

Summary of the

# Disclosure & Transparency Policy

The Commercial Real Estate Company

November 2025

### General Introduction of the Disclosure and Transparency Policy:

The Commercial Real Estate Company is committed to applying the disclosure and transparency rules in a manner that ensures the best interest of both the shareholders and the company as part of its framework. The Board of Directors, according to its duties and responsibilities, has adopted the disclosure and transparency policy to ensure the accuracy and integrity of the data and information to be disclosed. This is achieved by establishing mechanisms for accurate and transparent presentation and disclosure, while defining the aspects, areas, and characteristics of disclosure, whether related to the topics or elements that must be disclosed. It also involves applying the disclosure rules and requirements as stipulated in the laws and regulations issued by the Capital Markets Authority (CMA) and other relevant regulatory requirements, in accordance with the Capital Markets Authority Law & its executive regulations, the Kuwait Stock Exchange rules and its resolutions.

The methods of disclosure included the disclosure of financial and non-financial information and data related to the company's financial position, performance, and ownership, through appropriate disclosure means that allow for full transparency of all information and data in a timely manner to all stakeholders without discrimination. The Board of Directors has ensured that the data and information are accurate, correct, and not misleading. These methods included mechanisms for classifying the information to be disclosed in terms of its nature (financial information, non-financial information) or in terms of the frequency of disclosure, in addition to material information, which is to be reviewed periodically to ensure it aligns with the best international practices in this regard, as well as consistency with what is implemented by the authority. To ensure the implementation of this policy, reporting systems were prepared that include identifying the information that must be disclosed, and the mechanism for classifying it according to its nature or the frequency of disclosure, in accordance with the company's disclosure and transparency procedures and systems.

### Scope of Application:

The policy is considered part of the company's framework, and the provisions of disclosure and transparency apply to The Commercial Real Estate Company as a listed company, as well as being an insider and having insiders, and also as a beneficiary and having subsidiaries and associates. It also applies to members of the Board of Directors, executive management, and employees, as each party has a duty to implement disclosure and transparency within the company. It is essential that all board members, executive management members, and employees carefully understand the requirements of this policy, the applicable laws and regulatory requirements in order to comply with its contents.

### The Objective of this Policy:

One of the main goals sought by the Board of Directors in this policy is to ensure that specialists at " The Commercial Real Estate" are familiar with the practical application mechanism of disclosure and its concept, in accordance with what is stipulated in the 10<sup>th</sup> Book of CMA Bylaws (Disclosure and Transparency). It also aims to ensure familiarity with the mechanism for disclosing material information and insiders transactions in a proper manner and at the appropriate time. Additionally, the policy seeks to clarify best practice applications of what is stated in CMA Bylaws regarding the disclosure

of interests and material information and insiders, in a way that contributes to compliance with the instructions of the regulatory authorities in the State of Kuwait, represented by implementing a full and proper disclosure policy that achieves fairness and transparency and prevents conflicts of interest and the misuse of insider information.

#### Definition of Disclosure in General Terms:

Providing information, facts, and details related to the company or its issues that may affect its stock prices, to all current and potential shareholders and investors, about the facts, using approved disclosure methods and at the appropriate timing, while clarifying the impact on the company's financial position.

#### The Importance of Disclosure

The company believes in the importance of disclosure, as it promotes fairness and transparency, and prevents conflicts of interest and the misuse of insider information. It also enables current and potential shareholders and investors to make their investment decisions by providing them with sufficient and accurate information about the company in an appropriate and fair manner. Disclosure helps attract capital due to its impact on investor behavior, as it increases levels of trust and security among investors concerning the financial safety of the company in particular and the financial sector in general, by allowing investors to access all aspects related to the company's operations and financial data.

#### Disclosure Methods:

- Approved forms by the Capital Markets Authority are used to publish material information, significant influential decisions, interim and annual financial reports, and other general company information.
- The company discloses information through the Capital Markets Authority's electronic disclosure system and the Kuwait Stock Exchange (Boursa) website.
- The company publishes all material information disclosures on its website after posting them on the Kuwait Stock Exchange (Boursa) website.
- It is also prohibited to publish any information on social media or newspapers before posting the disclosure on the Boursa website.

#### Disclosure Timing:

The company discloses material information immediately, as follows:

1. If the information becomes available during the working hours of the Capital Markets Authority and the Kuwait Stock Exchange (Boursa), disclosure must be made as soon as the material information is available, taking all necessary precautions to prevent information leakage before disclosure.
2. If the information becomes available outside the working hours of the Capital Markets Authority and the Kuwait Stock Exchange (Boursa), disclosure should be made at least fifteen minutes before the start of the next trading session after the material information becomes available.

### General Disclosure Obligations:

The Compliance and Governance Department has been established, and its framework regarding disclosure includes the following:

- Ensuring coordination among all parties involved in disclosure and confirming that all departments provide the necessary information to prepare disclosures and review them in a timely manner, in accordance with disclosure and transparency requirements.
- Posting disclosures on the Capital Markets Authority and the Kuwait Stock Exchange's (Boursa) websites, with the authority to upload and activate disclosures distributed among multiple people, so that one person uploads the disclosure while another approves its publication.
- Responding to inquiries from The Capital Markets Authority and the Kuwait Stock Exchange (Boursa) regarding disclosures.
- Ensuring that all insiders comply with signing the relevant declarations (confidentiality declarations, securities dealing and pre- and post-deal disclosure declarations, etc.).
- Preparing the insiders register, which includes all information received in disclosures from insiders, and updating this register as new disclosures are received. Any person may view this register during official working hours.
- Preparing a record of all disclosures published on the Kuwait Stock Exchange (Boursa), showing the disclosure, its classification, and the date of publication.