Internal

ALKHABEER CAPITAL

ALKHABEER DIVERSIFIED INCOME TRADED FUND 2030

Voting Policy

Nov 2025

Voting Rights Policy – Alkhabeer Diversified Income Traded Fund 2030

1.0 Introduction:

As per Article 62 of the Investment Fund Regulations, the Capital Markets Authority ("CMA") of the Kingdom of Saudi Arabia has stipulated that the Fund Manager must develop a Voting Rights Policy ("Policy") in relation to the assets held by the Fund and it must be approved by the Board of Directors of the Fund. In addition, any voting rights attributed to the underlying assets of the Fund shall be made in accordance with the Policy.

2.0 Purpose:

The purpose is to provide a clear understanding of the Voting Rights Policy adopted by the Fund Manager in relation to the underlying investments held by Alkhabeer Diversified Income Traded Fund 2030.

3.0 Persons/Departments Affected:

The following entities are affected by this policy:

3.1 Capital Markets Department
3.2 Operations Department
3.3 Compliance Department
3.4 Any external authorized agency that represents the Custodian or sub-Custodian of the Fund
3.5 Fund Board

4.0 The Policy:

Scope of Policy: This Policy will be applicable to Alkhabeer Diversified Income Traded Fund 2030.

Key Definitions:

a) **Voting rights:** Holders of certain securities, most commonly equities, have certain legal rights to vote on important corporate matters of companies. Some examples of these include mergers, dividend distribution, governance matters. Voting rights can be accorded to investors of other securities also, such as those holding funds or debt securities. These are variants of voting rights and differ on a case-to-case basis.

b) **Underlying investments:** These refer to the holdings of Alkhabeer Diversified Income Traded Fund, which are a mix of debt securities, fund investments and securities such as certificates (of debt investments done by external investment managers to whom the Fund has allocated capital).

c) **Corporate Actions**: These represent decisions which are taken by the company that affect the holders of its securities. These are generally applicable to equity shareholders, but can sometimes apply to debt holders also.

d) **Fund Board:** Constituted for the supervision of AlKhabeer Diversified Income Traded Fund, in accordance with Article 39 of the Investment Funds Regulations.

This Policy will also supersede any pre-existing policies and will be in effect from the date of approval by the Fund Board mentioned below.

4.1 Based on Article 62 of the Investment Fund Regulations, the Fund Manager has the right but not the obligation to exercise voting rights associated with the investments held by the Fund.

4.2 Given that the Fund is not envisaged to hold any equity positions in line with its mandate, voting rights would generally be required only in the case of any unitholder meeting called by any underlying funds which are held as investments, or in the case of any restructuring/default of debt instruments. If applicable and obligatory, the Fund Manager will participate in the voting process. In all other cases, the Fund Manager reserves the right to participate but is not obligated to participate.

4.3 The Fund Manager does not have the intention to participate directly or indirectly in the management of the underlying investments (through SPVs or other legal structures) held by the Fund. Therefore, the Fund Manager does not intend to exercise any voting rights in general, except at the discretion of the Fund Manager and when deemed in the best interest of the Fund's unitholders.

4.4 If deemed in the best interests of the Fund's unitholders, the Fund Manager may at his discretion, exercise its voting rights attached to the Fund's underlying assets on major corporate actions after consultation with the Compliance Officer. In this case, the Fund Manager will maintain full records documenting the exercise of voting rights (including the reasons for exercising or not exercising voting rights in a particular way).

4.5 The Fund Manager reserves the right to vote against any resolution that goes against the interests of the unitholders of the Fund. The Fund Manager will only vote in the exclusive interest of the Fund's unitholders, without taking into consideration the interest of its other businesses.

4.6 A Fund's unitholder cannot require the Fund Manager to vote in any particular manner, or to abstain from voting, in any underlying companies held by the Fund.

4.7 In cases of conflict of interest, the Fund Manager will refer the matter to the Fund Board for guidance, reference and monitoring.

4.8 The Fund Manager or its representatives do not necessarily need to be physically present at the site of the company's annual meeting / extra-ordinary general meeting in order to exercise their right to vote and may voice their vote online or by proxy.

4.9 Agreements with an external Fund Custodian shall ensure compliance with item 5.1 below.

5.0 Responsibilities:

The Fund Manager needs to be informed of the upcoming corporate actions wherein voting is required and the below enumerates the responsibilities of the Operations Department and the Fund Manager in this regard.

5.1 Operations Department and Capital Markets Department in their capacities as Fund Operator and Fund Manager, are responsible for maintaining voting records for a period of ten years.

5.2 The Fund Manager after consultation with the Compliance Department is responsible to present any conflicts of interest that may arise between the Fund Manager and the Fund’s unitholders to the Fund Board.

5.3 The Fund Manager has the right to delegate a representative to exercise the voting rights. The representative may be an employee of the Fund Manager’s or an external authorized agency.

5.4 The Fund Manager shall be responsible for recommending amendments related to the Policy to the Fund Board

5.5 The Fund Manager shall provide a summary of all voting actions, if any, to the Fund Board on an annual basis.

5.6 In any event that may lead to violating this Policy, the Fund Manager shall refer the matter to the Compliance Department for guidance, reference and monitoring.

5.7 In case of Policy violation, the Compliance Department in coordination with the Fund Manager shall advise the Fund Board of such violation.

6.0 Approval:

After consulting with the Compliance Department of the Fund Manager, the Policy was approved by the Fund Board of Directors on 26 November 2025.