



Statement of Ethics

Policy

Human Capital

30/10/2025

Table of Contents

1. Introduction	4
1.1. Maintaining the Policy	4
1.2. Distribution of the Policy	4
1.3. Confidentiality of the Policy	4
2. Definition	5
3. Policy	5

1. Introduction

In continued compliance with the Corporate Governance Code, Order No. 19 of 2018 (the “**Corporate Governance Code**”), Bahrain Real Estate Investment (Edamah) B.S.C (c) (the “**Company**”) has approved and implemented this Statement of Ethics Policy (the “**Policy**”).

1.1. Maintaining the Policy

The Human Capital Department shall review the document on an annual basis and shall ensure that it is updated accordingly in line with:

- Strategic direction set by the Board of Directors (BoD).
- Changes in needs and requirements of EDAMAH and approved by CEO; and
- Local laws and regulations.

The approval matrix for any updates/revisions to the policy shall be as follows:

Type of revision	Approval Authority
Addition of new policy	CEO
Amendment to existing policy	CEO
Administrative revisions	HOD

1.2. Distribution of the Policy

The Human Capital Department shall ensure that the updated versions of the policy are distributed to concerned EDAMAH Management and employees, highlighting the sections and chapters within which changes have been made.

Concerned EDAMAH employees shall read and understand the policy and its relevant appendices so as to comply with, and assist peers in complying with, the policy established. Each recipient of the policy shall be responsible for ensuring that they have thoroughly read and understood the amendments made and provide their signature upon receiving the Manual.

1.3. Confidentiality of the Policy

The contents of these policies are to be treated as confidential and are not to be disclosed or distributed to any unauthorized persons or clients, inside or outside EDAMAH. The document must be kept in safe custody and must not be copied or revealed without the prior permission of the Head of Human Capital. Disclosure to third parties may be performed only in specific / exceptional cases where there is a proper justification (e.g. special projects with contracted consultants).

2. Definition

Unethical practice means a situation where a member of the staff:

Commits deliberate acts, practices, undertakes certain activities that result in or have the potential to result in harm to the Company, and/or which puts him/her in a position of advantage/gain as against the Company or neglects the Company's interests due to his/her personal interest.

3. Policy

The Company's being fully confident of the loyalty and sense of integrity of each of the employee, advises that in the interest of good governance, such practices which are in conflict with the Company's interest shall not be practiced by any employee, which are more specifically mentioned hereunder:

- a. Using office work materials and the Company's staff and facilities such as machines, equipment and communication media in pursuit of personal business.
- b. Using official capacity in achieving a financial/other gain or interest outside the Company which could not be achieved otherwise.
- c. Disclosing data or decisions or negotiations being made in the process of taking decisions, to anyone for use in achieving self-interest inside or outside the Company, whether this act has been done with or without payment (in cash or in kind).
- d. Being a partner in existing/potential business and using his/her influence or authority in the Company to further the interest of such business or indeed the business of personal/professional associates.