), and as a result, the Kuwait Anti-corruption Commission was established following the enactment of Law No. 2 of 2016. It is an independent authority established to implement the Anti-Corruption Strategy.

Article 4 of the Kuwait Anti-Corruption Commission's Establishment Law provides for the protection of whistleblowers.

#### **What constitutes a whistleblowing report?**

According to the established laws, when a natural or a legal person submits any information about a crime,



*"Every country needs its whistleblowers.  
They are crucial to a healthy society."  
- Fuad Alakbarov*

attempted crime, concealment of a crime, disposing crime evidence or a severe financial violation to NAZAHA or any concerned authority dealing with whistleblowing, it amounts to a whistleblowing report.

As per Articles 20, 37 and 38, reporting a form of corruption is not only a right which is available to a person, but rather is an obligation. Therefore, if a person witnesses a crime and fails to report it, he shall be liable to punishment. This projects the importance of reporting corruption. However, it must be understood that the established laws have laid down provisions relating to the protection of a whistleblower.

The following are some of the forms of protection-

- i.* Protection shall start right from the act of whistleblowing.
- ii.* NAZAHA shall provide personal protection by concealing the identity of the whistleblower and by replacing it with unique codes.
- iii.* Providing personal guard and assisting their legal affairs. NAZAHA has the right to seek assistance from individuals or companies to fulfill its obligations.
- iv.* Transferring the place of work or residence, either temporarily or permanently.
- v.* Changing telephone numbers and providing surveillance assistance.
- vi.* Allowing the whistleblowers to provide their statement using video conferencing for their safety.
- vii.* Preventing the organization from taking legal action against the whistleblower.
- viii.* No civil, criminal, or disciplinary action shall be taken against the whistleblower for the report when acted on good faith.
- ix.* Providing compensation to the whistleblower for any bodily damage provided that the report meets the necessary conditions.

The Article 22 of the Law establishing NAZAHA explains the crimes of corruption, and it includes the following:

- i.* Offences against the public funds as stated in Law Number (1) of 1993 dealing with protection of public funds.
- ii.* Bribery and abuse of influence as stated in Law Number (31) of 1970.
- iii.* Crimes stipulated in Law Number (106) of 2013 dealing with the money-laundering financing of terrorism.
- iv.* Falsification and forgery offenses as stated in Law Number (16) of 1960.
- v.* Offenses relating to the administration of justice as provided in Law Number (16) of 1960.
- vi.* Crimes of illicit gain.
- vii.* Crimes of smuggling as provided in Law Number (10) of 2003 dealing with Common Customs Law of the GCC States.
- viii.* Crimes of tax evasion stipulated in Decree Number (3) of 1955 dealing with Kuwait Income Tax.
- ix.* Crimes of impeding the work of the authority, putting pressure upon it to hinder the performance of its duties, interfering in its terms of reference, or refraining from providing it with the required information.
- x.* Crimes provided in Law Number (10) of 2007 dealing with the protection of competition.
- xi.* Crimes stipulated in Law Number (25) of 1996 dealing with disclosure of commissions in connection with state contracts.
- xii.* Any other crimes stated in any other law that is considered as corruption offences.

#### **What to do if involved in an incident of corruption?**

According to Article 43, a pardon can be granted for offenders who report an agreement to commit a crime of corruption.



***"If you want safety, peace, or justice work for competency, honesty, and transparency."  
-Dr. Bill Corcoran***



Two kinds of pardons may be granted, an Obligatory pardon or a Permissive pardon.

Conditions for obligatory pardon-

- i.* The perpetrator has to report the criminal agreement to NAZAHA, Public Prosecution, or other competent bodies.
- ii.* The report has to identify the persons involved in the crime.
- iii.* The incident has to be reported before it commences.

Conditions for permissive pardon conditions-

Permissive pardons takes place when the report is produced after the commission of the crime and before the beginning of the investigation, provided that the perpetrator—even during the investigation—enables the authorities to:

- i.* Capture the persons who have committed the crime.
- ii.* Seize the money related to the crime.
- iii.* Capture those who committed other crimes which is similar in nature and dangerous.

Thus, although Kuwait has not laid separate legislation for the protection of whistleblowers, the ambit of the anti-corruption commission is broad enough to encompass and deal with all the offences relating to whistleblowing and the protection of whistleblowers.

### **3.2 Is Whistleblowing Protected in the UAE?**

The UAE, until recently, had no particular legislation governing the protection of whistleblowers. However, the position has changed since the introduction of the Administrative Decision Number 123 of 2017 on the Regulatory Controls for Financial Activities and Services. Apart from this, companies may also formulate rules and laws relating to whistleblowers and protection of whistleblowers in their internal policies.

Article 274 of the UAE Penal Code deals with abstaining from reporting a crime, and it states the following:

"Shall be punishable by a fine not exceeding one thousand Dirhams any individual who has knowledge that a crime was committed and who refrains from denouncing it to the competent authorities."

Therefore, it makes it obligatory on the part of an individual to report a crime when witnessed. It is pertinent to note that the difficulty in protecting a whistleblower arises when Article 379 of the UAE Penal Code is read alone. The Article 379 of the UAE Penal Code reads as the following:

"Shall be sentenced to detention for a minimum period of one year and/or to a minimum fine of twenty thousand dirham, whoever by virtue of his profession, craft, position or art is entrusted with a secret and divulge it in cases other than those allowed by law or if used for his own personal interest or for the interest of another person, unless authorized by the confiding person to disclose or use it."

Therefore, disclosing the confidential information entrusted within an employee violates the provisions of the Civil Code thus making it hard on the whistleblower to report the information. A charge of defamation is also a possibility against the whistleblower for reporting an activity.

Now, the situation has changed with the evolution of new legislation and policies dealing with finance and with the introduction of financial crime law and the Administrative Decision Number (123 of 2017). Through the Decision, there exists a possibility of greater protection to whistleblowers.

### **Should a company establish a whistleblower policy?**

It is not mandatory for a company to form a whistleblower protection policy. However, Article 7 dealing with the General Provisions of the Administrative Decision Number (123 of 2017), states the following:



*"To see a wrong and not to expose it, is to become a silent partner to its continuance."  
- Dr. John Raymond Baker*

"The company shall establish a written policy inserted in its administrative regulations in order to encourage whistleblowing to the top management and SCA regarding any fundamental irregularities that may come to their knowledge in the performance of their duties, provided that the said policy includes the mechanism and the bases and guarantees for the whistleblower protection, as well as the policies to be followed in order to deal with the reported offense in terms of maintaining the confidentiality of the whistle blower's name and the entity responsible for following up on and handling the stated irregularity."

With the establishment of the State Audit Institution, now it is easier to report corruption to the authority. SAI is attached to the Federal National Council and is aimed at curbing fraud and corruption. Being an independent body, the State Audit Institution is responsible for detecting fraud and financial corruption under Article (2) of Federal Law Number (8) of 2011. The UAE ratified the United Nation Convention against Corruption under Federal Law Number (8) of 2006.

Therefore, though a blanket protection mechanism cannot be guaranteed under the UAE law for whistleblowers, the system is changing and now the internal regulatory departments of companies or organizations can constitute a whistleblower protection policy to curb the corrupt practices and to secure the protection of the whistleblowers.

### **3.3 Is Whistleblowing Protected in Oman?**

In Oman, currently, there are no laws which grant protection to whistleblowers. Since there is no particular law describing the position of whistleblowing or its regulations, the burden is on the company and its internal regulatory forum to protect and secure the protection of the whistleblowers. To maintain the international

standards, it is advisable that the company has a policy or panel to protect whistleblowers, thereby, making the system more transparent.

In Oman, some of the financial Institutions and governmental agencies have adopted the whistleblower protection policy. However, there is no obligation on the institutions to implement such policies. Though the country has zero-tolerance on matters relating to financial crimes, the concept of whistleblower protection is not covered under the present laws. The government of Oman ratified the United Nations Convention against Corruption (UNCAC) in 2014 and supported a strong policy against corruption. The implementation of a whistleblowing policy will show the institutions commitment against fraud and corruption and will further help in the development of organizational ethics.

### **3.4 Is Whistleblowing Protected in Saudi Arabia?**

There is no specific law which regulates the protection of whistleblowers. In Saudi Arabia, the protection provided to whistleblowers is vague and limited in the public sector. The shield does not extend to the private sector. However, a company may implement a whistleblower protection policy within the organization to secure the whistleblowers.

Recently, the Kingdom of Saudi Arabia introduced a royal decree to protect the whistleblowers in corruption cases after some of the whistleblowers were mistreated. The new announcement intends to secure and protect the whistleblowers. This is to enhance its lawful fairness and business, thereby accommodating international standards with interest to expand the economy.

### **3.5 Is Whistleblowing Protected in Bahrain?**

In Bahrain like other GCC countries, there is no specific law depicting the situation of whistleblowing or its controls.

*"A people that values its privileges above its principles soon loses both."  
- Dwight D. Eisenhower*

For example, in Bahrain, the Central Bank of Bahrain and National Bank of Bahrain permits staff disclosure and have adopted their policies. Bahrain ratified the United Nations Convention against Corruption (UNCAC) by decree number 7/2010.

Therefore, the person blowing the whistle has to take precaution before committing the act since it may result in termination from the employment or can have the effect of a criminal charge depending on the institution and its policy.



For example, in one of the cases an employee was dismissed by a Bahrain petroleum company (Bapco). It was reported that the dismissal was linked to the employee's communication to the media about the corruption in the organization, thereby, blowing the whistle.

#### **4. Conclusion:**

The field of whistleblowing is still in its earliest stages of development in the Middle East. Though whistleblowing as a concept is widely recognized, there are very few statutes which guarantee absolute protection to the whistleblower.

At present, only the internal regulatory policy of companies have provided for the protection of whistleblowers. Fewer have tried to address the issues faced by whistleblowers. In numerous areas, the laws are restricted in scope, and complete security is not granted. Therefore, more research needs to be done concerning the protection of whistleblowers to create a more effective and transparent structure in the organizations.

*To know more about whistleblowing and various regulations in the Middle East, contact our experts.*

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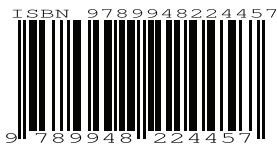
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