Confidential Information and Securities Trading Policy

OHI Group Corporate Policy

Document Control	
Security Level	Public
Company	OHI Group
Department	CEO Office
Approved By	CEO
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Contents

1. Purpose

OHI Group is committed to the highest standards of integrity, confidentiality, and ethical business conduct.

During the course of our business, employees and other individuals acting on behalf of OHI Group may have access to confidential or commercially sensitive information relating to OHI Group, our clients, suppliers, business partners, joint venture partners, or other organisations.

This Policy establishes OHI Group's requirements for safeguarding confidential information and prohibits the misuse of such information for personal financial gain or any improper purpose, including the trading of securities where such trading would be unlawful or unethical.

Protecting confidential information is fundamental to maintaining stakeholder trust, preserving our reputation, fulfilling our contractual obligations, and complying with applicable laws and regulations.

2. Scope

This Policy applies to:

- OHI Group and all subsidiaries and controlled entities;
- Members of the Board of Directors;
- Executive Leadership;
- Employees;
- Agency workers and temporary personnel;
- Consultants and contractors;
- Any third party acting on behalf of OHI Group.

3. Policy Statement

Individuals working for or on behalf of OHI Group must never:

- use confidential or non-public information for personal financial gain;
- purchase or sell securities based on confidential information obtained through their work;
- encourage another person to buy or sell securities using confidential information;
- disclose confidential information to anyone who does not have a legitimate business need to know.

These obligations apply regardless of whether the information relates to OHI Group or any other organisation.

4. Confidential Information

Confidential information may include, but is not limited to:

- mergers or acquisitions;
- tender outcomes;
- major contract awards;
- financial performance;
- strategic plans;
- significant project developments;
- litigation;
- regulatory investigations;
- customer or supplier information;
- pricing information;
- commercially sensitive negotiations;
- unpublished business information.

5. Securities Trading

Employees and third parties must not trade in the securities of another company where they possess material non-public information obtained through their work with OHI Group.

Examples include information relating to:

- listed customers;
- listed suppliers;
- listed joint venture partners;
- listed competitors;
- acquisition targets;
- publicly traded companies involved in projects or commercial transactions with OHI Group.

Employees must never recommend or encourage another person to trade using confidential information.

6. Protecting Confidential Information

- Everyone working for OHI Group must:
- protect confidential information at all times;
- only access information required for their role;
- comply with information security requirements;
- avoid discussing confidential matters in public places;
- securely dispose of confidential documents;
- report any suspected unauthorised disclosure immediately.

7. Responsibilities

Employees and Third Parties
Must:

- maintain confidentiality;
- comply with this Policy;
- seek guidance where uncertain;
- report suspected breaches immediately.

Managers
Must ensure their teams understand and comply with this Policy.

Legal & Compliance
Responsible for providing advice on confidentiality obligations, applicable securities laws, investigations, and regulatory developments.

8. Reporting Concerns

Suspected breaches of this Policy should be reported through:

- OHI Group Speak Up Channel;
- Legal & Compliance;
- Line Management.

Reports made in good faith will be handled confidentially.

9. Breaches

Failure to comply with this Policy may result in disciplinary action, including termination of employment or contract.

Where applicable, breaches may also expose individuals to civil or criminal penalties under applicable securities, confidentiality, or other relevant laws.

10. Policy Review

This Policy will be reviewed periodically to ensure it remains aligned with applicable legislation, regulatory expectations, and OHI Group governance requirements.