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Bank of Abyssinia

Securities Trading Policy

March 2026

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Part One: Introduction

1.1. Preamble

WHEREAS, Bank of Abyssinia S.C. (hereinafter referred to as "the Bank") is committed to the highest principles of corporate governance, market integrity, and transparency in its operations and in its conduct as a publicly-listed company;

WHEREAS, the directors, officers, employees, and certain external parties (collectively, "Insiders") of the Bank are subject to specific obligations and standards of conduct concerning trading of the Bank's securities, as mandated by the Rulebook of the Ethiopian Securities Exchange ("ESX");

WHEREAS, the Bank recognizes the importance of establishing a clear, robust, and formal policy to govern securities trading by its Insiders to ensure uniform compliance with ESX Listing Rules, to manage potential conflicts of interest, and to uphold investor confidence;

WHEREAS, such a policy must comprehensively address the timing of trades through defined Closed Periods, ensure the prompt and transparent disclosure of Insider transactions, maintain rigorous confidentiality protocols, and systematically manage the list of persons with access to inside information;

WHEREAS, a structured Securities Trading Policy is essential for protecting both the Insiders and the Bank from the legal, regulatory, and reputational risks associated with non-compliance, including the severe consequences of unlawful insider trading;

Now, therefore, this Securities Trading Policy has been developed and formally issued.

1.2. Short Title

This policy may be cited as "Bank of Abyssinia Securities Trading Policy"

1.3. Purpose of the Policy

The primary purpose of this Securities Trading Policy is to establish a clear and robust framework governing the trading of Bank of Abyssinia S.C. securities by its directors, Executive Management, employees, and other designated persons ("Insiders"). This Policy is designed to achieve the following key objectives:

1.3.1. To ensure that the Bank and its Insiders fully comply with all applicable rules, regulations, and disclosure obligations stipulated by the Ethiopian Securities Exchange (ESX) and other relevant regulatory bodies.

1.3.2. To prevent the unlawful and unethical misuse of Material Non-Public Information (Inside Information) by establishing strict protocols that prohibit trading while in possession of such information, especially during designated Closed Periods.

1.3.3. To provide all Insiders with clear guidelines regarding when they are permitted to trade in the Bank's securities, and the associated reporting and pre-clearance requirements.

1.3.4. To protect both the Insiders and the Bank from the severe legal penalties, financial liabilities, and reputational damage that can arise from actual or perceived misconduct in securities trading.

1.3.5. To implement systematic processes for the timely disclosure of Insider transactions to the ESX, the maintenance of accurate Insider lists, and the transparent reporting of compliance in the Bank's public filings.

1.4. Governing rules

This Securities Trading Policy is developed based on the following governing laws, rules, and regulations:

- ✓ The Commercial Code of Ethiopia.
- ✓ The relevant provisions of the Capital Markets Proclamation (or equivalent legislation) of Ethiopia.
- ✓ Directives and guidelines issued by the Ethiopian Capital Market Authority (ECMA), such as Public Offering and Trading of Securities Directive No. 1030/24 and other applicable directives and guidelines of ECMA and NBE.
- ✓ Rulebook of the Ethiopian Securities Exchange (ESX).
- ✓ The Bank of Abyssinia's Code of Conduct and Ethics.

1.5. Scope and Application

1.5.1. Parties Covered

This Policy applies to:

a) all "Insiders" of the Bank, which includes all members of the Board of Directors, members of Executive Management and their direct reports, and all employees

who have access to Inside Information by virtue of their position or duties. It also extends to the Bank's external advisers, auditors, consultants, affiliates of insiders, and any other persons who owe a duty of confidentiality to the Bank.

b) Members of the Board of Directors of the Bank's subsidiaries (if any).

c) Any "Related Person" of the above, defined as:

   i. Spouse, minor children, or any person residing in the same household.

   ii. Any trust, estate, partnership, or other legal entity over which the covered person exercises control.

1.5.2. Transactions Covered

This Policy applies to all transactions in securities of Bank of Abyssinia S.C., including shares, bonds, derivatives, and any other financial instruments which are issued, or to be issued by the Bank.

1.6. Definition of Terms

In this Policy, unless the context requires otherwise:

Associated company: means any entity formed in or out of Ethiopia in which the Bank holds directly or indirectly a beneficial interest of not less than 20% of the entity's issued share capital.

Bank: means "Bank of Abyssinia S.C"

Beat the market: means attempting to gain an unfair advantage by trading securities based on access to material nonpublic information.

Central Bank: means the National Bank of Ethiopia.

Closed Period: means a designated timeframe, as specified under 3.1.2.1 and 3.1.2.2 in this Policy or the ESX Rulebook, during which Directors, Executive Management, employees, and other insiders are expressly prohibited from dealing in the Bank's securities.

Content and Information Creator: means the officer authorized by the Bank to identify, evaluate, classify, and control information that may constitute material or price-sensitive information, and who determines whether any employee or connected person qualifies as an insider.

Designated Persons: refer to a specific class of Insiders who, by virtue of their position, role, or function within Bank of Abyssinia S.C., are deemed to have regular access to Material Non-Public Information (MNPI) concerning the Bank or its financial instruments.

Directors: means "Board of Directors."

Executive Management: means the Chief Executive Officer, Chief Officers, and Deputy Chief Officers.

Insider: means a person in possession of information from an inside source, if that person has it through:

i. being a director, employee, or shareholder of the Bank;
ii. having access to the information by virtue of his or her employment, office, or profession; or
iii. direct or indirect relationship with a person under (i) and/or (ii) herein above.

Interested Person: means any person who has an interest that represents five percent or more in the share capital of the Bank whether directly or indirectly.

Material Information: means information that could be considered important by a reasonable investor in making decision to buy, hold, or sell securities, or if it could reasonably be expected to affect the market price of such securities. Examples include, but not limited to:

i. Change in the Directors of the Bank,
ii. A negative change in earnings forecasts or expectations from previously communicated,
iii. Major changes in management (including death, resignation, dismissal or appointment of key management or personnel)
iv. Change in the Shariah Advisors appointed by the Bank,
v. Declaration of financial results,
vi. Declaration of dividends,
vii. Change in the financial year-end,
viii. Proposed capital raising or restructuring exercise or changes in the capital structure,
ix. Giving or receiving a notice of intention to make a takeover or mergers, acquisitions or tender offers or divestments,
x. Any proposed change in the business model or general character or nature of the business of the Bank,

xi. Major new developments in the Bank's activities including major new products, banking service innovations and expansion plans,

xii. Any change in shareholding by interested persons in accordance with Part 9 of the Capital Market Proclamation,

xiii. Items of unusual or non-recurrent nature,

xiv. Issue of securities by way of a public offer or rights issue or bonus issue, among others,

xv. Any changes in policies, plans or operations of the Bank that are likely to materially affect the prices of the securities of the Bank,

xvi. Disruption of operations due to force majeure events,

xvii. Any proposed alteration of the Memorandum of Association,

xviii. Significant litigation or regulatory actions with a potential material impact,

xix. Disposal of the whole or a substantial part of the Bank's undertaking,

xx. Any other information required under the Public Offering and Trading of Securities Directive or information that is necessary to enable shareholders to appraise the position of the Bank and to avoid the establishment of a false market in the shares of the Bank.

Nonpublic Information: means an information that has not been disclosed broadly to the market through official announcements, press releases, or other public channels, and sufficient time has not passed for market absorption.

Principal Officers: means Directors, Chief Executive Officer, Share Company Secretary, Chief Internal Auditor, Chief Finance Officer, Chief Risk and Compliance Officer.

Securities: means any instrument, in any legal form, that evidences ownership of a share in a financial transaction and that is negotiable pursuant to approval from the Ethiopian Capital Market Authority (the Authority), such as:

- ✓ shares issued or proposed to be issued in the capital of the Bank;
- ✓ bonds, and other instruments that create or acknowledge a debt issued or to be issued by the Bank;
- ✓ any instrument considered by the Authority as a security for the purpose of implementing this Policy.

Subsidiary Company: means any entity which is owned or controlled directly or indirectly by Bank of Abyssinia S.C. being wholly owned or partially owned where the Bank has the power to govern financial and operating policies/decisions of the entity.

Tippee: a person who receives material nonpublic information (MNPI), such as confidential financial data or future strategic decisions, and others from an Insider.

The Authority: Ethiopian Capital Market Authority (ECMA).

The Exchange: Ethiopian Securities Exchange (ESX).

Part Two: Authorities and Responsibilities

It is the responsibility of all directors, Executive Management, and managers at every level to ensure that all employees are fully aware and adhere to the policy statements outlined in this Policy. Accordingly, the specific responsibilities of the various organs of the Bank are detailed below:

2.1 The Board of Directors

The Board of Directors is the ultimate Governance and Oversight Authority which is responsible for the highest level of policy governance and accountability by:

a) Approving the Securities Trading Policy and reviewing and updating it.
b) Overseeing Management's implementation and enforcement of the Policy to ensure its effectiveness.
c) Receiving and reviewing regular reports from the CEO, CRCO, and Chief Internal Auditor on compliance, including any major violations or control failures.
d) Setting the "tone at the top" by strictly adhering to the Policy and demonstrating a commitment to compliance.

2.2 Chief Executive Officer (CEO)

The CEO is the ultimate Executive Authority and responsible for the overall culture of compliance and the effectiveness of the Policy implementation by:

a) Ensuring the Policy is followed throughout the Bank.
b) Demonstrating leadership by personally adhering to the Policy and reinforcing its importance to other members of the executive management and business heads.
c) Ensuring that sufficient resources are allocated to all relevant functions of the Bank to implement the Policy effectively.

2.3 Chief Finance Officer (CFO)

The CFO serves as the Content and Information Originator and is responsible for:

a) Identifying and determining which employees are Insiders based on their access to Material Nonpublic Information (MNPI).

b) Determining the specific dates of all mandatory Closed Periods based on the internal financial reporting calendar and the expected dates of Board approval for financial results,

or as may be determined due to occurrence of any one or more of the events as described under 3.1.2.2 of this Policy.

c) Providing this official calendar of Closed Periods to the Share Company Secretary for communication.

d) Granting or denying the final approval for all pre-clearance requests based on a real-time assessment of the Bank's MNPI.

e) Authorizing the disclosure of material financial information and providing the final, accurate data.

f) Formally notifying the ESX about the commencement and end of all Closed Periods, and communicating same to all Insiders and relevant employees, based on the calendar provided.

g) Facilitating the pre-clearance process by acting as the primary administrative point of contact.

h) Logging all requests and formally communicating the final decision to the employee.

i) Maintaining the official record, corporate calendar of all Closed Periods, and proof of all filings.

j) Initiate revision of this Policy based on the practical gaps observed and as new developments emerge.

2.4 Chief Risk and Compliance Officer (CRCO)

The CRCO serves as the Procedural Designer and Compliance Advisor and is responsible for:

a) Interpreting the Policy and providing guidance on its application.

b) Designing the practical procedures, controls, and forms (e.g., pre-clearance forms, attestations) required to implement the Policy effectively.

c) Recommending updates to the Policy to the CEO and Legal Unit based on operational challenges, monitoring results, or evolving best practices.

d) Validating that the declared Closed Periods are set in accordance with regulatory requirements and internal financial calendars.

e) Monitoring trading activity and investigating any suspected breaches, including trades during a Closed Period.

f) Advising the CFO on the compliance implications of a pre-clearance request.

g) Advising the Board and the CEO on the compliance sufficiency and practical effectiveness of the Policy.

h) Validating that all disclosures to the Exchange are compliant before submission.

2.5 Chief Internal Auditor

The Chief Internal Auditor serves as an Independent Assurance Provider and is responsible for:

a) Providing independent validation that the controls are working as designed.

b) Conducting periodic and independent audits of the entire Securities Trading Policy process, including pre-clearance, insider list maintenance, and Closed Period administration.

c) Assessing the effectiveness of the controls managed by the CFO, CRCO, and Share Company Secretary.

d) Reporting audit findings and recommendations directly to the Board of Directors.

2.6 Share Company Secretary

The Share Company Secretary serves as the Governance & Execution Lead who is responsible for:

a) Administering the formal adoption and distribution of the Policy.

b) Formalizing, maintaining, and updating the official master Insider List based on information provided by the CFO.

c) Coordinating the logistics for Board review and approval of the Policy and its amendments.

2.7 Director of Legal

The Director Legal serves as the Legal Risk Advisor who focuses on the legal sufficiency of the Policy and mitigation of legal risk and is responsible for:

a) Reviewing the Policy to ensure its alignment with all applicable securities laws, regulations, and case law.

b) Advising on the legal implications of potential material information and the legal risks associated with specific trades or pre-clearance decisions.

c) Managing any legal aspects of regulatory inquiries or litigation arising from alleged insider trading.

d) Identifying regulatory changes that necessitate an update to the Policy and advising the Board on the legal implications of such changes.

e) Interpreting complex legal scenarios and providing a legal opinion on how the Policy should be applied.

2.8 Other Chief Officers/ Department Heads

Other Chief Officers/ Department Heads serve as the Management Line Enforcers and are responsible for policy execution within their business units by:

a) Ensuring all team members within their department are aware of, understand, and comply with the Policy.

b) Supporting the CFO in identifying Temporary Insiders within their teams who are working on sensitive projects.

c) Reinforcing the importance of the Policy and directing employee questions to the CRCO or Company Secretary.

d) Themselves being exemplary in adhering to this policy and related directives of regulatory authorities and the Ethiopian Securities Exchange (ESX) rule book.

2.9 Employees of the Bank

a) General Employee Population

i. It is the responsibility of each employee to fully understand the Securities Trading Policy.

ii. All employees should be aware of the Policy's existence and its core prohibition: they must not trade while in possession of Material Non-Public Information (MNPI).

iii. Maintain confidentiality of material nonpublic information.

iv. Refrain from trading, tipping, or recommending securities based on such information.

v. Report suspected violations to their supervisor, the Share Company Secretary, or the Risk and Compliance unit.

b) Employees with Regular Access to MNPI (Designated Insiders)

i. This group comprises employees who, by virtue of their specific roles and responsibilities, have routine access to sensitive, confidential, or price-sensitive

information. Examples include, but are not limited to, staff of Finance and Accounting, Treasury Operations, Legal, Risk and Compliance, Internal Audit, Strategy and Research, Information Technology/Systems Administration, as well as any other individuals or units designated by the Bank.

ii. All employees within these categories are deemed insiders and are therefore bound by the provisions of this Policy and any related insider trading or confidentiality obligations established by the Bank.

Part Three: Securities Trading Policy Statements

3.1 Trading Restrictions

3.1.1 General Prohibition

3.1.1.1 No covered person may disclose inside information to another person, except in the proper performance of their employment, office, or profession.

3.1.1.2 No Insider shall, under any circumstances, buy or sell securities of the Bank while in possession of Material Non-Public Information (Inside Information) concerning the Bank. This prohibition is absolute and applies regardless of whether a trading window is open or closed.

3.1.1.3 In addition to trading while in possession of material nonpublic information, it is also illegal and a violation of the rule of the Exchange to convey such information to another ("tipping") if the Insider knows or has reason to believe that the person will misuse such information by trading in securities or passing such information to others who will trade. This applies regardless of whether the "tippee" is related to the insider or is an entity, such as a trust or a corporation, and regardless of whether the Insider receives any monetary benefit from the tippee.

3.1.1.4 It is important to note that information is not necessarily public merely because it has been discussed in the press, which will sometimes report rumors. Hence, it shall be presumed that, that information is non-public unless it can be pointed to its official release by the Bank in at least one of the following ways:

i. Public filings with securities regulatory authorities;

ii. Issuance of press releases;

iii. Meetings with members of the press and the public; or

iv. Information contained in proxy statements and prospectuses.

v. Posting on Bank's website and other digital channels.

3.1.2 Closed Period

3.1.2.1 A closed period shall be effective from:

i. the end of the financial period in review (biannually and full year); or

ii. fifteen (15) business days prior to the date of any meeting of the board of directors of the Bank proposed to be held to consider any price-sensitive matters or the date of circulation of agenda papers, whichever is earlier; and shall remain in effect until twenty-four (24) hours after the price sensitive information is submitted to the Exchange. The trading window shall thereafter be opened. The price-sensitive matters, in this case, include: annual financial statements, significant changes in forecasts or profit warnings, corporate actions, capital and financing decisions, strategic developments, and matters of governance and control.

3.1.2.2 The Closed Period shall also include any specific period that may be determined from time to time due to the occurrence of anyone or more of the following:

a) The occurrence of an event (which is yet to be made public) the impact of which could affect the price of the Bank's shares;

b) Declaration of dividends (interim and final);

c) Issue of securities by way of public offer or rights or bonus, etc.;

d) Any major expansion plans or winning of bid or execution of new projects e.g. Amalgamation, mergers, takeovers and buy-back;

e) Disposal of the whole or a substantial part of the subsidiary or any undertaking;

f) Any changes in policies, plans or operations of the Bank that are likely to materially affect the prices of the shares of the Bank;

g) Disruption of operations due to natural calamities;

h) Litigation, dispute with a material impact; and

i) Any other price sensitive information which, if disclosed, is likely to materially affect the prices of the securities of the Bank.

3.1.2.3 Insiders shall not engage in any trading activity that could be perceived as an attempt to "beat the market" by trading simultaneously with the official release of material information. No insider of the Bank shall deal in the securities of the Bank during the close period.

3.1.2.4 A Closed Period is effective as defined in Article 3.1.2.1 of this Policy, and the trading window shall only be considered open 24 hours after the corresponding price-sensitive information has been submitted to the ESX.

3.1.2.5 The Bank shall notify The Exchange in advance of the commencement of each closed period.

3.2 Confidentiality

3.2.1 If material information relating to the Bank has not been disclosed to the general public, such information must be kept in strict confidence and should be discussed only with persons who have a "need to know" the information for a legitimate business purpose.

3.2.2 The utmost care and circumspection must be exercised at all times in order to protect the Bank's confidential information.

3.2.3 The following practices should be followed to help prevent the misuse of confidential information, and all employees shall follow same:

a) Avoid discussing confidential information with colleagues in places where employees may be overheard by people who do not have a valid need to know such information, such as on elevators, in restaurants, social gatherings, and on transportations.

b) Take great care when discussing confidential information on speaker phones or on cellular phones in locations where conversations may be overheard.

c) Do not discuss such information with relatives or social acquaintances.

d) Do not give computer IDs and passwords to any other person. Password protect computers and log off when they are not in use.

e) Always put confidential documents away when not in use and, based upon the sensitivity of the material, keep such documents in a locked desk or office.

f) Do not leave documents containing confidential information where they may be seen by persons who do not have a need to know the content of the documents.

g) Beware of the Internet and other external electronic mail carriers which are not secure environments for the transmission of confidential information. If available, use Bank-authorized encryption software to protect confidential electronic communications.

h) Comply with the specific terms of any confidentiality agreements of which employees are aware.

i) Upon termination of employment, one must return to the Bank all physical (including electronic) copies of confidential information as well as all other material embodied in any physical or electronic form that is based on or derived from such information, without retaining any copies.

3.2.4 The confidentiality obligations and trading restrictions of this Policy extend to the Bank's external advisers. All such advisers must be contractually bound, through a confidentiality undertaking, to the terms of this Policy.

3.2.5 The Bank shall ensure that any information shared in confidence with advisers, or counterparties in connection with a transaction or financing is disclosed under strict confidentiality terms.

3.2.6 The Bank shall notify recipients in writing that such information constitutes inside information and that trading in the Bank's securities is prohibited until public disclosure is made.

3.2.7 The Bank shall ensure that no confidentiality agreement shall override its legal obligation to disclose material information under the Listings Rules or the Public Offering and Trading of Securities Directive.

3.2.8 The Bank shall simultaneously release to the market any price-sensitive information that enters the public domain through lawful disclosure to a regulator or third party, unless such premature disclosure could jeopardize legitimate corporate interests or ongoing negotiations.

3.3 Pre-Clearance of Trades and Reporting of All Transactions

3.3.1 Pre-Clearance Requirement

All Insiders must obtain prior written clearance from the Chief Finance Officer (CFO) before executing any transaction in the Bank's securities, even during an open trading window. Such transactions include, but not limited to:

a) Buying or selling Bank securities.

b) Conducting transactions for Related Persons.

3.3.2 Post-Transaction Notification

Following any transaction, the Insider must formally notify the Chief Finance Officer in writing on the very same day the transaction occurred, providing full details of the trade.

3.3.3 Timely Disclosure to The Exchange

The Bank, via the Chief Finance Officer, shall disclose every transaction notified by an Insider to the Ethiopian Securities Exchange (ESX) within one (1) business day of receiving the formal notification.

3.4 Maintenance and Submission of Insider List

To ensure compliance with applicable securities laws and to maintain the integrity of confidential and price-sensitive information, the Bank shall maintain and regularly update its Insider List in accordance with the following principles:

3.4.1 Change in Reason for Access

The Insider List shall be updated without delay whenever there is a change in the reason why an individual has access to Inside Information.

3.4.2 Addition of New Individuals

Whenever a new person obtains access to Inside Information, their details must be added to the Insider List immediately. The record shall include all required information as prescribed by applicable regulations, including the individual's identity, role, and the date and time they gained access to Inside Information.

3.4.3 Removal of Individuals

When any person listed on the Insider List no longer has access to Inside Information, their record shall be promptly updated to indicate the date and time such access ceased.

3.4.4 The Insider List must be submitted to the ESX in the prescribed format no later than thirty (30) days after the end of each calendar quarter.

3.5 Information Disclosure and Compliance

3.5.1 The Bank shall ensure that all material information known to the Bank concerning it, its subsidiaries, or its associated companies is disseminated to the public in a timely manner and in accordance with the disclosure timeline prescribed under the Public Offering and Trading of Securities Directive in accordance with the disclosure and communication policies of the Bank.

3.5.2 The Bank shall ensure that such disclosures are made to prevent the establishment of a false market and to enable investors to make informed decisions regarding the Bank's securities.

3.5.3 The Bank shall ensure that any information required to be disclosed to The Exchange is simultaneously made available to the public through the Exchange's approved filing media, except where the disclosure is specifically made to The Exchange in confidence as permitted by relevant law or regulation.

3.5.4 The Bank shall disclose the names of interested persons and any change in their shareholding in accordance with the procedures and timing specified by the ECMA

3.5.5 The Bank shall immediately announce any of the following matters, through the Exchange's approved filing media/platform as they constitute price-sensitive information under ESX Rulebook:

i. Changes in composition of Board of Directors or key management personnel;
ii. Appointment, resignation, dismissal, or death of key executives or Sharia Adviser (where applicable);
iii. Changes in the financial year-end;
iv. Declaration of financial results or dividends;
v. Significant changes in financial forecasts or expectations;
vi. Capital raising or restructuring exercises;
vii. Takeovers, mergers, acquisitions, divestments, or tender offers;
viii. Major new business developments, contracts, or expansion projects;
ix. Changes in shareholding of interested persons as required under applicable laws;
x. Issuance of new securities (public offer, rights issue, or bonus issue);
xi. Disposal of substantial assets or parts of the undertaking;
xii. Major litigation, regulatory disputes, or force majeure events likely to disrupt operations; and
xiii. Any other information required to avoid the establishment of a false market in the Bank's securities.

3.5.6 The Bank shall seek written approval from The Exchange for any exemption from disclosure where:

i. Disclosure would constitute a breach of law;
ii. The information is confidential and a reasonable person would not expect its disclosure;
iii. The information concerns incomplete proposals, negotiations, or internal management matters; or
iv. The information is considered a trade secret.

3.5.7 The Bank shall not provide material or price-sensitive information to any third party before it has been notified to The Exchange, except as permitted under the confidentiality and exemption provisions.

3.5.8 The Bank shall maintain accurate records of all disclosures made to The Exchange and the public, including supporting documentation, approval memos, and evidence of publication, for regulatory inspection and internal audit purposes.

3.5.9 The Compliance Unit shall periodically review the Bank's disclosure practices to ensure continued compliance with applicable laws and regulations.

3.5.10 Any breaches or delays in disclosure shall be reported promptly to the Board Risk Management and Compliance Committee, and remedial action shall be taken as appropriate.

3.5.11 The Bank shall publicly confirm its adoption of this Policy and report on compliance levels in its interim reports, annual reports, and Corporate Governance Report, as required by the ESX Listing Rules.

3.6 Reporting in Financial and Governance Disclosures

In its interim reports, annual reports, and the Corporate Governance Report, the Bank shall disclose the following, in relation to securities transactions by directors and Principal Officers:

i. A confirmation that the Bank has adopted a securities trading policy with standards not less stringent than those required by the ESX Listing Rules.

ii. A statement on whether the Insiders have complied with the required standards of the ESX Listing Rules and this Policy.

iii. In the event of any non-compliance, full details of the non-compliance and a comprehensive explanation of the remedial actions taken by the Bank to address it.

3.7 Rule of Strict Application

Any uncertainty regarding the application of these policy statements shall be resolved by consulting the Chief Finance Officer before any trade is contemplated or executed. When in doubt, the safest course of action would be to refrain from trading.

3.8 Internal Publicity and Accessibility

3.8.1 The Bank shall communicate this Policy to all Insiders and to all new Insiders upon their appointment or hiring, apart from internal communication channels.

3.8.2 The Policy shall be reiterated on a regular basis through internal communications.

3.8.3 A current version of this Policy shall be maintained and accessible on the Bank's official website.

3.9 Monitoring and Investigation

3.9.1 Compliance with the provisions of this Policy shall be monitored by the Bank's Risk and Compliance Unit. In the event that a potential breach is identified, an appropriate investigation shall be conducted. The Unit may request support or information from any internal department or relevant external organization necessary to obtain data or evidence required to complete the investigation.

3.9.2 For the purpose of such investigations, a Director, Principal Officer, or other designated employee shall authorize the Risk and Compliance Unit to access any securities investment accounts held by the Director, Principal Officer, or employee with the Central Securities Clearing System (CSCS). This includes accounts held in the individual's name or in which the individual has a beneficial interest.

3.10 Reporting

3.10.1 The Risk and Compliance Unit shall provide quarterly reports on the monitoring of compliance with this Policy as part of the Compliance Status Report submitted to the Management Team and the relevant Board Committee.

3.10.2 Reporting to Regulators or other mandated parties may be governed by the relevant Directives of ECMA, the ESX, and the Central Bank.

3.10.3 Instances involving special investigations or significant compliance breaches shall be reported separately to Management and the appropriate Board Committee for further review and action.

3.11 Violations and Enforcement

3.11.1 Any violation of this Securities Trading Policy constitutes a serious breach of fiduciary and legal duties. The Bank shall impose appropriate disciplinary measures for any such breach, which may include termination of employment.

3.11.2 In addition, in accordance with the relevant provisions of the Capital Market Proclamation, NBE, ECMA and ESX directives, and any subsequent amendments thereto, individuals engaged in insider trading may be subject to criminal prosecution.

Part Four: Miscellaneous

4.1 Amendment and Review

This Policy shall be reviewed and updated every three years. However, it may be amended any time as deemed necessary.

4.2 Deviations and exceptions

Any exceptions and deviations to this policy shall be approved by the Board of Directors of the Bank.

4.3 Approval and Effective Date

This Securities Trading Policy has been approved by the Board of Directors of Bank of Abyssinia. It shall enter into force as of March 26, 2026, and remain in effect until it is replaced or amended by a duly approved revision.

Board of Directors

1. Ato Mekonnen Manyazewal
2. Ato Aemero Belete
3. W/ro Emebet Woldeher
4. Ato Kassahun Zewdie
5. Ato Meseret Melese
6. Ato Molalign Melese
7. Ato Solomon Alula
8. Ato Yerom Gessesse
9. Dr. Yihenew Zewdie

Annexure

Annex 1: Prior Clearance Request Form

A. Insider Details

1. Name: _____
2. Position/ Designation - [Director/ Executive Management/ Employee, auditor, consultant]: _____
3. Department/Unit: _____

B. Transaction Proposed

1. Type of transaction – [Buy / Sell / Transfer / Exercise of Option]: _____
2. Security description – [Ordinary shares / Preference shares / Options / Bond / Others (specify)]: _____
3. Quantity /number of securities: _____
4. Proposed date of transaction: _____
5. Broker/trading member: _____

C. Declaration

I hereby declare

- I confirm that I am not in possession of any material unpublished information relating to the Bank.
- I undertake to execute the transaction only upon receipt of written clearance and within the validity specified.
- I acknowledge that the completion of the transaction remains subject to all applicable laws, regulations, and internal policies, even if clearance is granted.

D. Clearance Request

I kindly request to grant me prior written clearance to proceed with the above transaction.

Signature: _____

Name: _____

Date: _____

E. For Official Use Only (to be completed by CFO)

Clearance granted / denied [☐Yes / ☐No]

Reasons (if denied): _____

Validity period of clearance: From _____ to _____

Signature: _____

Date: _____

Annex II: Post-Transaction Notification Form

A. Insider Details

1. Name: _____
2. Position/ Designation - Director ☐ Executive Management ☐ Employee ☐ Auditor ☐ Consultant ☐

   Other (please specify): _____
3. Department/Unit: _____

B. Prior Clearance Reference

1. Date Clearance Granted: _____
2. Validity Period of Clearance: _____

C. Transaction Executed

1. Nature of transaction – [Buy / Sell / Transfer / Exercise of Option]: _____
2. Security Type – [Ordinary shares / Preference shares / Options / Bonds / Others (specify)]: _____
3. Number of securities transacted: _____
4. Date of transaction: _____
5. Trading venue/broker: _____

D. Declaration by Insider

1. I confirm that the transaction described above matches the prior clearance granted.
2. I confirm that no material unpublished information was possessed at the time of transaction execution.
3. I confirm that this notification is true, complete, and accurate.

Signature: _____

Name: _____

Date: _____

E. Company Secretary confirmation

I confirm receipt of post-transaction notification consistent with prior clearance.

Signature: _____

Name: _____

Date: _____