

Policy on Inside Information**1. What is Inside Information?**

Employees usually have 'non-public' information about Ramat or about a company with which Ramat does business. Such information is termed 'inside information'. Inside information includes, but is not limited to, 'unpublished price sensitive information'.

Such inside information may include information about:

- new products or processes;
- mergers, acquisitions or dispositions of businesses or securities;
- problems being faced by the company;
- sales;
- profitability;
- negotiations relating to significant contracts or
- business relationships with others;
- significant litigation; or
- other financial, technical, commercial, legal information;
- pricing policies;
- Customer negotiation details;
- Business policies;
- Operational discussions and decisions;
- Viewpoints of individual manager that may surface in a discussion;

2. What is "unpublished price sensitive" information?

Please refer to The Policy on Insider Trading for details.

3. What are the general principles of the Company policy about Inside Information?

It is important to understand that any Ramat employee may hold inside information and be subject to the restrictions contained in this policy.

Employees should not give or release, without proper authority, to anyone not employed by the company, or to another employee who has no need or does not have the appropriate authority to receive inside information.

Careful control of and restriction of access to sensitive inside information can significantly inhibit improper use of such information.

Employees should not use inside information obtained while in company employment (including information about customers, suppliers or competitors) for the direct or indirect personal gain of the employee or anyone else.

This includes, but is not limited to, taking advantage of such information by:

- Trading or providing information for others to trade in securities or
- Acquiring an interest of any kind of property, including but not limited to plant or office sites or adjacent properties or
- Advising or assisting or informing a customer, contractor, supplier, consultant, advisor, agents, intermediary, contractor, broker, and representative of the company in a manner which leads to direct or indirect personal gain of the employee or anyone else.



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Data transmitted or stored electronically are the assets of the Company requiring protection. Each data user throughout the company is responsible for compliance with the standards and related procedures with reference to safe guarding such data.

Employees who handle particularly sensitive inside information, and who may not have the background to understand the legal and corporate implications of the misuse of such information, should periodically discuss with the Ethics Office the implications of this policy.

If during the course of employment in Ramat employees have developed any patent, know how, invention, or process or if they have been entrusted in preparation of any market/other research report, the same is prohibited from being used outside the company.

Employees should also refer to the Insider Trading Policy contained in this policy document to further understand the company's policy on this issue.
Employees found violating the requirements of the Policy on Insider Information would be subject to disciplinary action.



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