



Insider Trading Policy Statement

PURPOSE

The purpose of this Insider Trading Policy statement is to establish guidelines to prevent insider trading and ensure compliance with applicable laws and regulations. This policy statement aims to protect the integrity of the financial markets and maintain the trust of our stakeholders by preventing the misuse of material non-public information.

SCOPE

This policy applies to all AD Ports Group relevant persons (employees including seconded employees, group, and cluster board members and third parties representing the group) and any other individuals with whom the Group transacts, as well as their immediate family members and any entities they control. It covers all transactions in the company's securities, including common stock, options, and any other financial instruments related to the company's securities.

POLICY STATEMENT

A. Prohibition on Insider Trading

- No person covered by this policy may trade in the company's securities while in possession of material non-public information.
- Material non-public information is any information that could reasonably be expected to affect the price of the company's securities or that a reasonable investor would consider important in making an investment decision. Examples of material non-public information include, but are not limited to, financial results, significant business developments, mergers and acquisitions, and changes in senior management.

B. Trading Windows and Blackout Periods

- Trading in the company's securities is only permitted during designated trading windows, which are typically open for a limited period following the release of the company's quarterly and annual financial results.
- Blackout periods are times when trading is prohibited due to the possession of material non-public information. These periods may be imposed around the time of significant corporate events or announcements.

C. Pre-Clearance of Trades

- Those individuals included in the AD Ports Group insiders list, such as directors and senior executives, shall obtain pre-clearance from the Risk & Compliance Department before engaging in any transactions involving the company's securities. The pre-clearance process helps ensure that trades are not made while in possession of material non-public information.

D. Reporting and Compliance

- All Group Employees must report any suspected violation of this policy to the Risk & Compliance Department immediately.
- The company will investigate any reported violations and take appropriate disciplinary action, which may include termination of employment and legal action.

E. Education and Training

- The company will provide regular training and education on insider trading laws and this policy to all relevant persons.
- Employees are encouraged to seek guidance from the Compliance Department if they have any questions or concerns about this policy.

Mohamed Juma Al Shamisi
MD & Group CEO - AD Ports Group