

Confidentiality of Information Policy

1) Purpose:

Given the confidentiality and sensitivity of the company's operations and the importance of maintaining the secrecy of such information, the company has established a system for all members of the Board of Directors and all its employees to sign a confidentiality agreement.

2) Information Confidentiality Policy:

1. The company commits to having its board members and all employees sign a confidentiality acknowledgment in The Commercial Real Estate Company (K.P.S.C.), which stipulates compliance with the instructions of the Capital Markets Authority concerning information confidentiality and the prohibition of misuse or unauthorized trading of documents, data, and internal information of any kind that relates to the business of the commercial real estate company (the parent company) or its subsidiaries and associates, which they may become aware of by virtue of their position or nature of their work. This includes a prohibition on directly or indirectly transferring this information, exploiting it, or benefiting from it for personal interests or for any other person and/or parties, according to the following:

- Maintaining absolute confidentiality.
- Not copying any information or documents, whether photographic or electronic.
- Adhering to the approved information security policy.
- Not advising others to trade in the shares of the parent company or its subsidiaries or associates.
- Not disclosing information within the company except to individuals authorized to review this information based on the powers granted to them and the nature of their work.
- Not disclosing to shareholders outside of general assembly meetings or to third parties any secrets of the company that one has come to know.
- All information related to the company remains confidential even after the termination of one's relationship with the company for any reason.
- Informing the compliance and governance department immediately in case of any suspicion of leaking unauthorized information about the company.
- Acknowledging that the company has the right to take legal action in case of violation of what is stated in this acknowledgment and commitment.

2. The company is committed to establishing effective contractual arrangements that require other institutions with access to its data and essential information to maintain the confidentiality of that data and information, and not to misuse, transfer, or cause it to be transferred directly or indirectly to other parties, as well as not to incite others to trade in the company's shares based on such data and essential information. These institutions are required to sign a confidentiality agreement that includes:

- The contracting party acknowledges that any data, information, documents, reports, or correspondence provided to it or that may come to its attention, whether directly or indirectly, is for internal use only and must be kept completely confidential. The contracting party may not disclose it to any person without obtaining prior written consent from "Al-Tijaria" except for the purpose required by the applicable laws and regulations in the State of Kuwait. The contracting party undertakes to maintain the confidentiality of the information and not to disclose it or misuse it or transfer it or cause it to be transferred directly or indirectly to other parties.

- According to the conditions outlined below, all confidential information related to the business will be kept strictly confidential until the time when both parties specifically agree to disclose that confidential information. Confidential information shall not apply to information that has become generally available to the public without breaching the parties' obligations under this agreement.
- The contracting party must notify "the business" of any information disclosed in accordance with the applicable laws and regulations in the State of Kuwait, and in case of violation, the business retains all its legal rights and compensation if applicable.
- The contracting party must ensure that all information related to "the business" is kept secure. The contracting party will provide "the business" with the names of individuals who will be able to access this information.

3) Procedures for Commitment to Information Confidentiality:

- 1- The Group's Human Resources Department shall have all company employees sign a confidentiality agreement and keep a copy of the agreement in the employees' file, providing a copy of these agreements to the Compliance and Governance Department.
- 2- The Secretary of the Board of Directors shall have all company board members sign a confidentiality agreement and keep it, providing a copy of these agreements to the Compliance and Governance Department.
- 3- The Compliance and Governance Department shall ensure that the board members and all company employees have signed the confidentiality agreement and maintain a record of this, updating it periodically.
- 4- The Group's Legal Affairs Department shall establish effective contractual arrangements that require other institutions with access to their essential data and information to maintain the confidentiality of such data and information and to sign a confidentiality agreement.