

## Group Policy

# Insider Trading Policy

### Integrity in Information, Trust & Trading

The Industrialization and Energy Services Company (TAQA) is committed to maintaining integrity, fairness, and compliance with all applicable laws in its business operations. This policy establishes the principles and responsibilities for preventing insider trading and ensuring that all relevant stakeholders handle Material Nonpublic Information (MNPI) responsibly and ethically.

Material Non-Public Information (MNPI) refers to confidential information that has not been made public and could influence an investor's decision to buy or sell securities. Insider trading based on MNPI or sharing it with others who may trade on it, is illegal in most jurisdictions and considered a violation of insider trading laws.

This policy is approved by TAQA's Board of Directors following the recommendation of the Audit Committee. It applies globally to all TAQA stakeholders (including directors, employees, interns, trainees, other full-time stakeholders and third parties) engaged in a TAQA Group & Corporate function and the Well Solutions, Product & Technology, Geothermal & Argas Business Units.

#### Under this policy, the following shall apply:

- ▶ TAQA enforces a zero-tolerance approach to insider trading and the misuse of MNPI.
- ▶ Employees must not buy, sell, or trade securities based on MNPI obtained through their role at TAQA.
- ▶ Employees must not disclose MNPI to unauthorized individuals, including family and third parties.
- ▶ Employees must comply with blackout periods and restrictions, as communicated by the company.
- ▶ Potential or actual violations must be reported through designated whistleblower channels.

While these principles define our collective commitments across the Group, if local laws in specific jurisdictions impose stricter requirements than those stated in this document, the more stringent local laws must take precedence and be followed.

Failure to comply with this policy, including the misuse of MNPI or engaging in insider trading, will result in disciplinary action and may lead to legal consequences.

This policy is under the ownership of the Governance, Risk, and Compliance (GRC) department, which is responsible for ensuring its implementation, maintenance, and periodic review to align with regulatory and organizational requirements.



**ADEL AL-GHADHBAN**

**Interim Chief Executive Officer**

Industrialization and Energy Services Company (TAQA)

