

Insider Trading Policy

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Misr Al Gadida Company

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1. Policy Objectives:

- This policy governs the trading of the Company's employees, members of its Board of Directors, their representatives, their spouses, and their minor children (Insiders) in accordance with the rules of the Egyptian Exchange and the Financial Regulatory Authority.
- Ensuring that all Insiders understand the definition of insider trading and the rules governing it.

2. Definitions

• Insiders:

They refer to the Company's senior managers, members of its Board of Directors, their representatives, their spouses, and their minor children, as well as anyone who is able to obtain or access any of the Company's inside information.

• Trading by Insiders:

Trading in the shares of Misr New Heliopolis Housing and Development Company by the Company's employees, members of its Board of Directors, their representatives, their spouses, and their minor children based on information they obtained that has not yet been disclosed to the public.

• Closed Period:

- It is the period of five days before the event and one day after the material event.
- The closed periods shall be disclosed by Misr New Heliopolis Housing and Development Company.

• Material Events:

These are events that have a tangible impact on the price of the security or changes that significantly affect the Company's performance or financial position, and include the following:

1. Announcement of business results in the quarterly disclosure report.
2. Changes in senior management: appointment or resignation of senior executive officers, or changes in the management structure.
3. Structural changes: mergers and acquisitions, or organizational restructuring operations.
4. Financial events: concluding major transactions, or changes in accounting policies, or incurring significant losses.
5. Legal changes: issuance of court rulings affecting the Company, or changes in laws and regulations.
6. Disclosure of Board of Directors' decisions.
7. Disclosure of General Assembly decisions.

• Inside Information:

Any information related to the Company, its financial results, the transactions it enters into, the projects it implements, or its future plans, including the following:

1. Official information (such as financial reports) or unofficial information (such as internal notes and reports).
2. Information relating to any member of the Board of Directors or any of the Company's employees.
3. Information that has a tangible impact on the Company's performance and consequently on the share price.
4. Information that has not yet been disclosed to the public through official channels.

• **Trading in the Shares of Misr Al Gadida Company:**

Trading in the shares of Misr Al Gadida includes the following:

1. Selling.
2. Buying.
3. Agreement to sell.
4. Agreement to buy.

3. Misuse of Inside Information

3.1 All members of the Board of Directors, the Managing Director, and the Company's employees must not make their decisions related to selling or buying shares of Misr Al Gadida Company based on inside information that has not been disclosed to the public and that affects the share price.

3.2 Misr Al Gadida Company considers the misuse of inside information to achieve gains or avoid losses in trading the Company's shares to be an illegal act.

4. Trading Restrictions

4.1 Prohibition on any of the Insiders and the groups related to them from trading in any securities issued by the Company during five working days before and one working day after the publication of any material information.

4.2 Prohibition on trading by any shareholders who own 10% or more, individually or through the group related to them, except after notifying the Exchange thereof prior to execution.

4.3 Prohibition on trading by members of the Company's Board of Directors regardless of their percentage of ownership in the capital, Company officials, or persons who are able to access information not available to others and that has an impact on the price of the security, whether through buying or selling such securities to which that information relates.

4.4 The Company has prepared a circular for Insiders when trading in the Company's share in accordance with the amendment of Article (38) of the Rules of Listing, Continued Listing, and Delisting of Securities, and after the amendment related to Insider trading. Given the inability to determine in advance the timing of material events that may affect the Company, the Company has notified all Insiders listed in the database on the electronic disclosure system.

4.5 All Insiders, when trading in the Company's shares, must notify the Company through any of the following channels to avoid violating Article (38) of the Rules of Listing and Delisting of Securities on the Egyptian Exchange.

4.6 This procedure aims to avoid trading in shares during periods of material events that may affect the share price or its trading. Accordingly, any person who violates this procedure and trades without obtaining prior approval shall bear full responsibility, including fines that may be determined by the Exchange.

5. Compliance with the Policy and Penalties for Violation

All members of the Board of Directors acknowledge that any violation of this policy shall subject them to the penalties imposed by Misr Al Gadida Company, the Egyptian Exchange, and Egyptian laws, and that any civil or criminal penalties arising from such violation shall be their personal responsibility without any liability on Misr Al Gadida Company. They also undertake to compensate the Company for any loss or damage incurred by it as a result of this violation.