



# **Aamal Company Q.P.S.C.**

## **Disclosure Policy**

---

<b>1</b>	<b>INTRODUCTION</b> .....	<b>3</b>
<b>2</b>	<b>ROLES AND RESPONSIBILITIES</b> .....	<b>4</b>
<b>3</b>	<b>DISCLOSURE OF MATERIAL INFORMATION</b> .....	<b>4</b>
<b>4</b>	<b>DISCLOSURE OF QUARTERLY EARNINGS INFORMATION</b> .....	<b>5</b>
<b>5</b>	<b>DISCLOSURE OF ANNUAL FINANCIAL STATEMENT</b> .....	<b>5</b>
<b>6</b>	<b>INVESTOR RELATIONS</b> .....	<b>6</b>
<b>7</b>	<b>RESPONDING TO RUMORS</b> .....	<b>6</b>
<b>8</b>	<b>CONFIDENTIAL INFORMATION</b> .....	<b>7</b>
<b>9</b>	<b>AMENDMENTS</b> .....	<b>7</b>
	<b>APPENDIX 1: RESPONSIBILITY MATRIX</b> .....	<b>8</b>
	<b>APPENDIX 2: DISCLOSURE REQUIREMENTS</b> .....	<b>9</b>

## 1 INTRODUCTION

### 1.1 Introduction

- 1.1.1 The Disclosure Policy (the '**policy**') of Aamal Company Q.P.S.C. ('**Aamal**' or the '**company**') has been established to ensure that all necessary information related to business activities is passed on to the stakeholders in an appropriate, timely and consistent manner through an appropriate channel. It is imperative that communications from Aamal are consistent at all times and that selective disclosure is avoided.
- 1.1.2 Aamal has an obligation to ensure that all information disclosed with the public and authorities is accurate, clear and credible, and in compliance with the requirements of regulatory agencies, including the Qatar Stock Exchange (**QSE**), Qatar Financial Markets Authority ('**QFMA**' or the '**authority**') and other concerned regulatory bodies.
- 1.1.3 This policy assists the board, executive management and relevant departments to understand their roles and responsibilities in the disclosure process.
- 1.1.4 The company's Disclosure Policy provides the approach adopted toward managing and controlling the process of disclosure of financial and non-financial information, in order to ensure that the information disseminated complies with the applicable laws and financial reporting requirements. This policy does not provide insight into or coverage of the general internal and external communications activities.
- 1.1.5 This policy also includes the disclosure requirements that Aamal needs to disclose through the company's website and different reports, subject to the scope and exclusions, as stated above.

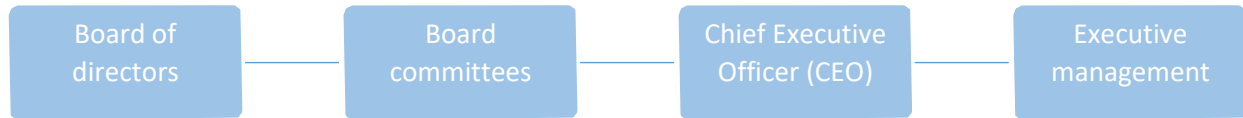
### 1.2 Complementary to law and articles

- 1.2.1 The Disclosure Policy is drafted to comply with the provisions of the company's Articles of Association and Memorandum of Association (together, the '**Articles of Association**' or '**AoA**'), the provisions of the Governance Code for Companies and Legal Entities Listed in the Main Market No. (5) of 2025 (the '**code**') issued by the Qatar Financial Markets Authority ('**QFMA**' or the '**authority**'), and the Commercial Companies Law No. (11) of 2015 and its amendment No.(8) of 2021 (the '**companies law**').

### 1.3 Policy online

- 1.3.1 This policy is posted on the company's website.

## 2 ROLES AND RESPONSIBILITIES



### 2.1 Board of directors

2.1.1 The board of directors is ultimately responsible for setting out this policy and for its implementation.

### 2.2 Audit Committee

2.2.1 The Audit Committee's role is to assist the board in fulfilling its oversight responsibility relating to the integrity of the company's financial statements and financial reporting process. The Audit Committee Charter describes the responsibilities and duties toward achieving its mission.

### 2.3 Legal department

2.3.1 The Legal department of the company will be responsible for reviewing the company's legal issues. The Legal department, along with the communications manager and the Investor Relations team, are responsible for reviewing the policy and recommending any changes to the board. The Legal department will ensure that sufficient controls and systems have been established for preparing quantitative and qualitative disclosures. The Legal department shall decide which disclosures are relevant, based on materiality. Information will be regarded as 'material' if its omission or misstatement could change or influence the assessment or decision of a user relying on that information for the purpose of making economic decisions. The Disclosure Policy breaches reported to the Legal department will be dealt with, in accordance with the department's policies and procedures.

### 2.4 Corporate Communications and Marketing department

2.4.1 The Corporate Communications and Marketing department shall organize the timely publication of financial results and other relevant news in the local newspapers and on the company's website. The joint efforts include the annual production and distribution of the annual reports of the company.

### 2.5 Finance department

2.5.1 The responsibility for ensuring timely and accurate disclosures will lie with the departments mentioned in the Appendix of this document. The Finance department will coordinate the financial statements disclosures. All personnel responsible for disclosures will send the disclosures (after validation by the respective heads of department) to the coordinating person within sufficient time of the deadline for making disclosures. Such internal timelines for completion of disclosures, validation and sending to the coordinating person will be determined by the Corporate Communications and Marketing department.

## 3 DISCLOSURE OF MATERIAL INFORMATION

### **3.1 General guidelines**

- 3.1.1 Aamal recognizes that it must meet the disclosure expectations of its stakeholders and the disclosure obligations prescribed by QSE and QFMA. In the normal course of business, Aamal will make available, all financial information as required by QSE and QFMA including, but not limited to, quarterly, half-yearly and annual financial statements, annual reports and business news releases. Financial information is posted on the investor relations page of Aamal's website.
- 3.1.2 If Aamal chooses to disclose a material fact, it will be broadly disclosed. Until such time as public disclosure is complete, in order to prevent selective disclosure, material facts will be considered confidential material information.
- 3.1.3 It is difficult to provide a complete definition of what constitutes 'material information'. However, information is considered material if its disclosure is likely to have an impact on the price of a security, or include significant changes that potentially impact the perceived or real value of Aamal, such as purchases or modification of major assets and future plans for service development, announcements of earnings or losses, an actual change in earnings or in forecasted earnings that is higher or lower than the forecast, a pending or prospective merger, acquisition or tender offer, the sale of significant assets, or a significant subsidiary, major changes in senior management, significant developments in actual or threatened litigation, and new equity or debt offerings.
- 3.1.4 Both favorable and unfavorable information can be material, as well as information that forecasts whether an event may or may not occur.
- 3.1.5 Material changes of Aamal will be broadly disclosed by way of a news release. Unfavorable news will be disclosed just as promptly and completely as favorable news. The news release will contain enough detail to enable the media and investors to understand the substance and importance of the change being disclosed.

## **4 DISCLOSURE OF QUARTERLY EARNINGS INFORMATION**

- 4.1 Aamal strictly abide by the requirements of Article (48) of the Listing Rules issued by QFMA related to periodic disclosure for the issuer in particular paragraph (d) of the same Article, which states that the issuer "must prepare and publish the quarter reports within a period not exceeding 30 days from the end of the quarter".
- 4.2 Aamal also abides with the requirements of Article (50) of the launch and the inclusion of securities, where the issuer has to publish quarterly reports in two local daily newspapers, at least one of them in Arabic.
- 4.3 Quarterly press releases containing a discussion of the Aamal's earnings results shall be submitted to the QSE, QFMA and the appropriate media channels for dissemination to the public after the board of director's approval of the financial results at the same time. All such press releases shall be reviewed by the Investor Relations (IR) team and approved by the chairman and the CEO.

## **5 DISCLOSURE OF ANNUAL FINANCIAL STATEMENT**

- 5.1 Aamal strictly adheres to the requirement of sixth in Article (11) of the Listing Rules issued by QFMA related to periodic disclosure of the issuer, *"The company must comply with disclosure requirements, including the financial reports, the number of shares owned by each of the chairman and the board members, senior executive management, and major shareholders or controlling shareholders. The company must also comply with disclosure about information related to the chairman, members, and committees of the board as well as their scientific and practical experiences as in the Curriculum Vitae, and whether one of them is a board member, senior executive management of another company or a member of any of their board committees."*

- 5.2 The annual report shall include a comprehensive analysis of performance and financial position compared with the previous year, and projections for the next year. The report shall also include the expectation of the board of director's regarding the ability of Aamal to continue its activity and fulfill its obligations, the number of shares owned by each of the chairman and the board members, senior executive management and major stakeholders or controlling shareholders. In addition, the information about the chairman, the board members and committees shall be disclosed in this report and whether they are board members, senior executive management or Board Committee members in any other company. This publication shall be provided to the QSE and QFMA, with a copy of the report within a period not exceeding 90 days from the end of Aamal's fiscal year.
- 5.3 A year-end financial press release, containing a discussion of Aamal's earnings results, shall be submitted to the QSE, QFMA and the appropriate media channels for dissemination to the public after the board's approval of the financial results at the same time. This press release shall be reviewed by the IR team and chief finance officer (CFO) and approved by the chairman and the CEO.
- 5.4 Disclosure requirements are included under **Appendix 2**.

## **6 DISCLOSURE OF MAJOR SHAREHOLDERS**

- 6.1 Aamal strictly complies with the requirement of Article (25) of the Listing Rules issued by QFMA related to the disclosure of major shareholders representing 5% or more of the company's shares whether owned by a person or a legal entity, *"The company must comply with disclosure requirements, including the financial reports, the number of shares owned by each of the chairman and the board members, senior executive management, and major shareholders or controlling shareholders. The company must also comply with disclosure about information related to the chairman, members, and committees of the board as well as their scientific and practical experiences as in the Curriculum Vitae, and whether one of them is a board member, senior executive management of another company or a member of any of their board committees."*
- 6.2 Aamal company discloses the list of its major shareholders information in its Corporate Governance Report (CG) annually.

## **7 INVESTOR RELATIONS**

- 7.1 The IR team are the main point of contact for investor relations matters.
- 7.2 The IR team also acts as the first point of contact for any information related to shareholders, regulators, investment community, the QSE and the QFMA.
- 7.3 The IR team ensures timely reporting of financial information and corporate price sensitive information to the QFMA and QSE.
- 7.4 All IR communications must comply with QFMA and QSE legislation. Prior to external release of IR communications materials, the Corporate Communications manager will ensure that approvals (chairman/CEO/CFO, as applicable) have been obtained.
- 7.5 Disclosure requirements relating to IR are included under **Appendix 2**.

## **8 RESPONDING TO RUMORS**

- 8.1 Under Article 25 of the QFMA code, *“the company must determine its policy on dealing with rumors by denying or proving, and on how to disclose clearly in writing without inconsistency with the Authority’s relevant legislations. The board must ensure the accuracy and truth of the company’s disclosure and its compliance with all disclosure rules.”*
- 8.2 In general, no comment will be made in response to rumors or speculation regarding Aamal. However, certain exceptions may be made under the direction of the chairman of the board, the CEO and executive management team.

## **9 CONFIDENTIAL INFORMATION**

- 9.1 Matters of a confidential nature are subject to strict confidentiality restrictions and care is taken to ensure the information is used only as permitted. Access to confidential information is restricted to authorized persons who should be aware of their confidentiality obligations and who have signed confidentiality agreements on behalf of Aamal. Lapses, if any, on this aspect by any employee, and repercussions, if any, will be appropriately managed by the executive management team.

## **10 AMENDMENTS**

- 10.1 This policy shall be reviewed on a regular basis, or at least every 3 years.

## APPENDIX 1: RESPONSIBILITY MATRIX

No.	Description of information	Responsibility
1	<ul style="list-style-type: none"> <li>▪ Manage and coordinate media relations activities.</li> <li>▪ Prepare content of the Annual Report and send it to the IR/PR financial).</li> <li>▪ Ensure that approvals (chairman/CEO/CFO, as applicable), have been obtained prior to any external release of IR communications materials.</li> <li>▪ Ensure the timely publication of financial statements and other relevant news.</li> </ul>	Corporate Communications department
2	<ul style="list-style-type: none"> <li>▪ Act as the first-point-of-contact for any information related to shareholders, regulators, investment community or the QSE.</li> <li>▪ Ensure timely reporting of financial information and corporate price sensitive information to the QFMA and QSE.</li> </ul>	IR
3	<ul style="list-style-type: none"> <li>▪ Review and approve press releases.</li> </ul>	Chairman and CEO
4	<ul style="list-style-type: none"> <li>▪ Notes to the financial statements.</li> </ul>	Respective departments to provide to Finance department
5	<ul style="list-style-type: none"> <li>▪ Financial statements.</li> </ul>	Finance department
6	<ul style="list-style-type: none"> <li>▪ Assist the board in the financial reporting process by ensuring the accuracy and integrity of financial statements.</li> </ul>	Audit Committee
7	<ul style="list-style-type: none"> <li>▪ Retain corporate information (board of directors report, shareholders information etc.).</li> </ul>	Board secretary
8	<ul style="list-style-type: none"> <li>▪ Review company's compliance with legal and regulatory issues.</li> </ul>	IR and Legal department or Risk Management and Compliance departments
9	<ul style="list-style-type: none"> <li>▪ CEO's statement and management review.</li> </ul>	Divisional managers
11	<ul style="list-style-type: none"> <li>▪ Risk management information.</li> </ul>	Risk Management and Compliance departments
12	<ul style="list-style-type: none"> <li>▪ Review and update the policy.</li> </ul>	IR and Corporate Communication manager and Legal departments

The stated information in the table above should be directed to the board chairman who is responsible for the implementation of the Disclosure Policy.

## **APPENDIX 2: DISCLOSURE REQUIREMENTS**

Aamal shall disclose information not limited to the following:

### **Website**

- Details and experience of board and Board Committee members
- Board Charter
- Board Sub-committee Charters
- Related Party (transactions) Policy
- Annual Report
- Articles of Association
- IR information (name and position, office phone number, email address, picture)
- Sustainability Report (ESG Dashboard).

### **Annual Report**

- Related party transactions
- Disclosure of shareholdings of board members.
- Pattern of shareholding
- Capital structure
- Board's evaluation of the committees and their achievements
- Any corporate social responsibilities (CSR) activities.

### **General Assembly**

- Annual Report
- Board Remuneration Policy
- External Audit Report
- Corporate Governance Report
- Dividend distribution.

### **Corporate Governance Report as per the QFMA CG code**

- All disclosure requirements, including financial reporting.
- Disclosure of shareholdings of board members, executive management and major or controlling shareholders.
- Disclosure of the procedures followed by the company in implementing the provisions of the code.
- Disclosure of any violations committed during the year, including violations and sanctions imposed due to non-compliance, with implementation of any of principles or provisions of this code, their reasons, the remedial measures taken and measures to avoid these in the future.
- Disclosure of information relating to board members and committees, senior executive management in the company, their scientific, practical experiences and their curricula vitae, their responsibilities, powers and activities during the year, as well as their remunerations and whether any are board members, senior executive management of another company, or a member of any of their Board Committees.
- Disclosure of the procedures of risk management and internal control of the company including the supervision of the financial affairs, investments, and any relevant information.
- Disclosure of the committees' works, including number of meetings and their recommendations.

- Disclosure of the procedures followed by the company in determining, evaluating and managing risks, a comparative analysis of the company's risk factors and discussion of the systems in place to confront drastic or unexpected market changes.
- Disclosure of the performance assessment of the board, compliance of its members in achieving the company's interest, doing the committee's works, and their attending of the board and committees. Disclosure of the performance assessment of the senior executive management in implementing the internal controls system and risk management including identification of number of appeals, complaints, proposals, notifications and the way used by the board to handle the regulatory issues.
- Disclosure of the internal controls failures, wholly or partly, or weaknesses in its implementation, contingencies that have affected or may affect the company's financial performance, and the procedures followed by the company in addressing internal controls failures.
- Disclosure of the company's compliance with applicable market listing and disclosure rules and requirements.
- Disclosure of any conflict or dispute in which the company is a party including arbitration and lawsuits.
- Disclosure of operations and transactions entered into by the company with any 'related party'.

Aamal should observe additional disclosure requirements in its Annual Report and audited accounts, as per prevailing requirements of the stock exchange, accounting standards and/or better practices.