

SEEF PROPERTIES B.S.C.

Key Persons Dealing

Policy and Procedures Manual

DOCUMENT VERSION CONTROL**VERSION HISTORY**

VERSION	APPROVED BY	REVISION DATE	PREPARED/REVIEWED BY	DESCRIPTION
v.1	Audit Committee/ Board of Directors	9 August 2012	Internal Auditor	Initial release
v.2	Board of Directors	11 August 2021	Senior Manager - Legal & Compliance	Update of Manual and addition of internal forms.

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1. DOCUMENT CONTROL

1.1 Introduction

1.1.1 Market manipulation, misleading behaviour or conduct, insider trading and fraudulent or deceptive behaviour or conduct may distort the price discovery system and distort prices and thereby unfairly disadvantage the investors. Accordingly, the laws¹ and regulations² in the Kingdom of Bahrain criminalise the offence of market manipulation, and dealing in the securities of a listed company while in possession of Inside Information as defined herein is considered illegal.

1.1.2 BHB accordingly requires each issuer to issue, maintain and enforce a key person dealing policy in connection with dealing in shares and other securities of the issuer undertaken by its board of directors, senior management and such other persons as decided by the issuer's board of directors to have access to inside information relating to the issuer from time to time.

1.2 Objective

1.2.1 This Policy and Procedures Manual ("**Manual**") is issued in compliance with the regulatory requirements set out in "Guidelines on Issuers' Key Person Dealing in Securities Accepted for Trading on the Bahrain Stock Exchange (now Bahrain Bourse) issued via circular dated 4 November 2010 ("**BHB Key Persons Guidelines**")", Market Abuse & Manipulation (MAM) Module of Volume 6 of Central Bank of Bahrain ("**CBB**") Rulebook and CBB Law.

1.2.2 This Manual is intended to govern dealings in the shares or other listed securities by the Company's Key Persons, as defined herein, or such other persons as decided by the Board of Directors to have access to Inside Information from time to time. It is further intended to provide such Key Persons with the necessary guidelines to facilitate their understanding, ensure that the bona fide investors and market participants are not inconvenienced in their normal course of business, enable them to take all reasonable precautions and exercise due diligence to avoid their engagement in prohibited market behaviour or conduct

1.3 Scope of Application

1.3.1 This Manual is applicable to:

- a. All Key Persons and such other persons as determined by the Company's Board of Directors;
- b. All securities issued or to be issued in the future by the Company; and
- c. Repurchase of the Company of its own shares and other securities.

1.4 Manual Ownership and Control

1.4.1 The Senior Manager of Legal and Compliance shall be the Manual's owner ("**Manual Owner**") assigned the primary responsibility for maintaining the same. All inquiries and requests for revisions of the Manual should be addressed to him/her.

1.4.2 The Senior Manager of Legal and Compliance Department is the custodian and controller ("**Manual Controller**") of all of the Company's policies and procedures, including this Manual.

¹ Article 100 of Chapter 1 of Part 5 - CBB Law

² Market Abuse & Manipulation (MAM) Module of Volume 6 of CBB Rulebook and BHB "Guidelines on Issuers' Key Person Dealing in Securities Accepted for Trading on the Bahrain Stock Exchange".

1.5 Manual Maintenance

- 1.5.1 This Manual will be maintained as a password protected read-only PDF in a shared folder on the Company's intranet. The Manual Controller, or his/her deputy in his/her absence, is the only person entitled to upload, or instruct the upload, of such Manual on the server.
- 1.5.2 A printed copy of this Manual document should always be in the custody of the Manual Controller.
- 1.5.3 One copy of the Manual should be saved in an editable format (such as Microsoft Word), with a password set by the Manual Controller. The editable Manual's password must only be shared with the Chief Executive Officer and Manager of Internal Audit. A memorandum recording the password must be prepared by the Manual Controller and should be sealed and kept in an accessible safe manner.
- 1.5.3 Printing of the Manual will be allowed for Directors and Senior Management only, with each printed copy to be watermarked as "read-only".

1.6 Manual Revision

- 1.6.1 Requests for revision of this Manual shall be initiated or made through the Manual Owner via submitted a Revision Proposal Form as set out in **Appendix 1** of this Manual.
- 1.6.2 The Manual Controller will consider the proposed revisions and record his/her observations on the said Revision Proposal Form to ensure that the requested amendments are in line with the Company's policies and procedures.
- 1.6.3 Upon confirming that the amendments are in compliance with the Company's policies and procedures, the Manual Controller shall forward the proposed revisions to the Chief Executive Officer for his/her review and recommendations.
- 1.6.4 All proposed revisions approved by the Chief Executive Officer shall be forwarded through the Company Secretary to the Audit Committee for its onward review and recommendation, which shall be submitted to the Board of Directors for its final approval.
- 1.6.5 If the revision is approved by the Board of Directors accordingly, the final Revision Proposal Form will be forwarded by the Company Secretary to the Manual Controller, who shall ensure that the revisions are duly incorporated in the Manual.
- 1.6.6 The Manual Controller shall update the editable format of the Manual and upload the password protected read-only PDF onto the Company's intranet. The Manual Controller shall accordingly notify the relevant users of the final changes implemented in the Manual and the effective date thereof.
- 1.6.7 The Manual Owner will ensure the maintenance of the Revision Control Log as set out in **Appendix 2** of this Manual, which is intended to provide a complete trail of revisions made to the Manual.
- 1.6.8 The Manual Owner will review the Manual once every two (2) years, or as required in the event of a change in laws or regulations. Such review must be documented in the Revision Control Log as set out in **Appendix 2** of this Manual.

1.7 Version Control

- 1.7.1 The version of the Manual in use will be referenced as follows:

Department Abbreviation	Document Abbreviation	Version
LCD	KPD	002

1.8 Manual Circulation

This Manual will be published on the Company's website in compliance with the applicable laws and regulations.

2. DEFINITIONS AND ABBREVIATIONS

In this Manual, terms shall have the following meanings:

"**BHB**" means Bahrain Bourse

"**Board**" means the board of directors of the Company.

"**CBB**" means the Central Bank of Bahrain.

"**Company**" means Seef Properties B.S.C.

"**Connected Persons**" in relation to a Key Person means:

- a. The individual's spouse and his/her son, adopted son, stepson, daughter, adopted daughter, stepdaughter, father, stepfather, mother, stepmother, brother, stepbrother, sister or stepsister, under his/her guardianship or control; or
- b. A firm or company in which the individual or any of the persons mentioned in sub-paragraph (a) has control of not less than 10% of the voting power in the firm or company, whether such control is exercised individually or jointly; Connected Persons in relation to a firm or company means another firm or company in which the first-mentioned firm or company has control of not less than 10% of the voting power in that other firm or company.

"**Dealing**" 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 any agreement for or with a view to acquiring, disposing of, subscribing for, or underwriting securities of the Company. To be clear, dealing includes, without limitation, on-exchange and off-exchange transactions, including subscriptions of securities of the Company as well as transactions relating to securities of a company listed on BHB that are quoted on another exchange.

"**Director(s)**" means a director or directors of the Company.

"**Inside Information**" means information that:

- a. Is precise in nature and relates directly or indirectly to one or more of the securities of the Company;
- b. Has not been made public; and
- c. If made public, is likely to have a significant impact on the price of the securities of the Company or their derivatives.

"**Insider**" means any person who has obtained Inside Information:

- a. By virtue of his/her employment or profession;
- b. Being an officer or shareholder of the issuer of the securities; or
- c. Through illegal means.

“Key Persons” means:

- a. The Company itself;
- b. Directors;
- c. Members of Senior Management, including any person acting in such role from time to time;
- d. The Company’s external auditor(s); or
- e. Such other persons as decided by the Board who has or may have access to the Company’s Inside Information from time to time.

“Manual” means this Key Person Dealing Policy and Procedures Manual.

“Market Information” means any published information about trading or non-trading in certain types of securities, their number, prices, range of price for trading or the identity of those involved or who may be involved, in any capacity, such as trading.

“Persons-in-Charge” means the person appointed by the Audit Committee to monitor the day-to-day matters relating to this Manual. The Person-in-Charge at the Company is the Senior Manager of Legal and Compliance.

“Register of Key Persons” means a register maintained by the issuer which includes basic personal data of Key Persons and information on their holdings and dealings in the issuer, including holdings and dealings of their Connected Persons. The Register of Key Persons is maintained at the issuer’s headquarters and updated by the Person-in-Charge.

“Restricted Period” means the period during which Key Persons and any Connected Persons must refrain from trading and wait until the commencement of the following day’s trading session, or after twenty-four (24) hours from publication of the financial statements in the local newspapers or the release of any material news, whichever is shorter.

“Senior Management” means members of the Company’s senior management, namely, the Chief Executive Officer, Chief Technical Officer, Chief Financial Officer, Company Secretary, Senior Manager of Legal and Compliance, Senior Manager of Property Management, Manager of Internal Audit and any other members designated as such by the Board from time to time.

3. PROHIBITION APPLICABLE TO KEY PERSONS

3.1 Prohibition on Dealing Based on Inside Information

- 3.1.1 Key Persons shall not use Inside Information acquired in the workplace for their own personal or economic benefit.
- 3.1.2 Key Persons shall not purchase, sell, offer to purchase or offer to sell Company stock or other securities during any period that he/she possesses Inside Information.
- 3.1.3 During the period that the Key Person possesses Inside Information, the Key Person must forgo a proposed transaction relating to the Company’s securities, even though he/she may have planned to make the purchase or sale before learning of the Inside Information and even though failure to execute the purchase or sale may result in an economic loss to, or the non-realisation of anticipated profit by the Key Person.
- 3.1.4 During the period that the Key Person possesses Inside Information, he/she must not encourage any person to deal in securities to which such information relates.

3.1.5 Key Persons shall not use Inside Information to violate the rules governing the publishing of Market Information.

3.2 **Prohibition on Disclosure of Inside Information**

3.2.1 Key Persons shall not disclose Inside Information to any person (including Connected Persons, other family or household members, friends or other acquaintances) who are not specifically authorised by the Company to have access to such information or are not required to know in the proper performance of the function of his/her employment, office or profession. No Inside Information should be disclosed to any third parties unless such third parties are bound by express or implied duties of confidentiality.

3.2.2 If the Inside Information is used by the person disclosed to by the Key Person to purchase or sell securities in the Company, the Key Person will be legally responsible for the consequences of the purchase or sale as if he/she was purchasing or selling for his/her own account.

3.2.3 Key Persons shall not make any recommendation or express opinion about Company securities to any other person on the basis of Inside Information, even if the Key Person does not actually disclose such Inside Information to the other person.

3.2.4 The Company has the sole and exclusive right to determine how and when to disclose such Inside Information to the public. In all cases in which a Key Person is not certain that information in his/her possession is Inside Information, the Key Person should exercise caution and treat the information confidentially as if it is Inside Information.

4. RESTRICTIONS APPLICABLE TO KEY PERSONS

4.1 **Restricted Period**

Key Persons and Connected Persons are prohibited from buying, selling or transferring the Company's securities during the Restricted Period to ensure that such trading will not undermine confidence in the securities market³.

4.2 **Exemptions**

4.2.1 The restrictions on trading shall not be applied in cases where:

- a. Buying securities by subscribing or obtaining them directly from the Company or its group;
- b. Receiving securities in consideration of redemption, merger, demerger or as compensation in accordance with a public tender offer, or in another comparable manner;
- c. Receiving shares as dividends (bonus shares), or another form of pay-out from retained earnings;
- d. Receiving securities as compensation for work or other performance or service; or
- e. Receiving securities as inheritance under a will, as a present or as a result of partition of an estate or by means of a similar acquisition.

³ Articles 2.14.1 and 2.14.2 of Market Abuse & Manipulation (MAM) Module of Volume 6 of CBB Rulebook

5. REGISTER OF KEY PERSONS

5.1 Maintenance of Register of Key Person

5.1.1 The Person-in-Charge shall at all times maintain an updated Register of Key Persons containing the following:

- a. Basic personal data of Key Persons and their Connected Persons;
- b. Key Persons and their Connected Persons holdings and interests in the Company; and
- c. Details regarding dealings by Key Persons and their Connected Persons in the Company's securities.

5.1.2 The Register of Key Persons must be maintained by the Company for a minimum period of five (5) years.⁴

5.2 Notification of Appointment as Key Person

5.2.1 The Person-in-Charge shall notify the Key Person of his/her status as a Key Person upon his/her appointment, election, employment and/or promotion via the Notification and Declaration Form as set out in **Appendix 3** of this Manual.

5.2.2 The Key Person shall accordingly fill out and promptly submit to the Person-in-Charge the Key Person and Connected Persons Shareholding Ownership Declaration Form as set out in **Appendix 4** of this Manual. The Key Person shall also complete and submit the aforementioned Form annually no later than fifteen (15) days from the end of the calendar year, or promptly after any change in his/her shareholding or the shareholding of his/her Connected Persons.

5.2.3 The Manual Owner shall provide the Key Person with a copy of this Manual, whether printed or electronic, promptly upon confirmed status. The Company Secretary shall be responsible for providing copies of this Manual to the Directors upon their appointment.

5.3 Notification of Dealing to Person-In-Charge

5.3.1 Provided he/she is not in possession of Inside Information, Key Persons may deal in securities of the Company. 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, therefore, does not necessarily constitute Insider trading.

5.3.2 Key Persons are required to notify the Person-in-Charge via email of details of the Dealing no later than the next working day following the completion of the Dealing. Such details must include nature of transaction, quantity and transaction value (per security and total).

5.3.3 The Person-in-Charge shall immediately file with BHB such notifications by Key Persons by using Form KP2 as set out in **Appendix 8** of this Manual no later than two (2) business days from the date of such change.

5.3.4 BHB reserves the right to disseminate to the public the Dealing information as per the rules and regulations issued by the CBB.

5.4 Verification, Disclosure and Reporting to Regulatory Authorities

5.4.1 The Person-in-Charge shall submit an updated and complete Register of Key Person in Form KP1 as set out in **Appendices 5 to 7** of this Manual to BHB as soon as practicable but no later than ten (10) calendar days after the following:

- a. The start of trading when it is first listed on BHB;

⁴ Article 2.15.1 of Market Abuse & Manipulation (MAM) Module of Volume 6 of CBB Rulebook

- b. The conclusion of its annual general meeting; and
- c. Upon request of BHB.

- 5.4.2 The Person-in-Charge must notify BHB of any changes to its Register of Key Persons within ten (10) days of such change. Form KP1 as set out in **Appendices 5 to 7** of this Manual should be used for initial filings of the Register of Key Persons and Form KP2 as set out in **Appendix 8** should be used for filing changes to the Register of Key Persons.
- 5.4.3 The Person-in-Charge shall issue a confirmation of the Register of Key Persons, including details of all trading that took place during the previous month to BHB no later than ten (10) calendar days from the end of each month.
- 5.4.4 The Company's annual report shall contain a statement on this Manual and details of interests of the Directors in the Company's securities.
- 5.4.5 The Manager of Internal Audit shall verify the Register of Key Persons at least once (1) a year prior to the annual general meeting of the Company.
- 5.4.6 The following shall be reported to the Capital Markets Supervision Directorate at the CBB:
- a. The results of the verification undertaken by the Manager of Internal Audit in 5.4.5 no later than ten (10) days from the date of the annual general meeting;
 - b. Any change in the Key Persons resulting from the change in Directors and/or Senior Management. For the avoidance of doubt, the procedure prescribed in the CBB Disclosure Standards shall be complied with in this respect; and
 - c. Any violation of the BHB Key Persons Guidelines and/or CBB Disclosure Standards immediately.

6. MONITORING

6.1 Audit Committee

6.1.1 The Audit Committee shall have the following authorities:

- a. Review and monitor the implementation of the Manual, including any periodic amendments or changes made to it;
- b. Ensure compliance of the Key Persons with this Manual;
- c. Receive and review semi-annual reports submitted by the Person-in-Charge in respect of any updates or transactions occurring during such period, provided that immediate written notice via email is forwarded by the Person-in-Charge to the Audit Committee of any Key Person trade notification received; and
- d. Review and assess any violations to the Manual requirements and to decide on penalties and disciplinary actions for recommendation to the Board.

6.2 Person-in-Charge

6.2.1 The Person-in-Charge shall have the following authorities:

- a. The delegated responsibility of the Audit Committee for day-to-day monitoring, administration, reporting, record keeping and maintenance of the Register of Key Persons;
- b. Ensure timely reporting and notification to BHB and CBB as required under this Manual; and

- c. Ensure Key Persons are fully aware of their obligations under this Manual and provide guidance in respect thereof.

7. VIOLATIONS AND PENALTIES

7.1 Company Actions

7.1.1 Any violation, misconduct or non-compliance by relevant parties of this Manual will be viewed and considered seriously by the Company and may be subject to the following actions:

- a. Disciplinary actions in accordance with the Company's policies and procedures and the Labour Law in the Kingdom of Bahrain, as applicable;
- b. Recovering of any financial penalties paid by the Company, in addition to any damages suffered in relation thereto;
- c. Recovery of any profit made on the Dealing in question, together with any costs or attorney fees association with such recovery;
- d. Termination of the services of the Key Person; and/or
- e. Any other legal action commensurate with the violation in question, subject to the laws and regulations in the Kingdom of Bahrain.

7.2 Regulatory Actions

The Company actions set out hereinabove shall be without prejudice to any penalties or actions as may be imposed by the CBB, BHB and/or any other competent authority.

8. APPENDICES AND FORMS

8.1 Company Internal Forms

8.1.1 *Appendix 1: Revision Proposal Request Form*

This Form should be completed and submitted in accordance with 1.6.1 above.

8.1.2 *Appendix 2: Revision Control Log*

This Log should be completed and submitted in accordance with 1.6.7 and 1.6.8 above.

8.1.3 *Appendix 3: Key Person Notification and Declaration*

This Form should be completed and submitted in accordance with 5.2.1 above.

8.1.4 *Appendix 4: Key Person and Connected Persons Shareholding Ownership Declaration Form*

This Form should be completed and submitted in accordance with 5.2.3 above.

8.2 BHB Forms

8.2.1 *Appendix 5: KP1 (Part 1) Company's Authorised Representative Information Form*

This Form should be completed and submitted in accordance with 5.4.1 above.

8.2.2 *Appendix 6: KP1 (Part 2) Particulars and Holdings of Key Persons Form*

For the purpose of filling this Form, the details of the holdings of the Key Persons and Connected Persons must be included. This Form should be completed and submitted in accordance with 5.4.1 above.

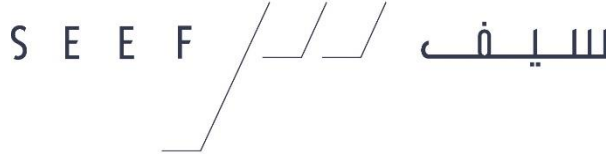
8.2.3 *Appendix 7: KP1 (Part 3) Summary of Particulars and Holdings of Key Persons Form*

This Form should be completed and maintained by the Person-in-Charge and submitted in accordance with 5.4.1 above.

8.2.4 *Appendix 8: KP2 Changes to Particulars and Holdings of Key Persons Form*

This Form should be completed for additions, removals or any changes in the particulars or holdings of the exiting Key Persons and submitted in accordance with 5.3.4 above.

APPENDIX 1
Revision Proposal Request Form



REVISION PROPOSAL REQUEST FORM

DOCUMENT TO BE REVISED	
REQUEST INITIATED BY	
POSITION	

SECTION A: PROPOSED REVISIONS

Please include details of all proposed revisions, citing appropriate sections and page numbers as appropriate. Attach additional sheets if required.

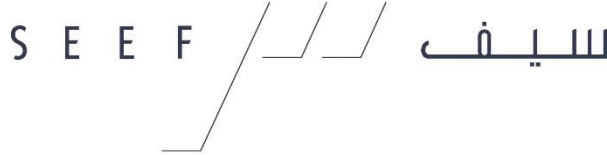
SECTION B: INTERNAL REVIEW AND APPROVALS

Manual Owner Comments	
Manual Controller Comments	
Chief Executive Officer Comments	
Audit Committee Comments	
Board of Directors Comments	

SECTION C: INTERNAL REVIEW AND APPROVAL LOG

RESPONSIBILITY	NAME	SIGNATURE	DATE
Manual Owner			
Manual Controller			
Chief Executive Officer			

APPENDIX 2
Revision Control Log



REVISION CONTROL LOG

DOCUMENT _____

VERSION HISTORY

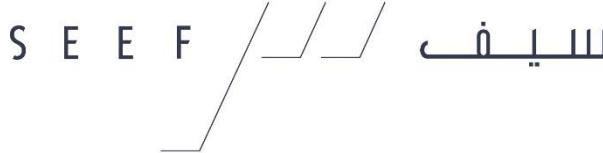
VERSION	APPROVED BY	RELEASE DATE	PREPARED/REVIEWED BY	DESCRIPTION

REVISION HISTORY

VERSION	REVISION DATE	REVIEWED BY	COMMENTS	SIGNATURE

APPENDIX 3

Key Person Notification and Declaration



KEY PERSON NOTIFICATION AND DECLARATION FORM

KEY PERSON NAME	
ID CARD NUMBER	
POSITION	

SECTION A: NOTIFICATION

In accordance with the Key Persons Dealing Policy and Procedures Manual (“Manual”), you are hereby notified that you are now deemed to hold a **KEY PERSON** position at Seef Properties B.S.C. (“Company”). You are accordingly requested to familiarise yourself with the aforementioned Manual, which is available on the Company’s website. If you need any clarifications or guidance in respect of this position or the Manual, please contact the Senior Manager of Legal and Compliance.

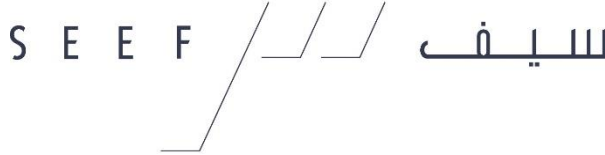
SECTION B: DECLARATION

1. I, the undersigned, hereby confirm acceptance of my notification as a “Key Person”.
2. I confirm that I have read and understood the Manual and shall ensure full compliance with the same.
3. I further consent to the Company processing the personal data provided herein for the purpose of compliance with the relevant laws and regulations, including but not limited to, those of Bahrain Bourse, Central Bank of Bahrain and Ministry of Industry, Commerce and Tourism, and discharging my obligations as a Key Person of the Company.

KEY PERSON SIGNATURE	DATE

APPENDIX 4

Key Person and Connected Persons Shareholding Ownership Declaration Form


FORM TYPE

- New Declaration
 Amendment

KEY PERSON AND CONNECTED PERSONS SHAREHOLDING OWNERSHIP DECLARATION FORM

KEY PERSON NAME
SECTION A: DECLARATION OF OWNERSHIP

Do you, or any of your Connected Persons, hold any shares in the Company?

YES

NO

"Connected Persons" shall have the meaning ascribed to it in the Key Persons Dealing Policy and Procedures Manual.

If you have answered "YES", please fill out Section B below and attach supporting documents such as copy of ID Card(s) and shareholding account statements (if available).

SECTION B: DETAILS OF KEY PERSON AND CONNECTED PERSONS OWNERSHIP

NAME	ID CARD NO./ CR NO.	INVESTOR NO. (IF KNOWN)	NO. OF SHARES

SECTION C: KEY PERSON STATEMENT

- I, the undersigned, hereby declare that all particulars and information given in this Declaration Form (and all documents referred to or provided therewith) are true, correct, complete and up to date in all respects and I have not withheld any information.
- I undertake to advise the Company in writing about any change that may occur to such particulars and/or information immediately in accordance with the Key Persons Dealing Policy and Procedures Manual and via submission of an amendment to this Declaration Form.
- I further consent to the Company processing the personal data provided herein for the purpose of compliance with the relevant laws and regulations, including but not limited to, those of Bahrain Bourse, Central Bank of Bahrain and Ministry of Industry, Commerce and Tourism, and discharging my obligations as a Key Person of the Company.
- I further consent to the Company requesting periodic confirmation from the Company's Share Registrar with regards to the shareholding declared herein.

KEY PERSON SIGNATURE
DATE

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APPENDIX 5

KP1 (Part 1) Company's Authorised Representative Information

Name of Issuer:
Submitted by: Name: Designation: Issuer's Stamp: Signature:
Date of Submission:

APPENDIX 6

KP1 (Part 2) Particulars & Holdings of Key Persons

Particulars				
Name		Designation		ID Number
Nationality		Date of Appointment		Passport Number
Holdings				
Security Type	Number of Securities		Percentage of Holdings (%)	
	Direct	Indirect	Direct	Indirect
Shares				
Options				
Rights				
Warrants				
Others				
Total				

Stamp & Signature: _____
 Company's Authorised Representative

APPENDIX 7

KP1 (Part 3) Summary of Particulars & Holdings of Key Persons Register

Key Person	Designation	Nationality	ID / Passport Number	Person under guardianship / Control of Key Person		Security Type (shares / options / rights / warrants / others)	Total Holdings
				ID / CR	Name		

Stamp & Signature: _____
 Company's Authorised Representative

APPENDIX 8

KP2 Changes to Particulars and Holdings of Key Persons

Particulars						
Name		Designation		ID Number		
Nationality		Date of Appointment		Passport Number		
Changes to Holdings						
Security Type	Number of Securities Held Before Change	Date	Number of Securities Acquired/ Disposed of Off Market	Direct/ Indirect	Number of Securities Held After Change	Percentage of Issued Share Capital (%)
Shares						
Options						
Rights						
Warrants						
Others						
Total						

Stamp & Signature: _____
 Company's Authorised Representative