

## Investcorp Holdings B.S.C.

### Key Person Dealing Policy Statement

It is a violation of law for any person to deal in securities of Investcorp Holdings B.S.C. ("Investcorp Holdings") or to cause any other person to deal in such securities, while in possession of non-public information relating to Investcorp Holdings which if made public would be likely to have a significant impact on the price of such securities or any derivatives ("inside information"). Dealing in Investcorp Holdings securities while in possession of inside information is referred to as "insider trading".

By definition, Investcorp Holdings is a Key Person as it could have access to inside information at any given time.

In addition, each Director of Investcorp Holdings and certain employees of the Investcorp Group could have access to inside information at any given time.

Therefore, Investcorp Holdings classifies each Director of Investcorp Holdings and each of the following Investcorp Group employees as a Key Person:

- Each member of the Executive Committee and their respective assistants;
- Each member of the Operating Committee;
- Each Managing Director, Principal and Vice President in Finance & Investor Relations;
- Each employee in Financial Controls;
- Each employee in Legal and Compliance;
- Employees in IT who have Super User/administrative access to all databases;
- Each employee in Internal Audit; and
- Each employee in Corporate Communications.

No Key Person and its connected persons may deal in Investcorp securities such person possesses inside information.

No Key Person and its connected persons may use inside information for his or her advantage or for the advantage of any other person.

No Key Person may disclose inside information to any person except on a confidential basis, to:

- a person within Investcorp Group who has a need to know such inside information for the performance of his or her duties;
- a professional adviser of Investcorp Group who has a need to know such information in order to render professional services to Investcorp; or
- any other person who is subject to a legal duty to maintain the confidentiality of such inside information.

As a safeguard against even an inadvertent instance of insider trading, it is the policy of Investcorp Holdings to require each Key Person and its connected persons to obtain the prior written approval of the Investcorp Holdings Restricted Trading Committee for any proposed dealing in Investcorp Holdings securities.

It also is the policy of Investcorp Holdings to maintain and submit to the Bahrain Bourse as and when required, an updated Register of Key Persons.

**Adopted January 19, 2011**  
**Reviewed with no changes September 2, 2020**

Key Persons are directed to the Investcorp Holdings Key Person Dealing and Insider Trading Policies and Procedures Manual on the Investcorp Group intranet for further details.

Investcorp Holdings will report any violation of the Key Person Dealing and Insider Trading Policies and Procedures Manual known to Investcorp Holdings to the relevant authorities.

Any known violation of this Key Persons Dealing and Insider Trading Policies and Procedures Manual will result in disciplinary action that may include termination of employment.