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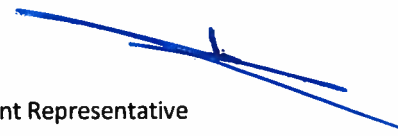
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KEY PERSONS DEALING POLICY

1.1. PURPOSE


- Following the listing of the ordinary shares of the Company ("Ordinary Shares") on the Bahrain Bourse ("BB") and the listing of Global Depositary Receipts in respect of the Company's shares ("GDRs") on the London Stock Exchange – Alternative Investment Market (AIM) in November 2010, the Company implemented certain processes in relation to the control of Company information and trading by certain persons associated with the Company in the Ordinary Shares and GDRs. Hence, regulations of two jurisdictions apply to the Company – Kingdom of Bahrain and United Kingdom.
- This policy aims to govern dealings in Ordinary Shares and GDRs (or other listed securities, if any) of Aluminium Bahrain B.S.C. ("ALBA" or "the Company") by ALBA's Key Persons which includes Board of Directors, senior management and such other persons as decided by the Company to have access to insider information from time to time. These rules are being formulated in accordance with the ["Guidelines on Issuers' Key Persons Dealing Policies accepted for trading in the Bahrain Bourse \("BB"\)"](#) issued by Bahrain Bourse ("BB") which is effective from 1st December 2010.
- Dealing in the securities of a listed company while in possession of inside information is illegal according to [Chapter 1 of Part 5 \(particularly Article 100\) of the Central Bank of Bahrain \("CBB"\) Law](#) in addition to the [CBB's rulebook volume \(6\) "Market Abuse and Manipulation"](#) which prohibits such abuse of inside information.



1.2. SCOPE

- These Policies and Procedures apply to Key Persons of ALBA, including senior management and directors, their connected or controlled persons, and all external parties qualifying as Key Persons. Key Persons will be advised of their qualification by the Corporate Secretary who is in charge of the Register.
- The prohibition against abuse of inside information and confidentiality applies to all persons who possess inside information regardless of the source and manner in which the information has been received.

1.3. COMPLIANCE OBLIGATIONS

Please refer to [section 1.6](#) for detailed compliance obligations and [section 1.11](#) for specimen of forms to be filed with the Exchange.

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1.4. DEFINITIONS

1.4.1. Exchange

Bahrain Bourse (previously referred to as Bahrain Stock Exchange)

1.4.2. Issuer

Any issuer's securities accepted for trading in the Exchange.

1.4.3. Dealing

"**Dealing**", where referred to in these Guidelines, includes (whether as principal or agent) making or offering to make with any person, or inducing or attempting to induce any person to enter into or to offer to enter into an any agreement for or with a view to acquiring, disposing of, subscribing for, or underwriting securities of the issuer. To be clear, dealing includes (but is not limited to) on-Exchange and off-Exchange transactions, including subscriptions of securities of the Issuer, as well as transactions relating to securities of the Exchange - listed Issuer that are quoted on another Exchange.

1.4.4. Dealing Policy

"**Dealing Policy**" shall refer to each Issuer's Key Person Dealing Policy adopted pursuant to this directive/ruling/regulation.

1.4.5. Guidelines

"**Guidelines**" shall refer to the Exchange Guidelines on Issuers' Key Person Dealing Policies.

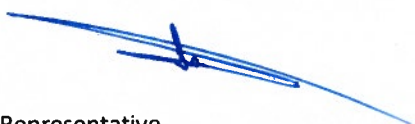
1.4.6. Inside Information



"Inside Information", as defined in [MAM-B.2.10](#), means information that;

- Is precise in nature relating directly or indirectly to one or more of the securities of the issuer thereof;
- Has not been made public;
- If made public, is likely to have a significant impact on the price of those securities or their derivatives.
- Is, directly or indirectly, related to derivatives of commodities which the traders expect to be disclosed according to the market regulations.

1.4.7. Key Persons

"**Key Persons**" of the Company refers to members of the Company's Board of Directors and Executives of the Company, the Company itself, and such other persons as decided by the Board to have access to inside information relating to the Company from time to time. Other persons include Corporate Secretary, Chief Internal Auditor and Risk Officer as well as Legal Manager.

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While key persons may have access to inside information from time to time by nature of their duties performed, they do not necessarily always possess inside information. This fact distinguishes key persons from insiders. Dealing by key persons of the Company, therefore, does not necessarily constitute insider trading.



1.4.8. Register of Key Persons

"Register of Key Persons" refers to a register maintained by the Issuer which includes basic personal data of Key Persons and information on their holdings and dealings in the Issuer. The Register of Key Persons is maintained at the Issuer's headquarters and updated by the Corporate Secretary.

1.5. RESPONSIBILITIES AND ACCOUNTABILITIES

Department	Responsibilities and Accountabilities
Board of Directors	<ul style="list-style-type: none"> Endorse the Key Person Dealing Policy on a firmwide level
Corporate Secretary	<ul style="list-style-type: none"> Ensure the Key Person Dealing Policy is implemented by Alba's Key Persons Act as a point of contact on all matters pertaining to Key Person Dealing Policy Report to Board of Directors on aspects pertaining to Key Persons Report to Bahrain Bourse on all aspects pertaining to Key Persons as per regulatory requirements Responsible for maintaining & updating Key Persons Register
Compliance Department	<ul style="list-style-type: none"> Check the Key Persons Register and ensure required compliance regulations are adhered to
Internal Audit Department	<ul style="list-style-type: none"> Undertake periodic audits pertaining to Key Persons and report the findings to Audit Committee

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1.6. POLICY AND PROCEDURES

1.6.1 BAHRAIN REGULATIONS

1.6.1.1 Dealing while in possession of inside information

Any employee who is in possession of inside information shall not use such information to:

- Deal in any securities to which that information relates;
- Encourage any person to deal in any securities to which that information relates;
- Disclose inside information to any other person, otherwise than in the performance of the functions of his employment, office or profession;
- Violate the rules governing the publishing of market information.

Please note that “dealing” includes trading both on and outside of the Bahrain Bourse.

1.6.1.2 Restrictions on Trading during “Close/Silent Periods”

For the purpose of application of the Bahrain regulations, when there is a “Close/Silent period”, key persons and their “connected persons” are not permitted to trade at all in the Company’s Ordinary Shares or GDRs.


Following the publication of financial statements by a company, Permanent Insiders of that company must refrain from trading and wait until the commencement of the following day’s trading session, or after 24 hours, whichever is less, after the publication of the financial statements have been released in the local newspapers in line with [MAM 2.14.2](#).



In any event, key persons and their “connected persons” must comply with the procedure as stated in [Article 40 – Transactions by Directors and Senior Management of the Central Bank of Bahrain Disclosure Standards](#).

For these purposes, “connected persons” means:

- (a) spouse, son, adopted son, step-son, daughter, adopted daughter, step-daughter, father, step-father, mother, step-mother, brother, step-brother, sister or step-sister, or other person under your guardianship or control; or
- (b) a firm or a corporation in which your and/or any of the persons mentioned in sub-paragraph (a) above has control of more than 10% of the voting power in the firm or corporation, whether such control is exercised individually or jointly.

In addition, key persons and their connected persons should refrain from trading in the Company’s Ordinary Shares or GDRs for a certain period following the dissemination of “material information” by the Company. They must wait until the earlier of (i) commencement of the following day’s trading session (i.e. until 09:30 AM of the next trading day following dissemination of the information or at such other Trading Period as

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determined by Bahrain Bourse or (ii) 24 hours following the general publication of the information in a national publication starting from the official working hours of the Bahrain Bourse (i.e. 7.30 AM) whichever is less, after the publication of the financial statements have been released in the local newspapers in line with [MAM 2.14.2](#).

For these purposes, “material information” means “information of a factual nature that bears on the value of an issuer’s securities, or on decisions as to whether or not to invest or trade in such securities, should be disclosed. Included is information known to the Company concerning the issuer’s property, business, financial condition and prospects; mergers and acquisitions; and dealings with employees, suppliers, customers and others; as well as information concerning significant changes in ownership of the issuer’s securities owned by insiders or representing control of the issuer.”

1.6.1.3 Notifications of dealing

- Provided he/she is not in possession of inside information, Key Persons may deal in securities of the Company in line with the [Section 3.2.1 of the Bahrain bourse Key person dealing framework](#).
- Key Persons are required to advise the (Person In-Charge of Register) for its records on details of the dealing by the end of the next business day following the completion of the dealing. The Company shall immediately file with the Exchange such notifications by Key Persons by using Form KP2 in line with the [Section 3.2.2 of the Bahrain bourse Key person dealing framework](#).
- The Exchange reserves the right to disseminate to the public, the dealing information as per the rules and regulations issued by the CBB in line with the [Section 3.2.3 of the Bahrain bourse Key person dealing framework](#).

1.6.1.4 Maintenance of a Register of Key Persons

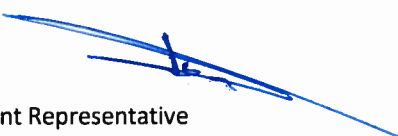
The Corporate Secretary shall at all times maintain an updated Register of Key Persons containing the following:



- a) Basic personal data of Key Persons of ALBA;
- b) Key Person’s holdings and interests in ALBA securities; and
- c) Details regarding dealings by Key Persons in securities of ALBA.

Key Persons are required to notify the Company promptly (within 5 business days) of any changes to the personal data as described above, so that the Company may inform Bahrain Bourse within the required time period (10 business days) in line with the [Section 3.4 of the Bahrain bourse Key person dealing framework](#) and [6. Declaration and Maintenance of a Register on Insiders | Rulebook \(thomsonreuters.com\)](#).

1.6.1.5 Notification to the Key Persons

- The Key Person shall be notified of his/her status as soon as he/she becomes a KP upon appointment, election or employment with the issuer and shall sign the KP forms to this effect.


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- The Board of Directors shall be notified of their designation as Key Person by the Corporate Secretary. All other Key Persons are notified of their designated status as Key Person by the Corporate Secretary who is in charge of the Register.
- The Key Person shall receive an email with the Key Persons Policy, Insider Policy in line with the [Declaration and Maintenance of a Register on Insiders of Central Bank of Bahrain](#) and **KP1: (Part 2 & 3)**. The Key Person is requested to submit the completed and signed **KP1: (Part 2 & 3)** forms within 10 calendar days.



1.6.1.6 Notifications to the Exchange on Register of Key Persons


- **Periodic Reporting of the Key Persons register.** The Corporate Secretary who is in charge of the Register shall submit an updated and complete Register of Key Persons to the BB, using the **KP1: Part 3 form** as below:
 - a) Not more than 10 calendar day after the conclusion of the Company's Annual General Meeting (in case of changes) in line with [MAM 2.15.6](#) and [Section 3.4 of the Bahrain bourse Key person dealing framework](#); and
 - b) At the end of each month in line with [MAM 2.15.6](#) and [Section 3.4 of the Bahrain bourse Key person dealing framework](#).
- **Addition of a Key Person.** The Corporate Secretary who is in charge of the Register shall submit the **KP1: (Part 2 & 3)** to the Exchange physically and electronically beginning of the following month from such appointment.
- **Changes in the Particulars/Holdings of a Key Person.** The Corporate Secretary who is in charge of the Register shall notify the Exchange changes in the particulars or holdings of existing Key Persons using **KP2 Form (Appendix 1.11.4)** immediately pursuant to such change.
- **Removal of a Key Person.** The Corporate Secretary who is in charge of the Register shall notify the Exchange of the removal of the Key Persons by providing them with the updated Key Persons Register list which is submitted physically and electronically in the beginning of following month.
- The Corporate Secretary shall submit the **KP1: Part 3 form** to the Exchange physically and electronically within 10 calendar days of the conclusion of the Company's AGM, in case the Key Persons register included changes not reported earlier as part of the monthly reporting in line with [MAM 2.15.6](#) and [Section 3.4 of the Bahrain bourse Key person dealing framework](#).



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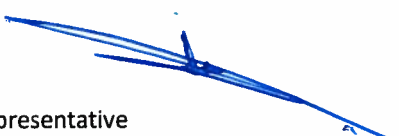
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<ul style="list-style-type: none"> • Upon request by the Exchange. The Corporate Secretary in charge of the Register shall submit an updated and complete KP1: Parts 1, 2 and/ or 3 as soon as practicable. <p>1.6.2 UNITED KINGDOM REGULATIONS</p> <p>1.6.2.1 Restrictions on Trading by Certain Persons</p> <p>As per UK regulations, all persons discharging managerial responsibilities in the Company or its subsidiaries ("Restricted Persons") must comply with the Model Code on dealings in securities, set out in the Listing Rules. Accordingly, no trading in the Company's securities or any related securities is permitted in any circumstances:</p> <ul style="list-style-type: none"> (a) at any time you are in possession of inside information or other relevant information that is not generally available (see below); or (b) in any other circumstances where such trading would constitute market abuse/market manipulation (see below). <p>In addition to the general prohibition above, no trading in the Company's securities or any related securities is permitted:</p> <ul style="list-style-type: none"> (a) during close periods (see below) by those listed on the Insider List ("Restricted Persons") (see below); or (b) at any time outside close periods by Key Persons, unless prior clearance is given by the appropriate person (see below) and a post-trade notification is given to the "Director – Investor Relations, Insurance & Corporate Secretary"; and by Restricted Persons who are not Key Personnel, unless a post-trade notification is given to the Dealing Compliance Officer. <p>If at any time, you are unsure about whether you are permitted to deal in the Company's securities, you may seek clearance from the Compliance Officer. Details of how clearance for dealing in the Company's securities may be obtained, and how to provide a post-trade notification to the Compliance Officer, are set out below.</p> <p>1.6.2.2 Close/Silent Period</p> <p>During certain Close/Silent Periods (listed below), Restricted Persons must not trade in, or otherwise deal with, the Company's securities or any related securities. The Compliance Officer will notify you of the commencement of a close period.</p> <p>Generally, Close/Silent Periods are:</p>			



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<p>(a) if the Company makes a preliminary announcement of the Company's annual results, the period of 60 days immediately preceding a preliminary announcement of the Company's annual results or, if shorter, the period from the end of the relevant financial year up to and including the time of the announcement; or</p> <p>(b) the period of 60 days immediately preceding the publication of its annual financial report or, if shorter, the period from the end of the relevant financial year up to and including the time of such publication;</p> <p>(c) if the Company reports on a half yearly basis, the period from the end of the relevant financial period up to and including the time of publication of its half yearly reports; and</p> <p>(d) if the Company reports on a quarterly basis, the period of 30 days immediately preceding the announcement of the quarterly results or, if shorter, the period from the end of the relevant financial period up to and including the time of the announcement.</p> <p>For these purposes, your "connected persons" means:</p> <p>(i) a member of your immediate family (including a spouse, civil partner, child or step-child under 18 years of age);</p> <p>(ii) any other relative who, on the date of the relevant transaction, has shared the same household as you for at least 12 months;</p> <p>(iii) a body corporate that is at least 20% owned or controlled by you or a connected person (whether together or separately);</p> <p>(iv) any trustee of a trust (excluding an employees' share scheme trust or a pension scheme) of which you or your connected person is a beneficiary;</p> <p>(v) your or your connected person's business partners; or</p> <p>(vi) a firm in which you or your connected person is a partner.</p> <p>You are required to provide the Company with the names and contact details of your 'connected person' and to update this information should those connected persons change. You are also required to inform your connected persons of their disclosure obligations and to provide them with a copy of this policy.</p> <p>1.6.2.3 Notification of Trading</p> <p>You must notify the Company of any trading in Ordinary Shares or GDRs of the Company by you or any of your 'connected persons' on your or their own account within four business days following the day on which the trading occurred.</p>			

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<p>The notification to the Company must contain the following information:</p> <ul style="list-style-type: none"> (i) your name and, where applicable, your connected person; (ii) the reason for responsibility to notify; (iii) the name of the Company; (iv) a description of the relevant security (Ordinary Share or GDR); (v) the nature of the transaction (e.g. purchase or sale); (vi) the date and place of the transaction; (vii) the price and volume of the transaction; and (viii) number of shares held in the Company. <p>Refer to Appendix – 1.11.5 (Memorandum on Inside Information), which forms an integral part of this Policy.</p> <p>1.6.3 AVAILABILITY OF THE POLICY</p> <p>The approved policy will be made publicly available on ALBA’s website and a copy of the approved policy will be made available to all key persons.</p> <p>1.6.4 VIOLATIONS</p> <ul style="list-style-type: none"> • Any conduct that contravenes the provisions of this Policy will be dealt with strictly and in line with in line with the Section 5 “Violations and penalties” of the Bahrain bourse Key person dealing framework. • Any violation of the Policy by Key Persons employed by or under contract with the Company including directors, employees, consultants or contractors, may result in action being taken to terminate their service. The Corporate Secretary / Corporate Governance Officer shall report any to the Chairman of the Board of Directors • The Corporate Secretary / corporate governance officer shall notify the Nomination Remuneration Corporate Governance Committee if any violations to this Policy. • In case of violation by Key Persons pertaining to this policy, the Corporate Secretary shall notify the Exchange immediately. <p>1.7. REPORTING</p> <p>Refer to section 1.6.1.5 for reporting requirements.</p>			

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1.8. RECORD KEEPING


Refer to [section 1.6.1.3](#) for record keeping requirements.



1.9. FAQs

Not Applicable

1.10. REVIEW

The policy shall be reviewed on an annual basis and any modifications to the contents of the current version shall take effect only if these modifications are approved by the Board of Directors of the company.

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1.11. APPENDIX

1.11.1 Form KP1 (Part 1) – Register of Key Persons (Company's Authorized Representative Information)

استمارة سجل الأشخاص الرئيسيين (KP1)



Form Register of Key Persons (KP1)

Company's Authorized Representative Information (Part 1)

بيانات الشخص للخل بالتوقيع عن الجهة الصادرة (الجزء الأول)

Name of Issuer:		اسم الجهة للصدرة	
Submitted by:		مقدم من قبل	
Name		الاسم	
Designation		السمي الوظيفي	
Issuer's Stamp:		ختم الجهة للصدرة	
Signature		التوقيع	
Date of submission:		تاريخ التقديم	
Day	Month	Year	السنة
			الشهر
			اليوم

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1.11.2 Form KP1 (Part 2) – Particulars & holdings of Key Persons

استمارة سجل الأشخاص الرئيسيين (KP1) Form Register of Key Persons (KP1)

مفردات وملكيّات الأشخاص الرئيسيين¹ - (الجزء الثاني)



Particulars / المفردات								
Name الاسم	Designation الاسم الوظيفي			ID Number رقم الهوية				
Nationality الجنسية	Date of appointment تاريخ التعيين			Passport Number رقم الجواز				
Holdings / الملكيّات								
Security type نوع الورقة المالية	Number of securities عدد الأوراق المالية				Percentage of Holding (%) نسبة الملكية (%)			
	Direct مباشرة	Indirect غير مباشرة	Indirect غير مباشرة	Indirect غير مباشرة	Direct مباشرة	Indirect غير مباشرة	Indirect غير مباشرة	Indirect غير مباشرة
Shares أسهم								
Options خيارات								
Rights حقوق								
Warrants ورانس								
Others أخرى								
Total الجموع								

يرجى تعبئة هذه الاستمارة لكل شخص رئيسي على حدة¹

الختم والتوقيع

Stamp & Signature: _____
Company's Authorized Representative
للخول بالتوقيع عن الشركة

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1.11.3 Form KP1 (Part 3) – Summary of particulars & holdings of Key Persons Register

استمارة سجل الأشخاص الرئيسيين (KP1)
Form Register of Key Persons (KP1)


ملخص سجل مفردات ملكيات الأشخاص الرئيسيين² - (الجزء الثالث) - Summary of particulars & holdings of Key Persons Register² - (Part 3)



Key Person الشخص الرئيسي	Designation السمي الوظيفي	Nationality الجنسية	ID / Passport number رقم الهوية/ الجواز	Person under guardianship / Control of Key Person الأشخاص ذات العلاقة بالشخص الرئيسي		Security type (shares/options/ rights/warrants /others) نوع الورقة المالية (اسهم/ خيارات/ حقوق/ وارننيس /اخرى)	Total holdings مجموع الملكيات
				ID/CR رقم الهوية / السجل التجاري	Name الاسم		

تتم تعبئة هذه الاستمارة من قبل الشخص المخول بالتوقيع عن الجهة المصدرة²

الختم والتوقيع

Stamp & Signature: _____
Company's Authorized Representative
المخول بالتوقيع عن الشركة

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Date: 29.09.2021	 Management Representative

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1.11.4 Form KP2 – Changes to Register of Key Persons

تحديث سجل تعاملات الأشخاص الرئيسيين Changes to particulars and holdings of Key Persons

Form KP2

استمارة KP2



الفردات Particulars						
Name الاسم	Designation السمي الوظيفي	ID Number رقم الهوية				
Issuer's Name: اسم الجهة المصدرة	Nationality الجنسية	Date of appointment تاريخ التعيين	Passport Number رقم الجواز			
تحديث للكتبات/Changes to holdings						
Security type نوع الورقة المالية	Number of securities held before changes عدد الأوراق المالية المملوكة قبل التحديث	Date التاريخ	Number of securities acquired / Disposed or off market عدد الأوراق المالية المشتراة / المباعة أو الحالات للاستثناء	Direct / Indirect مباشرة / غير مباشرة	Number of securities held after changes عدد الأوراق المالية المملوكة بعد التحديث	Percentage of issued share capital (%) نسبة للكتبات من رأس المال (%)
Shares أسهم						
Options خيارات						
Rights حقوق						
Warrants ورانتس						
Others أخرى						
Total المجموع						

برحى كعتبة هدد الاستمارة تكل شخص رئيسي

الختم والتوقيع

Stamp & Signature: _____
Company's Authorized Representative
الخول بالتوقيع عن الشركة

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1.11.5 Memorandum on Inside Information

Memorandum On Inside Information Per United Kingdom Laws And Regulations

You have received this memorandum, which is annexed to the Company's Key Persons Dealing Policy (the "Memorandum") because you have, or are likely to have, access to inside information about the Company [and have been included on the Company's Insider List]. This document and the Memorandum should be read together.

1. APPLICABLE LAWS AND POSSIBLE SANCTIONS

1.1 Insider Dealing Provisions

It is a criminal offence for an individual who has price-sensitive information that has not been made public, which he knows is inside information from an inside source, to deal in securities whose price would be likely to be significantly affected by that information if made public. It is also an offence to disclose inside information other than in the proper performance of the functions of your employment or office, as well as to encourage others to deal.

"Inside information" is specific information relating, directly or indirectly, to the company or to its securities which has not been made public; and, if it were made public, would be likely to have a significant effect on the price of the company's gdrs or underlying ordinary shares.

An individual guilty of insider dealing may be liable to a fine and/or to imprisonment.

1.2 Duty of Confidentiality


You are under a duty of confidentiality in respect of any confidential information you receive (whether about the Company or a third party) and you must not use or disclose such information without due authorisation.



The Company (or others) may take action against you if you breach this duty of confidence, including seeking an injunction to prevent the disclosure of any confidential information or damages for any losses suffered.

1.3 Market Abuse Provisions

It is a civil offence under English law to:

- (a) deal or attempt to deal, on the basis of inside information;

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- (b) engage in behaviour that is abusive to the market, for example, manipulating the price of the Company's securities;
- (c) encourage someone else to deal on the basis of inside information or otherwise engage in market abusive behaviour;
- (d) disclose inside information other than in the proper performance of the functions of employment or office; or
- (e) otherwise misuse relevant information that is not generally available ("RINGA") (see below).

Market abuse is not a criminal offence and therefore it is not punishable with imprisonment. In punishing market abuse, the United Kingdom Financial Conduct Authority may impose unlimited financial penalties, publicly censure a person and make an order to compensate or disgorge profits to affected persons. Injunctions to prevent market abuse (and to freeze assets) may also be available.

If the abusive behaviour falls within the scope of the insider dealing provisions of the United Kingdom Criminal Justice Act, it will be a criminal offence and will be punishable with imprisonment.


It should be noted that RINGA is interpreted as a much broader class of information than the definition of inside information, and RINGA is not specifically defined under English Law. The prohibition of the misuse of RINGA is intended to have a broad application, and civil sanctions pursuant to the market abuse regime might be imposed in circumstances whereby the behaviour in question does not technically breach one of the other heads of market abuse but still represents a failure on the part of the person concerned to observe the standard of behaviour reasonably expected of a person in his position in relation to the market.



If in doubt as to whether information you have constitutes RINGA, speak to the Compliance Officer.

2. INSIDER LIST OBLIGATIONS

Now you are included on an insider list, in addition to the obligations set out in the Memorandum, you must also:

- (a) inform the Director – Investor Relations, Insurance and Corporate Secretary in advance where you propose to communicate inside information on this matter to any person for the first time. It is important that you comply with the communication requirements in section 3 below. If you are not sure whether you should make a particular communication, you should discuss the question with the Director – Investor Relations,

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Insurance and Corporate Secretary. If you are proposing to make a communication outside the Company, you must not do so without the prior agreement of the Director – Investor Relations, Insurance and Corporate Secretary.

- (b) inform the Director – Investor Relations, Insurance and Corporate Secretary of the date when you do communicate inside information to another person; and
- (c) inform the Director – Investor Relations, Insurance and Corporate Secretary of any changes in your personal details (for example, name, personal address, the office in which you are based).

If the person to whom inside information is to be communicated in (a) or (b) is a director or employee of the Company, you need only give their name. In other cases, you must give their name, the name and address of their firm or company and their telephone number.


3. COMMUNICATION REQUIREMENTS

Inside Information should be communicated only on a “need to know” basis. Incidental access to inside information needs to be eliminated so far as possible. In addition to complying with the Company’s requirements regarding Confidential information (as set out in the Code of Conduct, and IT Data Security policy), you should take any additional actions necessary to help restrict access to information that could be deemed to be inside information, for example, by using document or server passwords to protect access to sensitive document; restricting access to persons on a secure distribution list; the use of project code names; the use of sealed non-transparent envelopes for internal circulation of hard copy documents, and by ensuring that sensitive documents are kept locked away.

4. ACKNOWLEDGEMENT

By signing the Memorandum, I acknowledge that:

- a) I have read [Appendix 1.11.5](#);
- b) I am aware of the legal and regulatory duties entailed in having access to inside information (including dealing restrictions in relation to the Company’s GDRs or other financial instruments); and
- c) I am aware of the sanctions attaching to the misuse or improper circulation of inside information.

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