



# **Aldar Group**

## **Aldar Group Insider Trading Policy Manual**

**Instrument Information**

<b>Name</b>	Aldar Group Insider Trading Policy Manual
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**Instrument History**

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## A. INTRODUCTION

### 1. TITLE

- 1.1. This Instrument is entitled the Aldar Group Insider Trading Policy ("the Policy").

### 2. PURPOSE

- 2.1. Aldar Properties PJSC ("Company" or "Aldar") and its subsidiaries is committed to ensuring that it and all entities owned by it ("Aldar Group" or "Group") act lawfully, ethically and with integrity in handling confidential or undisclosed company information in all business dealings and ensuring full compliance with all relevant insider trading related requirements.
- 2.2. The Policy intends to guide Board of Directors ("BOD"), and all the Group's employees as well as the contractual staff ("Employees") (Group's Representatives) as to their obligations and responsibilities associated in their day-to-day activities.
- 2.3. The Policy sets out principles to provide guidance on how to identify, report and manage issues related to insider trading as per the local laws, regulations, international standards, and leading industry practices.

### 3. GOVERNING INSTRUMENT

- 3.1. The Policy outlines the Group's commitment to conducting business in compliance with applicable laws in the UAE in relation to insider trading, as well as applicable international standards and best practices to the extent they relate to the Group's activities.

### 4. SCOPE

- 4.1. The Policy applies to dealings in any listed securities including, but not limited to, shares, bonds, notes, sukuk, certificates and similar instruments issued or guaranteed by any entity of the Group, whether listed in the UAE or any other jurisdiction and any warrants, options and derivative instruments relating to the Group.
- 4.2. The Policy addresses the following areas:
- 4.2.1. Inside Information
  - 4.2.2. Insiders
  - 4.2.3. Insider Trading
  - 4.2.4. Inside Information of other companies
  - 4.2.5. Record Keeping
  - 4.2.6. Access, Data Confidentiality and Data Privacy
- 4.3. Queries and concerns can be raised by sending an email to [thirdpartyqueries@aldar.com](mailto:thirdpartyqueries@aldar.com).

### 5. COMPLIANCE

- 5.1. The Policy strives to enable the Group to comply with insider trading relevant laws and regulations and adhere to the UAE regulatory authorities governing the implementation of these laws and regulations.

- 5.2. In addition, every entity / sub entity of the Group, located in a jurisdiction outside of the UAE must follow their respective local laws and regulations as required by the jurisdictional supervisory authority of that particular jurisdiction.
- 5.3. Violations of the Policy may result in corrective action, including Disciplinary Action by management consistent with the severity of the incident and potentially even punitive and legal proceedings if required by law.
- 5.4. If you have a suspicion or concern about conduct that may be in breach of the Policy, any other illicit or unethical behaviour, you must immediately report this by email to [thirdpartyqueries@aldar.com](mailto:thirdpartyqueries@aldar.com) or anonymously through the Group's whistleblower program "AWARE".

## **B. POLICY STATEMENTS**

## 1. INSIDE INFORMATION

- 1.1. Aldar Properties PJSC (“Aldar”) is a public joint stock company listed on the Abu Dhabi Securities Exchange (“ADX”) and regulated by the Securities and Commodities Authority (“SCA”). As a result, it must comply with stringent rules in relation to usage of its Inside Information and trading of its securities based on this information.
- 1.2. Inside Information comprises of:
  - 1.2.1. Material information that is undisclosed or not otherwise made available to the public or non-public information, and
  - 1.2.2. relates directly or indirectly to the Group or to one or more of the Group’s listed securities.
- 1.3. Information ceases to be Inside Information only when it has been disclosed to the public or is no longer material.

## 2. INSIDERS

- 2.1. Insiders have a duty to not disclose the information to others or use that information in connection with securities transactions of the Group.
- 2.2. The Group must develop and maintain a comprehensive list of all Insiders through which it ensures close monitoring, follow up and supervision of the transactions of the Group’s Insiders in accordance with the applicable regulatory requirements.
- 2.3. Insiders’ along with their family member(s)’ trading activities of the Group’s securities are monitored and controlled as they have a fiduciary duty or other relationship of trust and confidence, while in possession of material, non-public information about the security. This also includes any company or trust over or in which the Group’s Representatives or their family member(s) has an interest in.

## 3. INSIDER TRADING

- 3.1. Insider Trading is when an Insider deals (or attempts to deal) in a qualifying investment on the basis of Inside Information relating to the investment in question.
- 3.2. Insiders are prohibited to:
  - 3.2.1. Deal in any securities when in possession of Inside Information which affects their price;
  - 3.2.2. Encourage another to deal when in possession of inside information;
  - 3.2.3. Disclose Inside Information, except in the proper performance of employment, to another person.
- 3.3. Insiders must also confine improper disclosure, misuse of information, manipulating transactions, deception, dissemination of misleading information, and misleading behaviour.

## 4. INSIDE INFORMATION OF OTHER COMPANIES

- 4.1. In the ordinary course of doing business, Insiders may come into possession of inside information with respect to other companies. An Insider must not disclose the information to others or use that information in connection with securities transactions of such other company.
- 4.2. If an Insider is not certain whether it is permissible to trade in the securities of such a company, he/she must raise a query to [thirdpartyqueries@aldar.com](mailto:thirdpartyqueries@aldar.com).

## 5. REPORTING AND MONITORING

- 5.1. All compliance related matters must be reported to the ARCC periodically.
- 5.2. A compliance monitoring program is developed to periodically review the various Business Unit's (BU's) compliance / adherence to the process and systems developed.

## 6. RECORD KEEPING

- 6.1. The Group must keep financial books, records and accounts, and have appropriate internal controls in place which will evidence the business reason for concluding on the relevant cases.

## 7. ACCESS, DATA CONFIDENTIALITY AND DATA PRIVACY

- 7.1. All activities, records, documentation and communication relating to activities and matters under the Policy are strictly confidential and shall be handled in line with the relevant jurisdictional data privacy rules, regulations and policies of the Group.



**C. DEFINITIONS**

<b>Term or Abbreviation</b>	<b>Definition</b>
Aldar Group or Group or Company	Aldar Group / Group / Company which includes Segments/Entities and their Subsidiaries.
ARCC	The Audit, Risk and Compliance Committee.
Board /BoD	Board of Directors.
Employee	Includes temporary, permanent, full-time and part-time employees.
Governing Instrument	Any document that establishes the rules, principles, or guidelines that the Policy must adhere to.
Group's Representatives	Refers to the Board of Directors (BOD), all the Group's employees and the contractual staff.
Insider	Any Group's Representative who has or is likely to have access to Inside Information. A person does not have to be named on an Insider list to be an Insider.
Material Information	Any information, event, decision or fact that may directly or indirectly affect the price or trading movement or volume of the security or may have an effect on the investor's decision.
Policy	An Instrument containing statements of principle, business rules, or general processes that articulate or align with legal, regulatory or organisational requirements, and by which the Company is guided in the management of its affairs and the development of its Procedures.