Code of Conduct

POLICY DOCUMENT - FRA-REGULATED - EFFECTIVE 1 JANUARY 2026

Purpose

Acumen Holding and its subsidiaries are committed to the highest standards of integrity, professionalism, and ethical conduct. This Code sets out the principles and standards of behaviour expected of every director, officer, and employee across the Group.

1. Scope

This Code applies to all personnel of Acumen Holding and each of its FRA-regulated subsidiaries, including asset management, securities brokerage, and advisory.

2. Integrity and Honesty

Act honestly, fairly, and in good faith in all professional dealings, and never mislead clients, counterparties, or regulators.

3. Compliance with Laws

Comply with all applicable laws, regulations, and directives of the Egyptian Financial Regulatory Authority, as well as the firm's internal policies.

4. Client Interests First

Treat clients fairly, provide clear and non-misleading information, and place client interests ahead of the firm's own.

5. Confidentiality

Safeguard confidential and material non-public information, and use it only for legitimate business purposes.

6. Conflicts of Interest

Identify, disclose, and manage conflicts of interest in accordance with the firm's Conflicts of Interest Policy.

7. Market Conduct

Do not engage in insider dealing, market manipulation, or any misuse of information. Uphold the integrity of the markets in which we operate.

8. Anti-Bribery and Corruption

Maintain zero tolerance for bribery, facilitation payments, or the offering or acceptance of any improper advantage.

9. Reporting Concerns

Report suspected breaches promptly through the firm's Whistleblower Policy. Breaches may result in disciplinary action up to and including termination and referral to the authorities.