ELSEWEDY ELECTRIC

Group Insider Trading policy

V.2

2025

Table of Contents

1 INTRODUCTION 3
1.2 Policy Statement 3
1.2 Policy Objective 3
1.3 Scope 3
2 POLICY REQUIREMENTS 4
2.1 Pre-Clearance of Trades 4
2.2 Blackout Period 4
2.1 Insiders 4
2.2 Restricted Insider 5
2.3 Material Non-Public Information 5
4 PROHIBITED ACTIVITIES 6
4.1 Trading based on MNPI 6
4.2 Tipping 6
4.3 Public Communication 6
4 REPORTING OF CONCERNS 6
5 TRAINING AND AWARENESS 6
6 ANNUAL ATTESTATION 7
7 POLICY OWNER 7
8 POLICY REVIEW 7
9 VERSION CONTROL 7

1 INTRODUCTION

This Insider Trading Policy (the 'Policy') establishes the standards and guidelines regarding transactions in ELSEWEDY ELECTRIC "**EE**" Stocks. The laws governing insider trading are complex, and the consequences of violating them, for both the individual and the Company, are severe, including civil and criminal penalties, fines and/or imprisonment.

This Policy is designed to prevent insider trading, avoid the appearance of improper conduct, and protect EE reputation and integrity.

1.2 Policy Statement

It is EE's policy that no Covered Person[1] who possesses Material Non-Public Information "**MNPI**" about the company may:

1. Buy or sell EE stocks on the basis of MNPI.
2. Disclose MNPI to any other person ("tipping") who may then trade based on the information.
3. Assist anyone engaged in the above activities.

The above prohibitions also extend to trading in the securities of any other publicly traded company if the Covered Person possesses MNPI about that company obtained in the course of their work (**e.g.,** information related to unpublished merger or acquisition target, customer…)

Violations of this policy will result in disciplinary action, including dismissal, and may lead to prosecution under applicable laws.

1.2 Policy Objective

The purpose of this Policy is to:

- Define the responsibilities of EE and all individuals working on its behalf in relation to Insider Trading.
- Establish measures to prevent any unauthorized trading, tipping, or misuse of information that might have an impact on the company's share price,
- To ensure compliance with the listing rules of the Egyptian Exchange authority and avoid the legal and financial implications associated with violations of the listing laws and regulations, and
- To avoid improper conduct on the part of anyone employed by or associated with EE.

1.3 Scope

This Policy applies to all EE operations worldwide, all EE subsidiaries, and to every EE employee, agent, contractor, consultant, distributor, supplier or joint venture partner working with the EE or on its behalf ('**Covered Persons**').

This policy is intended for ELSEWEDY ELECTRIC Holding Company listed in the Arab Republic of Egypt and follows the listing rules and regulations of the Egyptian Stock Exchange, the Egyptian Financial Supervisory Authority, and the Egyptian Capital Market Law No.95 of year 1992.

Whilst this policy represents the minimum procedural requirements, a more restrictive approach can be adopted by local EE subsidiaries where necessary[2] to comply with any applicable local laws. In case of conflict between this policy and local legislation, the matter must be submitted to Group Compliance.

[1] Refer to section 1.3 Scope.
[2] If the subsidiary is listed in a different country.

2 POLICY REQUIREMENTS

2.1 Pre-Clearance of Trades

Restricted insiders who wish to trade EE shares must request pre-clearance from the Investor Relations Department. This form is required by the Egyptian Exchange requiring restricted persons to disclose the following information:

- Company name,
- Employee name,
- Type of Trading (sell or buy),
- Volume of security to be traded,
- Percentage of shares owned before and after execution of trade,
- Approved trading window, and
- Broker information.

The Investor Relations Department will review the pre-clearance form to assess if the request will be approved.

Insiders **are prohibited** from trading prior to receiving pre clearance approval.

2.2 Blackout Period

The blackout period for trading EE shares is **five (5) days** prior to any corporate release of MNPI and **one (1) day** after the release has been made available to the public as per Article No. 38 of the Egyptian Exchange regulations.

The Investor Relations Department will announce blackout periods to all employees, executives, and board members through companywide emails.

During blackout periods, all restricted insiders are **prohibited** from trading EE shares.

2.1 Insiders

Insiders are any individual having access to any of the company's internal information including but not limited to the following:

- Employees of EE and its subsidiaries,
- Spouses and minor children of any employee working in EE Holding Company or any of its subsidiaries, and
- All third-parties (service providers, contractors, suppliers, brokers, etc.).

Insiders must not disclose any material nonpublic information related to EE. If an insider has a question as to whether information is considered MNPI, the insider is required to consult the Investor Relations Department or Group Compliance.

All insiders who have the intention to buy or sell EE shares must identify themselves to the Investor Relations Department prior to initiation of any activities on the stock market.

All executives and senior management of the entity and its subsidiaries must report any projects with a value of more than 200 million EGP or its equivalent in other currencies, to the Investor Relations Department in which Elsewedy Electric or any of its subsidiaries is participating in the tender.

All Commercial Team employees are required to communicate the signing date of contracts with a value of more than 200 million EGP to the Investor Relations Department.

2.2 Restricted Insider

Restricted insiders are those who have a higher possibility of possessing material nonpublic information due to the nature of their role within the organization. All of the following are considered restricted insiders:

- All members of the Board of Directors, Group Chief Executive Officer, Group Chief Financial Officer, Chief Executive Officers;
- General Managers of all subsidiaries, Chief Financial Officers of all subsidiaries, All other C-Level business executives and directors in the holding company and subsidiaries;
- Investor Relations Department, Legal Department, Group Compliance, Business Development, Commercial Team employees in the Holding Company;
- Internal Audit Department employees,
- Employees involved in the bidding process during tenders;
- Employees who communicated interest/intention to trade company shares, and First-degree relatives of all the above.

The Egyptian Exchange requires the Investor Relations Department to provide a list of all restricted insiders in the organization and the information relevant to trading activities.

Restricted insiders are required to obtain pre-clearance of trade from the Investors Relations Department prior to engaging in any transaction involving the purchase or sale of Elsewedy Electric shares.

2.3 Material Non-Public Information

Identifying all categories of MNPI is not possible. Different judgements may be made by the public, the media, and the courts regarding what is considered MNPI. Release of information to the media does not immediately mean the information has become publicly available, the source of the information must be considered.

Covered Persons must assume information is MNPI, unless the following has occurred:

- The Investor Relations Department has submitted a disclosure to the Egyptian Exchange,
- An official public announcement has been made by a spokesperson/representative of the organization.

MNPI includes but not limited to the following:

- Any business acquisitions, mergers, joint ventures, upcoming projects,
- Unpublished Financial Results,
- Corporate actions related to shares such as: stock splits and shareholder divestment,
- Business Partners, Sources of Funding, Changes in management, financial forecasts and significant business trends/Budgets,
- Any legal disputes/investigations involving the company.

MNPI related to EE or any of its subsidiaries across all operational countries must remain confidential. Insiders are prohibited from sharing MNPI with anyone who does not have access to it, including colleagues, family members, friends, third parties, or any other persons, through written, oral, or electronic means.

Announcing MNPI has a direct impact on the organization's share price and the organization's reputation, therefore affecting organizational performance and objectives, corporate investments, performance in project tenders, and profitability.

If an insider has doubts related to whether the information has been made public, they are required to consult the Investor Relations Department to clarify the situation.

4 PROHIBITED ACTIVITIES

4.1 Trading based on MNPI

Insiders are strictly prohibited from:

- Engaging in any transactions directly or indirectly involving the purchase or sale of EE shares while in possession of MNPI.
- Engaging in any transactions directly or indirectly involving the purchase or sale of another listed company's shares while in possession of MNPI that they have become aware through the course of business.
- Engaging in any transactions directly or indirectly involving the purchase or sale of EE shares during Blackout Periods announced by the Investors Relations Department.

Any insider who engages in insider trading will be subject to disciplinary action, civil, and/or criminal penalties.

4.2 Tipping

Insiders are also prohibited from:

- Making recommendations, or giving opinions on trading EE shares based on MNPI.
- Disclosing material nonpublic information to third parties including family members, friends, or anyone who does not have access to the MNPI.

If any party trades EE shares based on MNPI as a result of tipping, both the trader and the tipper will be liable for legal and financial penalties.

4.3 Public Communication

Insiders must refrain from:

- Posting on social media (**e.g.,** Facebook, Twitter, LinkedIn, etc.) any information related to upcoming projects, deals, potential partners, and any other non-public information unless the Investor Relations Department has announced this information through an official outlet.
- Speaking with reporters or reaching out to newspapers regarding any MNPI until the organization has made a public disclosure through official channels.
- Commenting on share price movement or rumors of other corporate developments unless it is a part of their job description (e.g., Investor Relations) or they have been specifically pre-authorized by the Chief Executive Officer of EE Holding Company.

4 REPORTING OF CONCERNS

All EE employees must report suspected breaches of this policy to their line managers, Investor Relations Department and Group Compliance through:

- **Online Portal** - Speak up (https://compliance.elsewedy.com/)
- **Email** (compliance-int@elsewedy.com)
- **Mail** (Plot No. 13co3, Cairo Festival City- business Park, 5th Settlement, New Cairo, Egypt)

5 TRAINING AND AWARENESS

Group Compliance will develop, implement and regularly review Insider Trading training programs to all employees and third parties performing services on behalf of EE. All Covered Persons must participate in any compliance training when offered. Refresher training may be required for high-risk functions.

6 ANNUAL ATTESTATION

All employees will be required to attest upon joining the group and then annually, that they have read, understood, and will observe the requirements of our Code of Conduct and compliance policies, including the Insider Trading Policy.

Additionally, all employees are required to annually attest (electronically) to their position regarding the possession or non-possession of EE stocks (or equivalent securities) relevant to their current position. This attestation must be completed and submitted by a date specified by the Group Compliance or Investors Relations Department each fiscal year.

7 POLICY OWNER

Group Compliance is the owner of this policy.
Questions and feedback regarding this policy must be submitted to Group Compliance: compliance-int@elsewedy.com

8 POLICY REVIEW

This policy shall be reviewed annually and/or when deemed necessary.

9 VERSION CONTROL

Title of document	Group Insider Trading Policy		
Version Control	V.1.1	March 2024	Policy Draft
	V.1.3	November 2024	Policy revision
	V.2	07/Dec/2025	Policy template update.
Document Drafted by	Group Compliance		
Document approved by	Group CEO and Group CLCO		
Date of next review	December 2026		