Sustainability Report
2025

Scaling Sustainable
FUTURES





The Custodian of the Two Holy Mosques

King Salman Bin Abdulaziz Al Saud



His Royal Highness

Mohammed Bin Salman Bin Abdulaziz Al Saud

Crown Prince and Prime Minister

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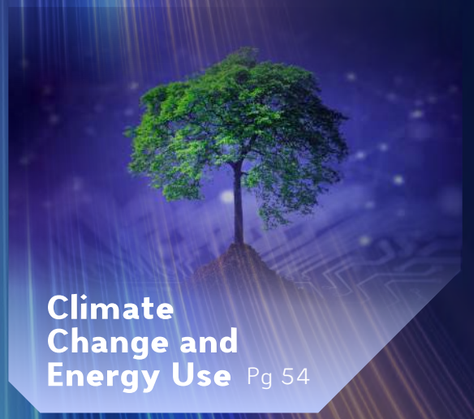
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elm is recognized as one of the region's largest and innovative digital service providers.



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Through its work, elm continues to create sustainable value, advancing community well-being while expanding its impact across local and international markets.

About this Report

GRI 2-2, 2-3

This 2025 Sustainability Report presents elm's environmental, social and governance (ESG) performance and highlights the Company's progress in embedding sustainability across its strategy, operations and decision-making processes.

As a publicly listed digital solutions leader in the Kingdom, elm recognizes that sustainable growth requires structured governance, disciplined capital allocation and responsible innovation. This report reflects how elm integrates sustainability considerations across its operating model, talent development, digital enablement and risk management to support long-term value creation for its stakeholders.

Reporting Period

This report covers elm's sustainability performance for the period 01 January to 31 December 2025, unless otherwise stated. The reporting cycle aligns with elm's annual financial reporting period. Additional information and data from prior years are included as needed for context.

Report Boundary

The report focuses on activities and operations under elm's operational control within the Kingdom of Saudi Arabia, unless otherwise specified.

Where relevant, sustainability data reflects performance across elm's business operations and functions. Any limitations or exclusions related to data scope are clearly indicated in the relevant sections of the report.

Reporting Standards and Frameworks

This report has been prepared with reference to the Global Reporting Initiative (GRI) Standards and the Sustainability Accounting Standards Board (SASB) framework.

The report is also informed by the United Nations Sustainable Development Goals (UN SDGs) and aligned with Saudi Vision 2030 and the Tadawul (Saudi Exchange) ESG Disclosure Guidelines.

GRI

SUSTAINABLE DEVELOPMENT GOALS

تداول السعودية Saudi Exchange

VISION رؤية 2030 المملكة العربية السعودية KINGDOM OF SAUDI ARABIA

SASB STANDARDS

Target Audience

Forward-looking Statements

Feedback



About elm

GRI 2-1, 2-6

Enabling Progress through Digital Intelligence

elm is a strategic enabler of Saudi Arabia's digital transformation, delivering intelligent solutions that enhance public services, strengthen operational efficiency and improve quality of life. For 37 years, the Company has contributed to the development of a modern digital ecosystem, supporting government entities, private sector organizations and individuals in navigating an increasingly connected economy. Through its work, elm continues to create sustainable value, advancing community well-being while expanding its impact across local and international markets.

Established in 1988 as a limited liability company with an initial share capital of ﷼ 500,000, elm expanded its portfolio and capabilities in response to national priorities and evolving customer needs. This growth culminated in its listing on the Saudi Stock Exchange (Tadawul) in 2022 with a fully paid share capital of ﷼ 800 million, represented by 80 million ordinary shares with a nominal value of ﷼ 10 each. Today, the Company is headquartered in Riyadh and trades on Tadawul under the ticker 7203.

elm supports Saudi Vision 2030 through a broad suite of integrated digital services that reinforce economic diversification and national competitiveness (read more on pages 42 - 43). Its work spans sustainable development, smart city enablement, advanced healthcare solutions, secure banking and finance, seamless logistics and next-generation government and business services. Through these interconnected capabilities, elm continues to help build a more secure, efficient and opportunity-rich digital future for the Kingdom and its partners.

Vision

To be the digital enabler for the government and business sectors in the Kingdom and the region.

Mission

Innovate to empower communities and make life easier.

Values

Collaboration

Fostering teamwork and shared efforts to achieve common goals.

Agility and Adaptability

Promoting a proactive and flexible response to change, enabling the organization to swiftly adapt and navigate new challenges and opportunities.

Excellence

The ability to outperform competitors by delivering superior value to customers, emphasizing quality, service or pricing advantages.

Customer-Centric

Prioritizing customer needs and satisfaction to build lasting relationships based on trust and provided value.

Responsibility

Taking responsibility for performing, improving and shaping one's tasks, reflecting a deep commitment to roles and outcomes.

Creativity and Innovation

Encouraging creative thinking and novel solutions to advance progress and competitive advantage, emphasizing the importance of generating new ideas and engaging in creative processes.

Business Activities

elm operates through a comprehensive portfolio that supports the Kingdom's digital transformation and enhances the performance of public and private organizations.

Business Process Outsourcing

elm delivers large-scale operational outsourcing for government and private clients, enabling reliable service delivery through standardized processes and workforce enablement. Its outsourcing covers inspections, business center operations, operational support, and digital enablement - enhancing efficiency and ensuring consistent quality.

Artificial Intelligence

elm provides Arabic large language models (LLMs), agentic artificial intelligence (AI) systems, and autonomous mobility solutions. These technologies help clients accelerate digital transformation, improve operational efficiency and make faster data-driven decisions. elm enables organizations to innovate, optimize and scale effectively.

Consultancy Services

elm provides advisory services that help organizations design and execute strategic and operational improvements. Its consulting scope includes strategy development, digital transformation, operational excellence, leadership development, customer experience and business model design. These services draw on global methodologies to strengthen organizational performance and support informed decision-making.

Digital Business

elm develops and delivers a wide range of digital platforms and solutions that modernize essential services.

Digital Products

The Company provides ready-to-use digital products that are built with government and private sector partners and span security, transportation, healthcare, administrative services, digital identity and financial technologies. These offerings streamline traditional processes and enable efficient electronic transactions.

Digital Solutions

The Company provides end-to-end digital solutions that include applications, business intelligence tools, entitlement engines, managed services, data analytics, AI and specialized platforms. Each solution is designed to meet international standards and help clients improve operational efficiency and strengthen decision-making.

Sustainability Integration in elm 4.0 Strategy

elm's sustainability direction is aligned with its elm 4.0 strategy, which positions the Company as a leading digital enabler supporting digital transformation across government, business and society. Sustainability is embedded in the way elm grows, innovates and delivers digital value. The strategy aims to expand government digital platforms and products, grow its B2B business, and advance technological capabilities, ensuring revenue diversification, resilience and sustainable growth.

The strategy is structured around three primary pillars:

Expanding government products and digital platforms, extending services to additional sectors and integrating solutions across government ecosystems.

Launching and growing new B2B products and platforms, providing innovative solutions and platforms to private sector verticals closely aligned with elm's existing markets and capabilities.

Modernizing and digitizing project capabilities by integrating emerging technologies into elm's solutions and services, creating high-value offerings and driving research and development initiatives.

These pillars are supported by strategic enablers including research and innovation, strategic partnerships and mergers and acquisitions, organizational agility and a culture of innovation designed to strengthen elm's position as a market-shaping digital technology provider and support responsible long-term value creation.



Sustainability considerations influence strategy execution across several dimensions.

Digital enablement and beneficiary experience, by digitizing government services, reducing reliance on paper-based transactions and physical visits to government entities, thereby limiting unnecessary travel and its associated environmental impact, while simplifying procedures, lowering time, cost and friction, and expanding secure and multi-channel access for partners and beneficiaries.

Business sector and digital ecosystem enablement, by developing scalable digital platforms and products that support business growth, expand partnerships, strengthen local content and contribute to economic diversification.

Digital trust and responsible governance, by embedding compliance, cybersecurity, data governance, privacy protection, and the responsible use of AI and emerging technologies across the Company's operations.

National digital talent and capability development, by equipping employees and national talent with the skills required to support emerging technologies, including AI and advanced analytics, and strengthening future readiness.

Operational and environmental efficiency, through automation, cloud-based solutions, digital business models, and the transformation of outsourcing and operational activities into more technology-driven and efficient models, contributing to a reduced physical footprint and more efficient resource use.

Capital allocation toward sustainable growth, by directing disciplined investment toward long-term digital infrastructure, innovation, research and development, partnerships and acquisitions that support business resilience and sustainable growth.

Through this strategy, elm's role extends beyond market expansion to supporting national digital transformation in line with Saudi Vision 2030, while reinforcing long-term operational resilience, economic diversification and sustainable growth.

Geographic Footprint

elm's geographic footprint reflects its strategic approach to expanding reach and creating long-term impact through scalable digital capabilities. Building on its success within the Kingdom, the Company has strengthened its international presence through selected global offices and strategic partnerships across both public and private sectors. By transferring proven expertise into new markets, elm delivers integrated, intelligence-driven solutions that support sustainable growth and operational excellence.

10
International Projects

5
Branches

As the Company continues to expand internationally, it remains focused on resilience, scalability and the consistent delivery of value for stakeholders across every market it serves.

United Kingdom
Morocco
Ivory Coast
Egypt
Jordan
Turkey
Saudi Arabia
United Arab Emirates
Oman
Pakistan
Bangladesh
Malaysia
Indonesia

Leadership and Performance Highlights

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14.9%

Workforce expansion

﷼44.9 million

Investment in research

> In 2025, we continued advancing this commitment by embedding sustainability across our strategy, operations, and culture – strengthening the resilience of our infrastructure.



Message from the Chairman

GRI 2-22

Sustainability is a fundamental driver of elm's long-term value creation and a core consideration in how the Company defines its strategy and operates. As a company at the intersection of digital transformation and national development, our sustainable growth is underpinned by disciplined governance, clear strategic direction, and responsible innovation. By sustaining resilience, enhancing risk management, and boosting stakeholder confidence, our approach enables more agile and effective responses to a dynamic digital and regulatory environment.

elm continues to play a vital role in supporting Saudi Arabia's Vision 2030 through its platforms, services and partnerships. As a national digital enabler, the Company contributes to economic diversification, enhances efficiency and supports the development of a knowledge-based digital economy. Through our digital solutions and strategic collaborations, elm continues to enhance service efficiency and contribute to sustainable development outcomes at scale.

Over the past year, the Board has placed particular emphasis on advancing its oversight and governance practices, deepening enterprise risk management and sustainability integration across the organisation. Our approach goes beyond compliance; it is about embedding accountability and integrity into how we operate. We continue to mature our practices across data privacy, cybersecurity and regulatory compliance, ensuring that our frameworks keep pace with an evolving threat and regulatory landscape. This is driven by a robust internal controls environment and data governance practices designed to safeguard the trust that clients and government partners place in elm as a provider of mission-critical digital services across the Kingdom.

As part of this evolution, the Company has undertaken the reassessment of material ESG topics and begun developing elm's first dedicated Sustainability Strategy, ensuring that sustainability is governed at the highest level and systematically embedded into the Company's long-term planning and decision-making.

As the digital landscape continues to evolve, we remain committed to anticipating emerging trends and adapting our capabilities accordingly. We strengthened elm's digital architecture by advancing innovation and intelligent automation, with a focused integration of artificial intelligence (AI) across our operations and services. Guided by robust governance, we ensure the responsible and ethical use of AI, prioritising transparency and data privacy. This enables more efficient, reliable and seamless experiences for our clients and stakeholders. Through continued service digitisation, we deliver scalable, future-ready solutions that support national priorities and contribute to long-term sustainable development.

Environmental considerations are increasingly embedded into our decision-making, with a focus on enhancing operational efficiency and integrating climate-related scenarios into risk management and business continuity planning. This has been supported by infrastructure upgrades and advanced control systems across our facilities to drive energy optimization, alongside strategic partnerships with leading environmental sustainability organizations to advance waste segregation and recycling practices across our operations.

Our social priorities reflect a clear commitment to the people and communities we serve. As part of our talent development efforts, we continue to invest in developing our workforce through structured learning programmes and initiatives designed to build the capabilities required for an evolving digital economy. Through our customer-focused approach, we remain committed to delivering reliable, high-quality digital services that earn and maintain trust across all touchpoints. Across the communities we serve, we have deepened our partnerships with leading organisations to promote inclusion and youth development, advancing our contribution to a more equitable and opportunity-rich society. In recognition of this structured approach to social responsibility, elm was awarded the 2025 Corporate Social Responsibility Award (Silver Category) by the Ministry of Human Resources and Social Development.

Our commitment to transparency, accountability and sustainable growth is a duty we uphold towards our stakeholders. elm will continue to expand its capabilities, explore new markets and leverage innovation responsibly, while advancing a comprehensive sustainability framework supported by clear objectives in alignment with elm's corporate vision, providing a more focused foundation for measurable, long-term impact.

On behalf of the Board of Directors, I would like to express our sincere appreciation to the Custodian of the Two Holy Mosques, King Salman bin Abdulaziz Al Saud, and to His Royal Highness Prince Mohammed bin Salman bin Abdulaziz Al Saud, Crown Prince and Prime Minister, for their steadfast leadership and unwavering support in advancing the Kingdom's national transformation journey. We also extend our gratitude to our clients and strategic partners for their continued trust in elm and their valued partnership in delivering innovative digital solutions that drive sustainable national development.

Infrastructure upgrades and advanced control systems installed across elm's facilities to drive energy optimization

2025 Corporate Social Responsibility Award (Silver Category) by the Ministry of Human Resources and Social Development.

sustainable development outcomes at scale.

Rayed Abdullah bin Ahmed
Chairman of the Board of Directors



Message from the CEO

GRI 2-22

At elm, sustainability is how we ensure digital transformation remains resilient, trusted, and capable of creating long-term national value. As a partner enabling critical digital services across the Kingdom, we view sustainability not as a standalone agenda, but as a core business capability that strengthens how we innovate, operate, secure and scale our services responsibly.

In 2025, we continued advancing this commitment by embedding sustainability across our strategy, operations and culture – strengthening the resilience of our infrastructure, investing in Saudi talent, and enhancing the governance frameworks that support trusted digital services at scale.

This year, we initiated the development of elm's Sustainability Strategy, laying the foundation for a clear framework aligned with Vision 2030 and the priorities most material to our business, stakeholders and the evolving digital economy. The strategy will reinforce our long-term approach to operational resilience, responsible innovation, and sustainable growth.

As demand for national digital services continues to accelerate, maintaining efficient and intelligent infrastructure remains essential. During 2025, we upgraded our operational environments through advanced energy-efficient technologies, including LED systems, smart HVAC solutions, intelligent lighting controls, and integrated monitoring technologies connected to building management systems and motor control units. These efforts contributed to a 7.7% reduction in electricity consumption and a 12.1% reduction in greenhouse gas emissions intensity – supporting both operational efficiency and environmental performance.

We also strengthened our waste management practices through circular economy principles and strategic partnerships that support responsible recycling and resource optimization.

At the center of elm's growth is our investment in people. In 2025, our workforce expanded by 14.9%, while employee training hours increased by 48.9%, reflecting our commitment to developing Saudi capabilities equipped for rapid technological transformation. Nationalization remains a strategic priority that directly contributes to service quality, operational continuity and customer trust – reflected in a 92% complaint resolution rate and a 93% average customer satisfaction score.

The responsible integration of artificial intelligence also remains central to elm's long-term strategy. We believe AI is a key enabler of more scalable, accessible and impactful digital services that support the Kingdom's ambitions in advanced technologies. In 2025, elm invested ﷼ 44.9 million in research and ﷼ 9.5 million in innovation to strengthen our ability to develop future-ready solutions, accelerate responsible AI adoption, and sustain a culture of continuous learning and innovation.

Maintaining trust across the digital ecosystem requires strong governance and resilient risk management practices. During 2025, elm achieved ISO/IEC 27701 certification, further strengthening our data privacy and information security frameworks, while maintaining zero cybersecurity and data breach incidents – reinforcing the reliability and trust that clients, partners and users place in our services every day.

Looking ahead, we remain focused on building more resilient infrastructure, accelerating responsible AI integration, deepening investment in Saudi talent and advancing sustainable operational practices across our business. As digital transformation continues to evolve across the Kingdom, elm remains committed to delivering secure, efficient and human-centered digital services that create sustainable value for our clients, partners and society.

The progress reflected in this report represents the dedication of our people, the trust of our clients and partners, and the collective ambition that continues to shape elm's journey. I extend my sincere appreciation to our Board of Directors, our partners and every member of elm's team for their contribution to our continued growth and shared success.

92,824

employee training hours

3,272 kg

recycled waste

93%

average Customer Satisfaction (CSAT) score

Mohammed bin Abdulaziz Alomair



Year in Review

In 2025, elm continued strengthening its sustainability performance across environmental stewardship, workforce development, digital innovation and responsible governance.

The following highlights summarize key achievements across the Company's strategic sustainability pillars.

Environment

7.7%
reduction in electricity consumption year-on-year, despite operational growth

12.1%
reduction in GHG emissions intensity

3,272 kg
of waste recycled through the Ayni Association partnership

~3.2 m^3
graywater recycled per day at headquarters

14.5%
reduction in total waste generated



Social

14.9%
increase in total employees, reaching 2,969 in 2025

48.9%
increase in total training hours reaching 92,824 in 2025

7.9%
increase in female headcount, reaching 490 employees

23
employees with special needs (increased from 2 in 2024)

#2 million
contributed to community investment initiatives

Year in Review continued

Digital

44.9 million
invested in research

20.3%
increase in innovation investment, reaching 9.5 million

85%
Customer Satisfaction Index Score

92%
complaint resolution rate, despite increased service volumes

12,000+
beneficiaries served through the Ajwaa Platform

> As a national digital enabler, the Company contributes to economic diversification, enhances efficiency and supports the development of a knowledge-based digital economy

Governance

Subsidiary Governance Framework
implemented to enhance oversight across wholly owned entities

Zero material cybersecurity incidents

ISO/IEC 27701
certification achieved

Zero data breaches or regulatory fines recorded



Awards and accreditations

Awards

Social



International Customer Experience Association (ICXA) Awards 2025

- Gold Award – Makkah Route Initiative (Execution and Impact category)
- Gold Award – Culture House (Customer-Centric Culture category)



Saudi Customer Experience Awards (SCXA) 2026

- Gold Award – Municipal Inspection and Audits Project (Best Customer-Centric Culture Program)
- Gold Award – Heritage Centers Project (Customer Experience Strategy category)
- Gold Award – Thiqah (Best Measurement in Customer Experience category)
- Gold Award – Thiqah (Customer Experience Team of the Year category)



Cultural Communication Award

- Makkah Route Initiative recognized for enhancing positive cultural representation



Saudi Customer Experience Awards (SCXA) 2026

- Bronze Award – Najiz Project (Best Marketing Campaign in Customer Experience)



Transform Awards MEA

- Silver Award – Culture House (Best Visual Identity, Public Sector category)



International Business Awards (Stevie Awards) 2025

- Silver Stevie Award – Human-Centered Innovation Initiative



Corporate Social Responsibility Awards 2025

- Silver Award – Social Responsibility Practices Track (Ministry of Human Resources and Social Development)



Wateen Platform Awards 2025

- Silver Award – Thiqah recognized as a blood bank-friendly organization

Governance



Uptime Institute (USA)

- Tier III Facility Certification – Thiqah Data Center

Digital



Digital Experience Maturity Index 2025

- Abshar ranked 1st overall
- Logisti platform ranked 6th in complaints handling



Saudi Customer Experience Awards (SCXA) 2026

- Gold Award – Najiz Project (Best Use of Technology in Customer Experience)
- Gold Award – Digitalization Project (Best Digital Transformation)



Saudi Customer Experience Awards (SCXA) 2026

- Silver Award – Al-Baqi' Project (Best Innovation in Customer Experience category)



Saudi Customer Experience Awards (SCXA) 2026

- Bronze Award – Social Case Surveying Project (Best Use of Artificial Intelligence)



Middle East Technology Excellence Awards 2025

- Aamaly Platform winner – Fintech-IT category



FINNOVEX Saudi Arabia Awards 2025 (IBI Union)

- Dhamen recognized for contribution to empowering the Fintech sector



Golden Tree Awards – Arabian Best of the Best 2025

- Dhamen awarded Best Finance Technology Company



Digital Government Forum Awards 2025

- Best Digital Partner by the Digital Government Authority



Global Digital HR Transformation and Analytics Awards 2025

- Digital Excellence in Human Resources Award (by Corporate World Intelligence in collaboration with SHRM)



HR Connect Riyadh 2025 (SAP)

- HCM Digital Transformation Excellence Award – Middle East and Africa

Awards and accreditations continued

Certifications

Environmental

Circular Economy and Sustainable Practices Certification

- Certified Circular Economy Supporter and Sustainable Practices Champion (Green Category) by Eayni Recycling Association

Social

ISO 10002:2018 Certification

- Customer Complaints Handling and Customer Service

Digital

SDAIA Accreditation

- Artificial Intelligence Service Provider Accreditation – Thiqah

Governance

ISO 27701:2019 Certification

- Privacy Information Management System (PIMS)

ISO 37301 Certification

- Compliance Management System

ISO 9001:2015 Certification

- Quality Management System

Business Agility Institute Certification

- 3-Star Certified Agile Organization™

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Aligned with
12
United Nations Sustainable Development Goals (UN SDGs)

Sponsored
25
conferences

At elm, sustainability is aligned with the Company's corporate strategy, operating model and approach to creating long-term value.

elm's ESG material topics are informed by a comprehensive materiality assessment conducted to identify the issues most relevant to the Company's business model, stakeholders and long-term value creation. Material topics refer to the issues that reflect the organization's most significant impacts on the economy, the environment and people, guiding elm's sustainability priorities and value creation approach.

2025 Materiality Review Process

In 2025, the Company initiated a structured review of its material topics to ensure continued alignment with its corporate strategic priorities, evolving regulatory expectations, national digital ambitions and global sustainability standards, leveraging a comprehensive three-step process:



1

External landscape analysis

2

Prioritization and refinement

3

Ongoing validation and finalization

Focus Areas



Environment

- Climate Change and Energy Use
- Sustainable Resource Management

Social

- Talent Development and Retention
- Employee Health and Wellbeing
- Diversity, Equity and Inclusion
- Community Development and Digital Inclusion

Digital

- Digital Transformation and Innovation
- Customer Centricity
- Responsible AI

Governance

- Governance, Ethics and Accountability
- Cybersecurity and Data Privacy
- Human Rights in the Value Chain

Sustainability Framework

GRI 3-3

elm's sustainability framework translates the Company's sustainability focus areas into four strategic pillars, each linked to a defined objective. It represents a refinement of elm's previously disclosed material topics and strategic structure.

As elm's broader Sustainability Strategy continues to be developed, described in the following Sustainability Strategy Development section, this framework provides continuity with prior disclosures while incorporating the year's emerging focus areas.

Strategic Pillars	UN SDGs Alignment	Saudi Vision 2030 Alignment	Focus Areas	Objective
Environmental Impact and Management	6 Clean Water and Sanitation; 12 Responsible Consumption and Production; 13 Climate Action	A Vibrant Society	▪ Climate Change and Energy Use ▪ Sustainable Resource Management	To reduce environmental impacts across elm's operations by improving energy efficiency, managing emissions and advancing responsible resource stewardship, supporting national climate ambitions and sustainable operational performance.
People and Community Empowerment	3 Good Health and Well-being; 4 Quality Education; 5 Gender Equality; 8 Decent Work and Economic Growth; 10 Reduced Inequalities; 17 Partnerships for the Goals	A Vibrant Society	▪ Talent Development and Retention ▪ Employee Health and Well-being ▪ Diversity, Equity and Inclusion ▪ Community Development and Digital Inclusion	To empower people and communities by fostering an inclusive, skilled and resilient workforce while promoting Well-being, equal opportunity and digital inclusion that contributes to sustainable social development.
Digital Excellence and Experience	8 Decent Work and Economic Growth; 9 Industry, Innovation and Infrastructure; 11 Sustainable Cities and Communities	A Thriving Economy	▪ Digital Transformation and Innovation ▪ Customer Centricity ▪ Responsible AI	To drive digital excellence by delivering secure, innovative and customer-centric digital solutions that accelerate national digital transformation, strengthen technology leadership and support sustainability.
Responsible Governance and Oversight	12 Responsible Consumption and Production; 16 Peace, Justice and Strong Institutions	An Ambitious Nation	▪ Governance, Ethics and Accountability ▪ Cybersecurity and Data Privacy ▪ Human Rights in the Value Chain	To uphold strong governance, ethical conduct and responsible technology practices by reinforcing transparency, data protection, risk management and accountability across the organization and its value chain.



Sustainability Strategy Development

GRI 3-3

At elm, sustainability is aligned with the Company's corporate strategy, operating model and approach to creating long-term value. As a national digital enabler, elm's business model is inherently linked to enabling sustainable government services, strengthening digital infrastructure and ensuring resilient revenue growth.

Recognizing the increasing importance of these considerations in shaping responsible and future-ready organizations, and pursuant to the Board of Directors' direction, elm is currently developing a comprehensive Sustainability Strategy. Once completed, the Strategy will define the Company's sustainability vision, strategic priorities and governance framework, ensuring that sustainability practices will be integrated into business decision-making, workforce engagement and operational execution.

This development is currently being carried out through a rigorous, evidence-based process that includes cross-functional data analysis, materiality assessment, peer benchmarking and extensive internal stakeholder engagement. The methodology also focuses on evaluating and updating the materiality matrix, which identifies the ESG topics most critical to business performance and stakeholder expectations, forming the foundation for the strategy and related disclosures. This materiality review, outlined in the Materiality Assessment section of this report, forms one of the key inputs into this broader Strategy.

Following the prioritization of these topics, the next steps will include conducting an internal review and obtaining endorsements from executive management and the Board of Directors to ensure the engagement of relevant entities in reviewing the outcomes and confirming alignment with the Company's institutional objectives. These integrated efforts are intended to develop a framework aligned with corporate directions, supported by a roadmap of initiatives, KPIs, performance metrics and implementation mechanisms, to drive long-term sustainable impact and integration into business operations.

Stakeholder Engagement

GRI 2-29

At elm, stakeholder engagement is a structured and continuous process that informs strategic direction, operational execution and long-term value creation. We recognize that developing strong and trusted relationships depends on open communication, mutual respect and a shared commitment to national progress.

Our engagement model encompasses internal, external and sectoral stakeholders, including the Board of Directors, employees, regulators, customers, suppliers, communities and investors. Through engagement channels, elm ensures that sustainability considerations, risk oversight, innovation priorities and digital enablement objectives remain aligned with stakeholder expectations.

Through this multi-layered engagement approach, elm ensures that stakeholder needs directly inform strategic priorities, sustainability commitments and operational improvements.

	Internal Stakeholders		External Stakeholders				
	Board of Directors	Employees	Regulators	Customers	Suppliers	Community	Investors and Analysts
Key Activities and Practices in 2025	• 11 Board meetings held during the year • 17 Board Committee meetings held in total (i.e. Audit, Risk, Nominations and Remunerations, and Investment Committees)	• Annual Employee Engagement Survey • Meeting regularly with the Chief Executive Officer • HR committees for communication and employee concerns • Quarterly Employee Voice meetings • Internal platforms for participation (e.g., Diwan, Yamer)	• Hosting inspectors and providing required documentation • Direct communication with regulators (e.g., letters, emails, meetings) • Participating in workshops and public consultations	• Conducted 102 customer satisfaction surveys • Visited 2 customers from the public and private sectors • Conducted 25 quarterly studies to understand customer needs and feedback • Recommendation on level by customers in 2025 of 91% • Translated customer feedback into 221 corrective action plans across more than 21 underperforming products, and implemented more than 360 customer-driven improvement actions in coordination with internal teams to enhance customer experience	• Daily communication with suppliers through elm's platforms • Registration of 924 new suppliers on the procurement portal • Annual Vendor Day held to engage with suppliers	• Sponsored 25 conferences • Donated ﷼ 2 million in 2025 as community investments • Partnered with schools and universities to train more than 184 students • Signed 25 MoUs to support community impact • Implemented 6 social initiatives throughout the year	• Conducted two virtual General Assembly Meetings • Conducted semi-annual Earnings Calls • Participated in nine local, regional and international investor conferences • Participated in 83 meetings with local and international investors and analysts
Key Items Discussed	• Review of financial performance and budget • Company strategy and governance • Policies and compensation • Risk management and monitoring • Investment oversight • Review and approval of sustainability reporting • Overseeing the implementation of the Company's strategy and key plans, and reviewing them periodically • Ensuring the effectiveness of the Company's internal control and risk management systems • Monitoring the Company's compliance with applicable laws, regulations, and regulatory requirements	• Workplace culture and work environment • Employee feedback, suggestions and concerns • Company goals and updates • Compensation and benefits • Health and safety • Training and development needs • Conflict resolution	• Regulatory compliance and legislative updates • Performance indicators and reporting requirements • Policy alignment and sectoral developments	• Overall customer satisfaction and experience gaps • Unmet customer expectations across products and journeys • Perceived value of elm's services and digital platforms • Customer-drive ideas to better support customer success	• Supplier registration process • Tendering processes • Contract terms and conditions • Invoicing lifecycle support • Supplier performance and relationship management	• Supporting local communities • Enhancing digital accessibility • Promoting job creation and economic empowerment	• Latest announced news • Strategic outlook • Operational overview • Financial performance and guidance • Sustainability initiatives and objectives
Approach to Response and Engagement	• Set the Company's strategic direction • Oversaw performance, risk and major decisions • Ensured strong governance and accountability • Reviewed and approved sustainability reporting and ESG disclosures	• Provided training and development opportunities • Offered competitive compensation and comprehensive benefits • Supported career growth and advancement • Cultivated a positive and inclusive work environment • Prioritized employee well-being and mental health • Ensured clear expectations with continuous feedback	• Submitted compliance reports within required deadlines • Updated internal policies and procedures • Implemented regulatory recommendations and corrective actions • Assigning dedicated staff for regulatory coordination	• Continuous monitoring of customer satisfaction • Addressed customers' key concerns and unmet needs • Coordinated with internal teams to improve service delivery and customer experience	• Engaged new suppliers for upcoming opportunities • Supported SME participation in procurement • Ensured compliance and mitigated supply-related risks • Facilitated smooth project delivery and issue resolution • Participation in external events to strengthen supplier relationships	• Contributed to the community through donations and sponsorships • Partnered with educational institutions to train students and support talent development • Provided free services to charitable and community organizations	• Continuous communication with investors through regular updates via emails, phone calls and conferences • Provided clear insights into the Company's strategy, operational performance and financial results • Held direct meetings to address investor inquiries and clarify key performance metrics • Published quarterly results and disclosures through Investor Relations platforms

Across its strategic pillars and digital initiatives, elm continues to contribute directly to the objectives of Saudi Vision 2030 by enabling digital government services, strengthening national digital infrastructure and advancing emerging technologies such as artificial intelligence and data platforms.

A Vibrant Society

Driving Innovation and Broader Digital Impact

Supporting Social Impact Digitally and Through Donations

Thriving Economy

Business Enablement and Operational Efficiency

Human Capital Development and Inclusive Growth

Ambitious Nation

Government Digital Enablement and Service Efficiency

For further details on elm's role in supporting Saudi Vision 2030 programs, please refer to the 2025 Annual Report (page 48).

Supporting the UN SDGs

elm integrates sustainability principles across its operations, digital platforms and partnerships to support the United Nations Sustainable Development Goals (SDGs). Through responsible innovation, digital enablement and workforce development, elm contributes to sustainable economic growth, social inclusion and the advancement of Saudi Arabia's digital transformation.

This approach ensures that elm's 2025 initiatives support national development priorities while contributing to global sustainable development efforts.



Good Health and Well-Being

Target: 3.4 | 3.8

elm contributes to improved healthcare accessibility and outcomes through digital health solutions and AI-enabled technologies.

Key initiatives include:

- Development of digital health platforms such as Efada, introducing a real-time Live Chat feature, enabling the immediate delivery of medical examination results to government entities, improving user experience supporting healthcare coordination and service efficiency
- AI-powered autism detection tools using computer vision to enable earlier diagnosis and intervention
- Launched the Nashratech Platform in partnership with the Gulf Health Council, providing instant digital access to official medication leaflets through QR codes



Quality Education

Target: 4.3 | 4.4 | 4.5

elm supports education and skills development through workforce training, partnerships with academic institutions and digital talent development initiatives.

Key initiatives include:

- Collaboration with universities to support research, training and digital skills development, with more than 184 students trained
- Expansion of internal AI learning programs to strengthen employee capabilities in emerging technologies
- More than 1,500 employees participated in structured training programs aligned with professional development goals and organizational growth priorities, with equal and non-discriminatory access for all



Gender Equality

Target: 5.1 | 5.4 | 5.5 | 5.b

elm promotes an inclusive and equitable workplace by supporting women's participation and leadership within the technology sector.

Key initiatives include:

- Equal employment opportunities and inclusive recruitment practices
- Career development and leadership programs supporting female talent, contributing to 22.6% female workforce representation in 2025
- Workplace policies that support work-life balance and professional growth



Clean Water and Sanitation

Target: 6.4

elm supports responsible water management through efficiency measures and resource optimization across its facilities.

Key initiatives include:

- Implementation of a gray water treatment system at headquarters recycling approximately 3.2 cubic meters of water daily
- Deployment of smart monitoring systems to improve water efficiency across facilities

Supporting the UN SDGs continued



Decent Work and Economic Growth

Target: 8.2 | 8.3 | 8.5 | 8.6 | 8.8

elm contributes to national economic growth and job creation by expanding Saudi Arabia's digital economy and developing national technology talent.

Key initiatives include:

- The acquisition of Thiqah Business Services Company and investments in Torod and LoftyInc
- Opened a new office in Muscat, expanded into Jordan, and began discussions with the new Syrian government
- New services introduced on the Khibrah Platform, activating consulting, healthcare, insurance, inspection and arts and culture domains, enabling structured digital collaboration among judges, lawyers and certified experts
- Graduate recruitment and professional development programs for Saudi talent such as the Afuq program
- Launch of several platforms and services, including Enjz Platform and Marjea Platform
- Support for SMEs through digital services and procurement opportunities, while promoting fair employment practices and safe working environments



Industry, Innovation and Infrastructure

Target: 9.1 | 9.5 | 9.b | 9.c

Innovation and digital infrastructure are core to elm's strategy as a national digital enabler, driving the continuous development of scalable government and enterprise digital platforms.

Key initiatives include:

- Development of AI-enabled public digital services, including Absher Assistant and Nusuk Assistant
- The refinement and launch of Nuha, elm's Arabic-first LLM. Nuha became the engine behind a growing suite of AI-powered products
- Deployed a computer vision solution at the Qiyas Jeddah Exam Center to autonomously monitor candidates for prohibited behavior
- The development of a 3D reconstruction system that uses large-scale satellite imagery to build digital twins
- Five granted patents and seven additional filings across LLMs, simulation, computer vision and edge hardware
- Research and AI also strengthened collaborations with national and other global institutions



Reduced Inequalities

Target: 10.2 | 10.3 | 10.4

elm improves digital accessibility by developing platforms and technologies that enable equitable access to users and communities.

Key initiatives include:

- AI-enabled digital assistants that support multilingual access to government services
- Platforms designed to serve citizens, residents and visitors across diverse user groups
- Strengthening disability inclusion, reaching 23 employees with disabilities in 2025 up from two in 2024



Sustainable Cities and Communities

Target: 11.2 | 11.3

elm supports the development of smarter and more connected cities through digital government platforms and data-driven services.

Key initiatives include:

- Developed the Port Community Systems across several ports in the Kingdom, improving operational efficiency at border crossings by integrating truck scheduling with insurance providers at the King Fahd Causeway
- Introducing real-time operational dashboards for King Fahd Causeway, Jeddah Islamic Port and King Abdulaziz Port, enabling a more efficient and streamlined logistics operations while optimizing data management and enhancing transparency
- Launched Salasel, a comprehensive logistics platform that uses shipment data analytics to allow customers to manage import and export processes more smoothly and efficiently
- Deployed a Truck Management System in collaboration with Saudi Arabia Railways to improve operational efficiency and strengthen coordination between both road and rail freight transport

Supporting the UN SDGs continued



Responsible Consumption and Production

Target: 12.2 | 12.5 | 12.6 | 12.7 | 12.8

elm promotes responsible resource management across its facilities through structured waste management, circularity initiatives and asset lifecycle optimization.

Key initiatives include:

- Structured waste segregation and recycling partnerships support circular resource management, earning recognition as a Certified Circular Economy Supporter and Sustainable Practices Champion (Green Category) by Eayni Recycling Association
- Employees are supported with clear guidance on responsible e-waste disposal, helping to strengthen awareness and ensure consistent practices across the organization
- Recycled 3,272 kilograms of recyclable waste in cooperation with a certified recycling association
- Printing optimization initiatives reducing paper consumption by more than 34% in 2025



Climate Action

Target: 13.2 | 13.3

elm contributes to climate action by improving resource efficiency and integrating sustainability considerations into technology development.

Key initiatives include:

- Monitoring Scope 1 and Scope 2 emissions in alignment with the GHG Protocol
- Energy optimization through LED upgrades, smart HVAC controls and Building Management Systems
- Reduction of total emissions by 7.7% in 2025 through improved energy performance
- Produced two awareness campaigns promoting recycling and waste segregation



Peace, Justice and Strong Institutions

Target: 16.5 | 16.6 | 16.b

elm strengthens institutional effectiveness and public trust through responsible governance, cybersecurity and ethical technology practices.

Key initiatives include:

- Strong corporate governance structures and compliance frameworks
- Continuous investment in cybersecurity, data protection and digital resilience
- Responsible AI governance aligned with national and international regulatory frameworks



Partnerships for the Goals

Target: 17.7 | 17.17 | 17.18

Partnerships are central to elm's ability to deliver large-scale digital transformation.

Key initiatives include:

- Strategic collaborations with government entities including Ministry of Interior, Ministry of Hajj and Umrah, SDAIA, the Saudi Ports Authority and Zakat, Tax and Customs Authority
- Partnerships with universities and technology organizations such as KAUST and Princess Nourah University to advance research and digital innovation
- Cooperation with private-sector partners to expand digital services and national digital infrastructure
- Investing ﷼ 2 million in diverse community projects and sponsorships to support social, educational, health, environmental and economic development

Environmental Impact and Management

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~3.2m³

Graywater recycled per day at headquarters

14.5%

Reduction in total waste



elm integrates environmental considerations across its operations to ensure its digital expansion progresses in alignment with the Kingdom's broader sustainability ambitions under Saudi Vision 2030.

Overview

As a leading digital solutions provider, elm's operations are built on a network of offices, operational facilities and digital infrastructure that support its platforms and services. Efficient management of energy, water and materials is therefore essential, making resource efficiency and responsible environmental management key to strong performance, cost management and long-term business continuity.

With the expansion of its digital platforms and national service footprint, effective environmental management is becoming increasingly material to the Company's business model and long-term value creation.

Through a structured environmental management approach built on optimizing resource use, strengthening resilience to evolving regulatory and climate-related expectations and reinforcing stakeholder confidence in sustainability governance, elm integrates environmental considerations across its operations to ensure its digital expansion progresses in alignment with the Kingdom's broader sustainability ambitions under Saudi Vision 2030.

Building on this approach, elm actively manages its environmental impact by protecting natural resources and optimizing energy and water use across its operations. Waste segregation and recycling are embedded within operational practices, while environmental considerations are integrated into facilities management and asset planning to ensure that growth and infrastructure development proceed sustainably.

elm's environmental efforts therefore focus on improving the efficiency and management of key operational resources. This includes optimizing energy use across facilities through enhanced monitoring, operational controls and infrastructure upgrades, strengthening the measurement and management of operational emissions across its facilities and infrastructure.

These efforts are guided by the sustainability objectives of Saudi Vision 2030, supported by compliance with national environmental regulations and aligned with leading international ESG frameworks, including the United Nations Sustainable Development Goals (UN SDGs).



2025 Highlights

As elm's sustainability framework continues to mature, 2025 delivered measurable progress across energy, emissions, waste and water management.

7.7%
reduction in electricity consumption year-on-year, despite operational growth

7.7%
reduction in total GHG emissions, driven by lower Scope 2 emissions

12.1%
reduction in GHG emissions intensity

3,272 kg
of waste recycled through the Ayni Association partnership

3.2 m^3
approximate recycling of gray water per day at headquarters

14.5%
reduction in total waste generated

Climate Change and Energy Use

GRI 302-1, 302-3, 302-4, 305-1, 305-2, 305-4
SASB TC-SI-130a.1, TC-SI-550a.2

As a national digital solutions leader, elm's exposure to climate change is primarily operational rather than industrial. Although the Company does not operate carbon-intensive assets, its growing infrastructure footprint – including offices, service centers and data environments – creates measurable energy demand and associated emissions. Climate-related performance therefore matters for three strategic reasons.

1 Operational resilience
Extreme weather events and infrastructure disruptions could impact service continuity across mission-critical national platforms.

2 Regulatory and stakeholder expectations
National sustainability ambitions and emerging ESG requirements require structured emissions oversight.

3 Cost discipline and efficiency
Energy optimization directly improves operating efficiency and long-term financial sustainability.

Climate Risks

SASB TC-SI-550a.2

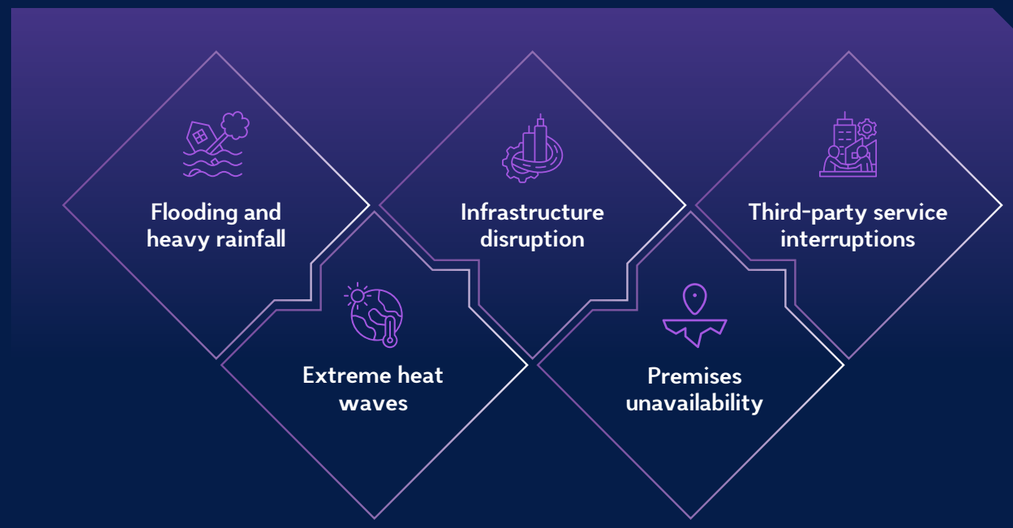
Climate-related risks are embedded within elm's broader approach to enterprise risk management and business continuity, which is overseen by the Risk Management and Business Continuity department and reported quarterly to the Board-level Risk Committee.

elm operates under the ISO 22301 standard for Business Continuity Management and maintains a comprehensive framework to safeguard its operations. This includes annual risk assessments; detailed business impact assessments (BIA) with more than 92 completed across departments; regular crisis simulation exercises and scenario testing, and an integrated Incident and Crisis Management structure that ensures coordinated, rapid responses and sustained operational resilience.

These risks are recorded within the ERM risk register and assessed alongside operational, strategic and compliance risks.

Physical Climate Risks

Considering the nature of elm's operations, the Company faces several primary physical climate risks. These include the following.



Facilities are prepared for heavy rain events and remote working strategies form part of recovery planning. Additionally, heat-related risks are mitigated through certified facilities, HVAC redundancy and infrastructure readiness.

Data center resilience is critical. Backup data centers, located 800 to 900 kilometers from primary facilities, can be rapidly activated if required, ensuring uninterrupted service delivery. Advanced continuous monitoring systems trigger escalation protocols via automated alerts, reinforcing operational reliability and business continuity.

Scenario analysis includes national disasters and third-party disruptions to make sure climate-related disruptions do not materially compromise national platform availability.

Transition and Regulatory Risk

elm adopts a proactive regulatory posture. Emerging national frameworks are continuously monitored and compliance requirements are anticipated ahead of formal implementation. While ESG risks are not yet categorized separately within the risk management framework, sustainability-related risks are integrated across governance and strategic risk categories.

As elm develops its sustainability strategy, the Company is working to further formalize the integration of environmental risks within enterprise risk identification processes. This approach is intended to support alignment between sustainability commitments and corporate growth objectives, helping minimize the risk of strategic misalignment.

Emissions Management

GRI 305-1, 305-2, 305-4

elm currently monitors Scope 1 and Scope 2 greenhouse gas (GHG) emissions across its operations in alignment with the GHG Protocol. These emissions primarily arise from purchased electricity consumption across facilities and limited direct fuel use associated with backup systems and operational equipment. The Company's emissions profile is largely driven by energy consumption within its digital infrastructure and operational facilities.

In 2025, total emissions decreased by 7.7%, driven primarily by reductions in Scope 2 emissions. Scope 1 emissions remain minimal and stable, reflecting limited direct fuel combustion. Emissions intensity ($MtCO_2$/employee) also improved, declining from 0.65 in 2024 to 0.57 in 2025, reflecting enhanced operational efficiency despite workforce and operational growth.

With Scope 2 emissions accounting for the vast majority of total emissions, energy efficiency remains the most significant driver of decarbonization. The Company leverages advanced technologies, including eCO_2 sensors integrated with building management systems (BMS) and motor control units (MCU), to monitor emissions in real time and manage them effectively, enabling the automatic activation of jet and exhaust fans when eCO_2 levels reach a peak reading of 300–450 ppm.



Climate Change and Energy Use continued

Greenhouse Gas (GHG) Emissions

Scope 1 GHG emissions ($MTCO_2e$)

2025	**2.13**
2024	**2.13**
2023	**2.13**

Scope 2 GHG emissions ($MTCO_2e$)

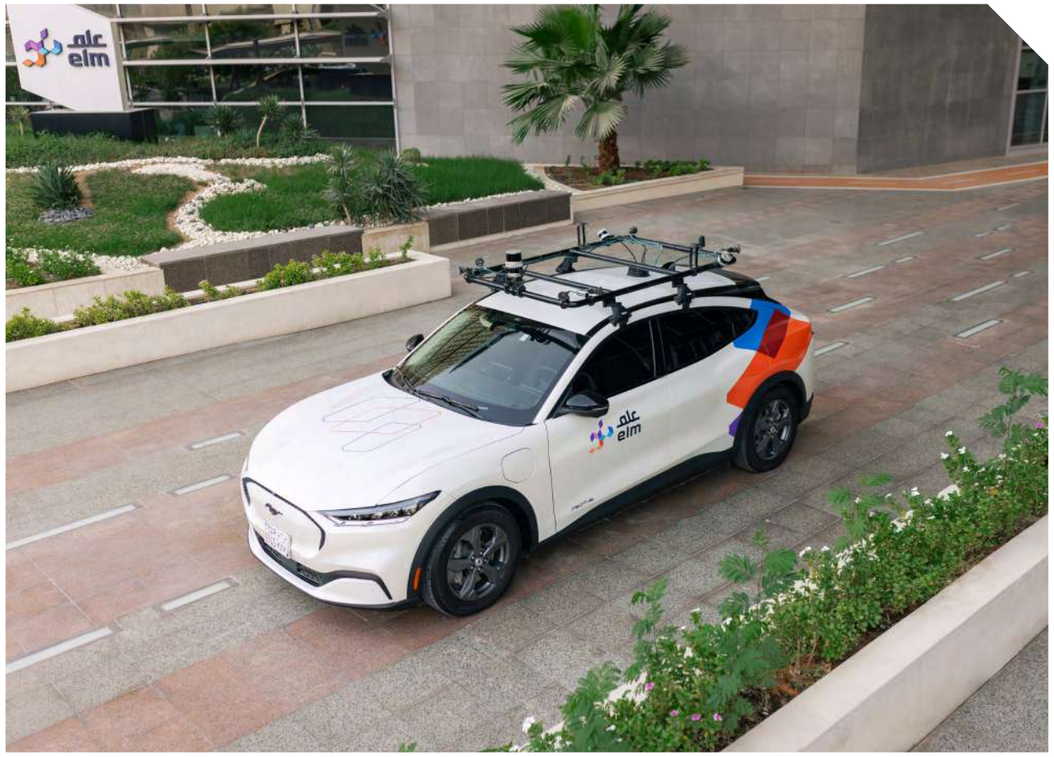
2025	**1,240.64**
2024	**1,344.11**
2023	**1,337.28**

Total GHG emissions ($MTCO_2e$)

2025	**1,242.77**
2024	**1,346.24**
2023	**1,339.41**

GHG emissions intensity ($MTCO_2e$/employee)

2025	**0.57**
2024	**0.65**
2023	**0.79**



Case Study

ELM Green – **Tree Planting Initiative**

Objective

To strengthen employee awareness of environmental responsibility, the Tree Planting Initiative aimed to encourage active participation in greening efforts through hands-on planting activities.

Strategy

The initiative focused on employee engagement as a driver of environmental impact. Through collaborative planting activities, employees were encouraged to take an active role in supporting sustainability objectives, contributing to the enhancement of green spaces.

Looking Forward

elm will continue to promote employee-led sustainability initiatives that encourage practical engagement and support broader environmental objectives, while fostering a culture of shared responsibility and long-term environmental stewardship.

Approach

The initiative combined environmental education with hands-on action, giving employees the opportunity to contribute directly to tree planting activities. By linking awareness with participation, the program reinforced the importance of environmental responsibility and encouraged a stronger culture of sustainability across the workplace.

Results

The initiative delivered positive environmental and engagement outcomes:

- 50 seedlings were planted by elm employees
- Strong employee participation and engagement were achieved throughout the activity
- Environmental awareness and sustainability engagement were further strengthened across the workplace



Climate Change and Energy Use continued

Energy Performance

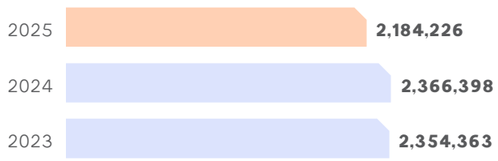
GRI 302-1, 302-3, 302-4

Aligned with its sustainability objectives and Saudi Vision 2030 ambitions, elm prioritizes energy performance as a core component of environmental management. Electricity consumption represents the Company's primary environmental impact, making structured optimization essential for operational efficiency, cost management and sustainable growth.

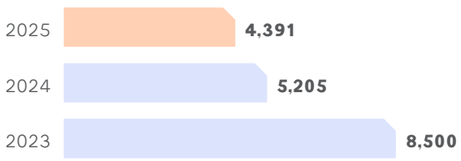
The Company continues to enhance efficiency across its operational footprint through infrastructure upgrades, system optimizations and behavioral measures. These actions contributed to a 7.7% reduction in electricity consumption compared to 2024, despite expanded facilities, higher employee density and increased HVAC demand owing to climatic conditions. This demonstrates that elm's approach effectively offsets growth-related pressures while maintaining operational performance.

Energy Consumption

Electricity consumption (kWh)



Electricity, heating and steam purchased for consumption (kWh)



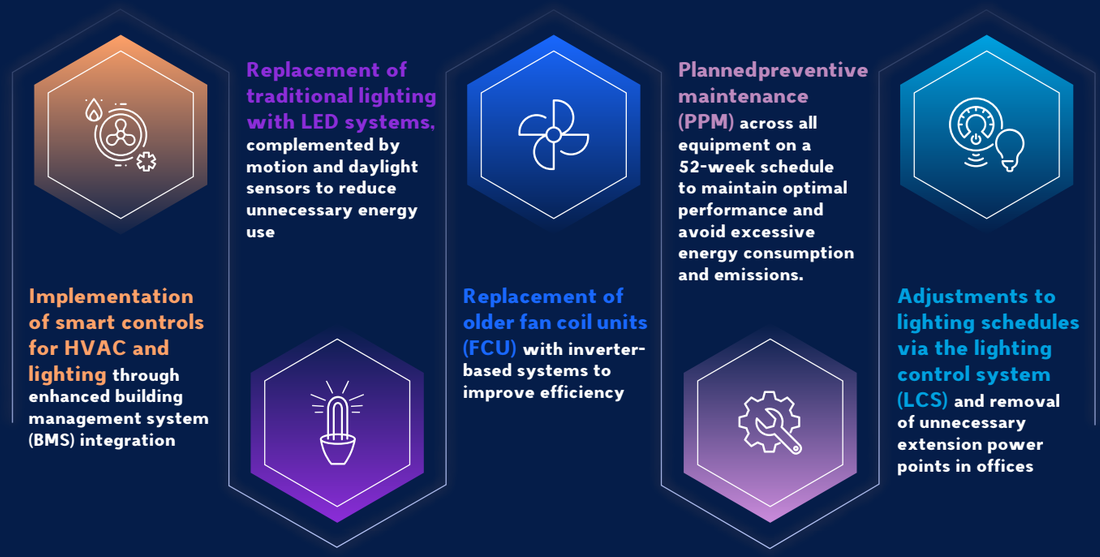
Fuel Consumption

	2025	2024	2023
Diesel consumption (gallons)	**800**	800	800

The Company continues to enhance efficiency across its operational footprint through infrastructure upgrades, system optimizations and behavioral measures.

Energy Optimization Initiatives

elm continues to enhance energy performance across its facilities through a combination of behavioral measures, infrastructure upgrades and advanced control systems:



Electric Vehicle (EV) Charging Service

To advance low-emission mobility, elm introduced an EV charging service as part of its workplace sustainability initiatives. The initiative enables employees who own electric vehicles to charge their cars at the workplace through dedicated charging stations. Two EV charging docks have been installed at the Thuraya building parking area. The service aims to encourage employees to adopt electric vehicles by providing the necessary supporting infrastructure and promoting the use of low-emission transportation options in line with the Company's sustainability goals and efforts to reduce carbon emissions.



Sustainable Resource Management

As elm's national footprint expands, responsible resource management becomes increasingly material to operational efficiency, regulatory compliance and long-term value creation. Although elm is a digital enterprise, its facilities operations manage several physical resource streams, including waste (general waste, paper, food waste and recyclable materials) and water (freshwater consumption and recycled gray water).

Waste Management

GRI 306-1, 306-2, 306-3

Waste generation is directly linked to operational growth, employee density and facility expansion. Structured waste management practices help reduce landfill dependency, improve compliance, support circular economy objectives and strengthen elm's environmental credibility. Waste management also delivers measurable financial and social returns when recycling systems are structured effectively.

elm's waste management strategy is built on a structured, system-based approach designed to move beyond ad hoc recycling practices toward embedded operational accountability. Rather than relying solely on individual behavior, the Company has developed an integrated approach to waste management, structured around four complementary pillars:

- Segregation at source
- Responsible recycling partnerships
- Organic waste circularity
- Lifecycle extension of assets

In 2025, total waste decreased by 14.5% in comparison to the previous year, despite continued operational growth.

Waste Management

	2025	2024	2023
Total waste generated (kilograms)	**37,000**	43,300	40,000

Structured Waste Segregation

At the foundation of elm's waste strategy is a structured segregation system implemented across all operational sites. Color-coded bins have been installed in offices and common areas to separate paper, general waste and food waste streams. Clear signage is positioned at collection points to provide instructional guidance, ensuring employees understand how to dispose of materials correctly.

Waste management practices are introduced to new employees during onboarding, reinforcing environmental responsibility from the outset. Throughout the year, the Company conducted two awareness campaigns with dedicated videos that were disseminated through elm's internal portal and employee Snapchat accounts.

Cleaning teams receive dedicated training on waste handling procedures to prevent contamination after collection and ensure segregated waste streams remain separated during handling and transport.

elm also leverages advanced cleaning technologies to enhance waste management operations. Smart autonomous cleaning robots operating on preprogrammed schedules support efficient cleaning practices, improve service quality and reduce reliance on manual processes while optimizing resource use across facilities.

To support effective oversight, measurable KPIs and annual compliance targets have been established to monitor performance. This shift toward structured measurement and accountability has transformed waste segregation from a voluntary initiative into a monitored operational process embedded within facilities management.

Recycling Partnerships

To make certain that segregated materials are responsibly processed downstream, elm has partnered with Ayni Cooperative Recycling Association, a leading environmental sustainability organization. The partnership formalizes recycling operations through scheduled pickups, designated storage areas and tracking of recycled units.

Beyond environmental impact, this collaboration carries a strong social dimension. A portion of the proceeds generated from recycling activities is directed toward supporting orphan care programs, reinforcing elm's commitment to linking circular economy practices with broader community impact. Through this partnership, waste reduction becomes both an environmental and social value driver for elm.

elm has been awarded the Certificate of Support for Circular Economy and Sustainable Practices – Green Category by the Ayni Association

3,272 kg of waste recycled

Food Waste Circularity

Recognizing that organic waste constitutes a significant portion of office-generated waste, elm introduced a food waste recycling initiative within its cafeteria operations. Specialized equipment converts leftover food into compost, which is then reused for landscaping purposes across Company facilities.

This closed-loop approach reduces landfill disposal of organic materials, supporting soil health and plant maintenance within elm's premises. By transforming food waste into a productive resource, elm strengthens its circular resource management practices and reduces environmental burden.

Asset Lifecycle Extension

Furniture refurbishment programs and laptop lifecycle extension initiatives reduce unnecessary procurement and extend the useful life of materials and equipment.

During corporate rebranding, outdated printed materials were collected and responsibly recycled rather than discarded. Similarly, assets from the children daycare facility were recovered and processed to prevent avoidable waste.

An internal office organization campaign further encouraged employees to declutter responsibly and redirect unused materials into appropriate recycling channels.



Sustainable Resource Management continued

Case Study

IT-Led Printing **Optimization**

Objective

To support elm's commitment to environmental stewardship, the Printing Optimization Initiative aimed to reduce paper consumption and promote digital alternatives across the organization.

Approach

The initiative focused on optimizing the printer fleet and encouraging sustainable printing practices. Key actions included phasing out 16 shared printers, reducing overall paper consumption by more than 34%, and promoting the adoption of digital documentation and workflow tools. The reduction of personal printers within offices is ongoing.

Energy efficiency was a key consideration throughout, with all devices meeting Energy Star standards. This ensures maximum efficiency through features such as automatic low-power sleep modes, highly efficient internal power supplies and energy performance approximately 40% better than standard models.

Strategy

The initiative was guided by a Managed Print Services (MPS) framework, optimizing the printer fleet with high-efficiency multifunction devices (MFD) to reduce idle energy use. Key measures included:

- Fleet optimization: Replacing multiple desktop printers with a few high-efficiency MFDs
- Three-tier billing: Contracts incentivize reduced printing by charging per page, enabling management to track usage and costs
- User authentication (pull printing): Printing jobs are released only when the user is physically present, reducing waste and enhancing security

Results

The Printing Optimization Initiative delivered tangible environmental benefits, reducing paper consumption by more than 34%, from approximately 500,000 sheets in 2024 to around 330,000 in 2025.

Key outcomes include:

- Conservation of around 20 trees and 1,700 liters of fresh water
- Energy savings of approximately 850 kilowatts
- Reduction of approximately 1.5 tons of CO_2 emissions resulting from paper manufacturing and transportation processes
- Avoidance of significant amounts of paper waste and reduced use of chemicals associated with paper bleaching and manufacturing

Looking Forward

elm plans to further reduce the number of active printers and continue awareness campaigns on environmental sustainability. As part of its "Paperless" approach, digital internal forms with electronic signatures will be implemented, and a comprehensive print audit is planned to monitor usage and identify further opportunities for reduction.



Water Management

GRI 303-5
SASB TC-SI-130a.2

Water stewardship is increasingly material within Saudi Arabia's resource context. Responsible water management reduces operating costs, supports national water conservation objectives and mitigates long-term supply risk.

Headquarter water consumption increased by 9.6% in 2025 primarily as a result of higher facility utilization, the temporary maintenance of the gray water system and a slight increase in employee numbers. Despite the growth in overall consumption, water consumption intensity per employee improved to 7.3 m^3 per employee in 2025, reflecting more efficient water use relative to workforce growth.

Water Consumption

	2025	2024	2023
Headquarter total water consumption (m^3)	**6,422**	5,859	5,382
Water consumption intensity (m^3/employee)	**7.3**	7.7	7.5

Water stewardship at elm is approached through a combination of infrastructure upgrades, technology-enabled monitoring and behavioral reinforcement. As operational activity expands, the Company continues to prioritize systems that reduce freshwater dependency while improving measurement accuracy and long-term efficiency.

Gray Water Treatment System

A key milestone in elm's water management journey has been the implementation of a graywater treatment system at headquarters. This system captures and treats wastewater generated from restroom facilities and repurposes it for non-potable applications.

Approximately 3.2 cubic meters of water are recycled per day in 2025, with treated water reused for toilet flushing and irrigation. By substituting recycled water for freshwater in these applications, elm significantly reduces overall freshwater demand. This initiative represents a practical example of circular resource use within facilities operations, directly contributing to responsible water stewardship in a water-scarce national context.

~3.2 m^3
graywater recycled per day at headquarters

Smart Monitoring and Efficiency Optimization

Recognizing that effective water management depends on accurate data and responsive systems, elm is currently conducting a market assessment to evaluate advanced smart technologies that support both energy and water efficiency. The assessment focuses on identifying solutions such as:

- Smart consumption monitoring systems capable of real-time data tracking
- Automated control technologies that regulate water use based on occupancy and operational patterns
- High-efficiency conservation devices designed to minimize wastage

These technologies aim to improve measurement accuracy, enable proactive consumption management and support long-term optimization of water use across facilities. By strengthening monitoring capabilities, elm intends to transition from periodic tracking toward more data-driven and predictive resource management.

Behavioral and Operational Controls

Infrastructure upgrades are complemented by employee awareness and operational controls. Internal campaigns promote responsible water use, reinforcing the importance of conservation practices in daily activities. Facilities teams also conduct infrastructure assessments, particularly in leased buildings where modification flexibility may be limited, to identify efficiency opportunities within existing constraints.

Looking Ahead

elm's environmental roadmap continues to mature across climate resilience, energy optimization, waste circularity and water stewardship. As infrastructure expands and regulatory expectations evolve, the Company is strengthening its transition from conventional facilities management toward a more integrated, data-driven and resilience-focused sustainability model.



People and Community Empowerment

92,824
Total training hours

22.6%
Female workforce representation

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Equal opportunity and inclusion are embedded across recruitment, development and advancement processes, while community initiatives are designed to ensure that elm's digital enablement efforts generate meaningful and inclusive societal impact.



Overview

As a national digital enabler operating mission-critical platforms, elm's ability to deliver resilient services and sustained growth depends fundamentally on the strength, capability and engagement of its people. Therefore, investing in people and communities strengthens operational resilience, enhances earnings sustainability and aligns directly with elm's corporate strategic priorities and Vision 2030 objectives.

In 2025, elm strengthened its human capital architecture through structured leadership development, innovation capability building and targeted workforce engagement initiatives. Leadership development and innovation-focused training in areas such as artificial intelligence (AI), digital innovation and strategic thinking supported the development of future-ready skills across the workforce. Learning and development priorities are defined through competency frameworks, performance data and annual training needs assessments to make sure capability development meets evolving strategic requirements.

Alongside capability development, elm advanced employee engagement and workplace inclusion through structured feedback mechanisms, targeted engagement campaigns and initiatives supporting women's empowerment and the integration of employees with disabilities.

Equal opportunity and inclusion are embedded across recruitment, development and advancement processes, while community initiatives are designed to ensure that elm's digital enablement efforts generate meaningful and inclusive societal impact. Through these efforts, elm contributes to national workforce development and broader economic participation in alignment with Saudi Vision 2030.



2025 Highlights

During 2025, elm continued strengthening its human capital and community impact architecture through measurable investment, structured governance and targeted capability development.

Total employees increased by
14.9%
reaching 2,969 in 2025

Employee turnover improved, declining from 10.5% in 2024 to
8.3%
in 2025

Total training hours increased by
48.9%
reaching 92,824 in 2025

Female headcount increased by
7.9%
reaching 490 employees

Employees with disabilities increased from 2 in 2024 to
23
in 2025

2 million
in community investment for various initiatives

Talent Development and Retention

GRI 2-7, 2-8, 401-1

In 2025, elm strengthened its talent architecture across leadership, technical and early-career segments, maintaining alignment between its business strategy and workforce capability. Human capital initiatives are structured, data-informed and embedded within corporate planning processes. Workforce planning, succession mapping, performance evaluation and capability development correspond with elm's strategic priorities.

This approach positions talent management as a strategic enabler of long-term growth, workforce readiness and organizational resilience.

In 2025, total workforce reached 2,969 employees, reflecting continued expansion to support platform scaling and product diversification. Growth has been more calibrated compared to prior years, reflecting disciplined workforce planning in line with operational maturity.

Workforce size by employment type

	2025	2024	2023
Full-time employees	**2,167**	2,064	1,705
Part-time employees*	**802**	519	318
Total employees	**2,969**	2,583	2,023

* This includes contractors and consultants



Talent Acquisition and Retention Strategies

GRI 401-1

At elm, people are recognized as the primary driver of innovation, customer excellence and business expansion. Talent acquisition strategies focus on attracting high-potential national talent and specialized digital expertise in parallel with emerging platform and AI capabilities.

Targeted recruitment programs continue to attract top talent from across Saudi Arabia. Early-career pipelines remain supported by the Afuq program, which equips new employees with foundational digital and professional competencies, cultivating future leaders and innovators.

Turnover improved significantly in 2025, declining from 10.5% to 8.3%, despite workforce growth. This stabilization indicates improved retention effectiveness, competitive compensation alignment and strengthened engagement initiatives. Sustained retention supports knowledge continuity, cybersecurity resilience and leadership pipeline stability.

Competitive compensation structures, long-term incentives and structured career pathways reinforce workforce stability in a dynamic labor market.

Workforce turnover

	2025	2024	2023
Total number of employees who left the organization	**179**	217	131
Turnover rate (%)*	**8.3%**	10.5%	7.7%

* Turnover rate is calculated as the number of employees who left divided by the total number of full-time employees

Training and Development Programs

GRI 404-1, 404-2

Employee development remains a strategic priority. In 2025, more than 1,500 employees participated in structured training programs as per the corporate strategy and defined capability requirements.

1,584

Structured training programs

2024: **1,299**
2023: **1,147**

222

Leadership or management development

2024: **138**
2023: **121**

243

Certification or specialist learning

2024: **179**
2023: **116**

Talent Development and Retention continued

Workforce Learning and Capacity Building

elm recognizes that continuous learning and development are essential to sustaining its leadership in digital solutions and innovation. Training and development activities are overseen by a dedicated team and guided by elm's Training and Development Policy, ensuring a structured and needs-based approach to employee development across all levels of the organization.

Future workforce skill requirements are identified through corporate strategy, engagement with business leaders and scrutiny of workforce and performance data. These requirements are defined by structured capability frameworks and supported by an annual training needs analysis that identifies critical competencies such as digital literacy, leadership development and emerging digital skills. Competencies are further assessed through the performance management system to make certain employees remain prepared for evolving business and technological demands.

Training is delivered through a blended learning approach that includes internal and external workshops, online courses, coaching and mentorship initiatives, and project-based learning. Digital platforms such as Udacity provide employees with access to specialized learning programs and mini-diplomas across multiple disciplines to support continuous upskilling.

elm also ensures equal access to development opportunities for all employees, including women, enabling them to strengthen their capabilities and advance their careers to reinforce organizational priorities and the broader goals of Vision 2030. To support high-quality learning experiences, elm collaborates with reputable training providers and leading business schools, encouraging internal knowledge sharing and collaborative learning.

Training hours increased by approximately 48.9% year-on-year, reaching 92,824 hours in 2025, reflecting elm's continued investment in workforce capability and structured employee development.

Training and development in-person

	2025	2024	2023
Employee training (total hours)	**92,824**	62,352	13,184
Number of training beneficiaries	**1,796**	1,384	464
Average training hours per employee beneficiary (hours)	**51.68**	45.05	28.41

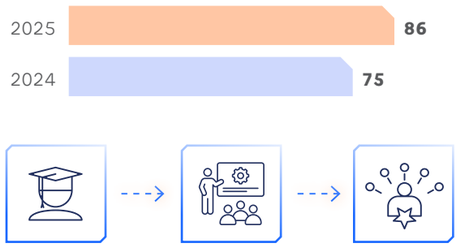
Early Career Development Programs

As part of its talent attraction and development strategy, elm offers structured programs that support early career employees at different stages of their career journey. Initiatives such as Afuq support early-career readiness and leadership development by equipping young professionals with requisite technical, analytical and professional skills within emerging technology fields.

Afuq program

The Afuq program is designed to support newly hired graduates as they transition into the workforce. The program focuses on developing essential professional and behavioral competencies and equipping participants with the skills required to grow and succeed within elm.

Afuq program participants



Leadership Development

Leadership development remains central to elm's workforce strategy. In 2025, the elm Leadership Development Program (ELDP), delivered in partnership with McKinsey, graduated its second senior cohort, strengthening strategic leadership capabilities across the organization.

Case Study

ELDP – Building Future-Ready Leaders at elm

Objective

As elm continues to scale its digital platforms and expand its service portfolio, strengthening leadership capability remains critical to sustaining organizational performance and transformation. The Company identified the need to build a strong leadership pipeline capable of driving strategic priorities while ensuring consistent leadership readiness across functions.

Approach

To address these challenges, elm designed the ELDP in partnership with McKinsey, creating a structured program focused on strengthening leadership capability and strategic impact.

The program targeted high-impact leaders and combined interactive learning with practical workplace application. Key elements included:

- Leadership workshops covering transformational leadership, strategic decision-making, leading through change and team empowerment
- Executive coaching sessions to support individual leadership development
- Practical exercises linked to real business challenges faced within the organization
- Engagement of direct managers to reinforce learning and support the transfer of new leadership practices into teams and day-to-day operations

This blended learning approach monitored leadership development to make certain it was closely connected to real organizational priorities and operational contexts.

Outcomes and Impact

The program successfully graduated its second cohort of elm leaders, strengthening the organization's leadership pipeline and supporting greater alignment between leadership behavior and strategic objectives.

Key outcomes included:

- Stronger leadership awareness and accountability across participating leaders
- Improved ability to lead teams effectively and translate strategic commitments into actionable initiatives
- Enhanced decision-making capabilities in complex and rapidly evolving environments
- High participant engagement and positive feedback on the program's workshops and executive coaching sessions
- The creation of a connected leadership community within elm that continues to collaborate and exchange insight

These outcomes contribute to building leadership capacity capable of supporting elm's long-term growth and digital transformation ambitions.

Next Steps

elm plans to further strengthen the program through:

- Monitoring the implementation of leadership commitments following program completion
- Engaging graduates in strategic leadership initiatives across the organization
- Developing advanced versions of the ELDP program
- Expanding the program to additional leadership segments
- Tracking long-term impact on team effectiveness and organizational performance

Advanced Leadership Development Program

Strengthens senior leaders' strategic thinking, transformation leadership and resilience in complex environments.

High Impact Leadership Program

Develops emerging leaders' capabilities in strategic decision-making, communication and team leadership.

Innovation through Design Thinking

Applies design thinking methodologies to develop innovative, user-centered products and services.

Strategic Leadership

Builds leaders' capabilities in strategic decision-making, innovation management and executive communication.

Master Customer Experience and Innovation

Equips teams with tools to identify customer opportunities and design innovative service experiences.

Emotional Intelligence for Leadership and Collaboration

Enhances self-awareness, relationship management and collaborative leadership effectiveness.

Executive Presence

Strengthens leaders' credibility, influence and confidence in professional communication.

Advanced Business Communication Skills

Improves presentation, cross-cultural communication and negotiation capabilities.

Sustainability and ESG

Introduces ESG principles and practical approaches to integrating sustainability into business strategy.

Mastering Strategic Negotiations

Develops skills to manage complex negotiations and achieve mutually beneficial outcomes.

Training and development for management (hours) in-person

	2025	2024	2023

Innovation and Digital Capability Development

Measuring Training Effectiveness



Talent Development and Retention continued

Enhancing Employee Engagement

SASB TC-SI-330a.2

elm recognizes that an engaged workforce is essential for sustaining productivity, innovation and long-term organizational success. The Company actively monitors and strengthens employee engagement through structured listening mechanisms, leadership enablement and targeted initiatives designed to enhance employee experience and workplace culture.

Employee Feedback and Insights

Employee engagement at elm is monitored through regular Employee Experience Surveys, pulse checks and ongoing feedback channels that capture employees' perspectives on their workplace experience and organizational culture.

In 2025, elm began by analyzing the results of the employee engagement survey conducted at the end of 2024 to identify priority areas for improvement. Departments participated in structured working sessions to review survey insights, identify lower-performing indicators and develop tailored action plans to meet their operational needs. To track progress and confirm the effectiveness of these actions, a mid-year pulse check was introduced, enabling departments to reassess outcomes and refine engagement initiatives where needed.

Employees are also encouraged to share ideas, concerns and feedback through multiple channels such as Employee Voice, Maak, and Report to Us, alongside internal dialogue platforms that promote open communication between employees and leadership.

Promoting Recognition and Employee Appreciation

Survey insight highlighted opportunities to strengthen recognition and appreciation practices across the organization. In response, elm launched a focused engagement campaign aimed at improve recognition practices at all levels.

As part of this initiative, the Company introduced a Leader Recognition Guide, a practical toolkit designed to help managers effectively recognize employee contributions and foster a stronger culture of appreciation within their teams. The guide outlines available recognition tools and was distributed across the organization with supporting awareness communications.

Managers also play an active role in engagement by facilitating discussions with their teams, reviewing engagement insight and supporting the implementation of departmental action plans that enhance employee experience.

Fostering a Positive Workplace Culture

Beyond engagement campaigns, elm promotes a collaborative and inclusive workplace environment through initiatives that increase team connection and organizational culture. These activities encourage dialogue, recognition and employee participation across the workforce.

Key engagement initiatives include the following initiatives.

- **Annual ceremony for "elmers" –** An annual event that celebrates employees' achievements and recognizes long-serving staff for their contributions to the organization
- **Morning coffee –** Periodic gatherings that provide employees with direct access to the CEO to discuss updates and organizational developments
- **Competitive sports events –** Activities such as football, padel and electronic games that foster teamwork and a healthy competitive spirit across the workforce
- **Celebrating national occasions –** Events that highlight important national milestones and cultural values shared by employees
- **Junior elmawy Day –** A family engagement initiative where employees' children visit the workplace and participate in interactive activities

Through continuous listening, leadership engagement and targeted initiatives, elm reinforces a people-centric culture that enables employees to contribute meaningfully to the organization's growth and the Kingdom's broader digital transformation ambitions.

HR Committee Oversight

Employee engagement initiatives are supported by elm's HR Committee, which operates independently from the Human Capital division and reports directly to the CEO. The Committee oversees major employee engagement activities, manages employee voice platforms and helps ensure fairness and transparency in workplace initiatives. Committee members are selected through annual employee elections, reinforcing participation and inclusion in organizational culture.



At elm, employee health, safety and well-being are integral to maintaining a resilient and high-performing workforce. The Company's Health and Safety Policy establishes clear responsibilities, procedures and controls for a safe working environment across all facilities, in line with national occupational health and safety regulations.

Health and safety

	2025	2024	2023

Comprehensive Benefits and Well-being Framework

Health and Physical Well-being

Financial Well-being

Career Well-being

Social Well-being

Promoting Work-Life Balance

Parental Leave Support

Parental leave

	2025	2024	2023



Diversity, Equity and Inclusion

GRI 2-7, 401-1, 405-1
SASB TC-SI-330a.3

elm recognizes that diversity in gender, age and ability strengthens organizational performance by broadening perspectives, improving decision-making quality and enhancing innovation capacity. As a digital enterprise serving diverse stakeholders, workforce diversity plays a critical role in strengthening organizational resilience, competitiveness and social alignment.

Workforce diversity indicators are monitored through human capital metrics such as workforce demographics, leadership pipeline readiness, training effectiveness and employee engagement, enabling leadership to guide initiatives that bolster representation and inclusion across the organization.

By fostering an equitable workplace where employees feel valued, respected and empowered, elm increases engagement, retention and long-term capability development, directly supporting its digital transformation mandate.

Workforce data for 2025 as detailed below reflects continued strengthening of elm's human capital base alongside improvements in workforce stability and leadership capacity.

The number of full-time employees increased from 2,064 in 2024 to 2,167 in 2025, supporting the Company's expanding operational footprint and digital service delivery. At the same time, employee turnover improved significantly, declining from 10.5% in 2024 to 8.3% in 2025, indicating stronger retention and workforce engagement.

Leadership depth also expanded during the year, with senior management positions increasing from 109 to 117 and middle management roles rising from 253 to 672, reflecting consistent investment in leadership development and internal capability building. Together, these trends demonstrate elm's continued focus on building a stable, skilled and future-ready workforce to support long-term organizational growth.



Key performance indicator

	2025	2024	2023
Full-time employees	**2,167**	2,064	1,705
Full-time male employees	**1,677**	1,610	1,390
Full-time female employees	**490**	454	315
Percentage male	**77.4%**	78%	81.5%
Percentage female	**22.6%**	22%	18.5%
Total new joiners	**272**	399	348
New male joiners	**201**	268	232
New female joiners	**71**	131	116
Total number of employees who left the organization	**179**	217	131
Turnover rate (%)*	**8.3%**	10.5%	7.7%
Male employees who left the organization	**106**	181	108
Female employees who left the organization	**73**	36	23

*Turnover rate is calculated based on average headcount

Key performance indicator

	2025	2024	2023
Senior management	**117**	109	159
Male in senior management	**113**	106	158
Female in senior management	**4**	3	1
Middle management	**672**	253	445
Male in middle management	**586**	242	426
Female in middle management	**86**	11	19
Staff	**1,378**	1,702	1,101
Male staff	**978**	1,262	806
Female staff	**400**	440	295

Employees by age

	2025	2024	2023
18-30	**856**	827	614
31-50	**1,266**	1,203	1,047
50+	**45**	34	44

Diversity, Equity and Inclusion continued

Women Empowerment

elm is committed to strengthening gender diversity and increasing female representation across its workforce, particularly within the technology sector.

elm focuses on attracting, retaining and developing female talent through targeted initiatives. In 2025, total female headcount increased to 490 employees, representing 22.6% of the workforce, compared to 22.0% in 2024. This consistent improvement reflects elm's sustained efforts to strengthen female participation and advance gender diversity across its workforce.

Female representation

	2025	2024	2023
Female employees	**490**	454	315
Female workforce percentage	**22.6%**	22.0%	18.5%
Female new joiners	**71**	131	116

Female representation in leadership positions continued to strengthen in 2025, reflecting elm's ongoing efforts to expand opportunities for women across management levels. The number of women in senior management increased to four in 2025, while female representation in middle management rose significantly from 11 to 86 roles, indicating strong progress in developing the female leadership pipeline and supporting women's advancement into managerial positions.

Female management roles

	2025	2024	2023
Female in senior management	**4**	3	1
Female in middle management	**86**	11	19

elm continued to invest in the professional development of its female workforce in 2025, significantly expanding training participation and learning opportunities. Total training hours for female employees doubled in comparison to the previous year indicating elm's continued commitment to strengthening female capability development.

Training and development by gender in-person

	2025	2024	2023
Total hours of training for female employees	**25,976**	11,392	1,624
Number of female training beneficiaries	**450**	220	58
Average hours per female employee	**57.72**	51.78	28
Total hours of training for male employees	**66,848**	50,960	11,560
Number of male training beneficiaries	**1,346**	1,164	406
Average hours per male employee	**49.66**	43.78	28.47

Case Study

Pregnant Employees Experience Study

Objective

In 2025, elm initiated a focused study to better understand the experience of pregnant employees. The initiative was launched following feedback shared directly with the CEO, highlighting the Company's commitment to listening and responding with intent. The objective was to assess employees' experiences, identify any challenges faced during pregnancy, and develop actions to make the workplace more supportive and suitable for pregnant employees.

Approach

The Human Capital team conducted a structured assessment to understand the experience of pregnant employees across areas such as the work environment, managerial support and operational flexibility. Feedback was collected to identify key challenges and needs, and findings were benchmarked against global best practices. Based on this insight, a comprehensive action plan was developed and coordinated with relevant departments to support implementation.

Outcome

The study provided a clear understanding of pregnant employees' experiences and identified key areas for improvement. A detailed report was produced, including survey findings and a comprehensive action plan. Practical actions were developed in coordination with relevant teams to enhance the work environment and overall employee experience. The initiative also received strong leadership attention, reinforcing elm's commitment to employee well-being and supportive workplace practices.

Next Steps

elm remains committed to working with relevant departments to implement the action plan and track progress to make sure improvements are delivered as planned. Ongoing monitoring and feedback will help identify emerging needs and support continuous improvements to the workplace experience of pregnant employees.

When I receive a detailed report with survey results and an action plan about our pregnant colleagues and how suitable the work environment is, it shows real care. This care will also reflect in how we serve our customers. Thank you for keeping this unique spirit.

CEO Message (Dewan)

Diversity, Equity and Inclusion continued

Saudi Talent Development

National talent development remains central to elm's mandate and its contribution to Saudi Vision 2030. In 2025, the number of full-time national employees increased to 1,882, reflecting elm's continued commitment to improving local talent participation across its operations.

Through targeted initiatives focused on structured training, early-career development and leadership pipelines, elm nurtures Saudi talent and supports the localization of digital capabilities. These efforts contribute to building a future-ready workforce while ensuring knowledge retention and the sustained development of national expertise in the Kingdom's growing digital economy.

Workforce by nationality

	2025	2024	2023
Number of full-time national employees	**1,882**	1,777	1,381
Female national employees	**490**	454	314
Male national employees	**1,392**	1,323	1,067
National full-time employees in senior management	**107**	97	125
Number of employees of other nationalities	**285**	287	324

Disability Inclusion

elm views disability inclusion as an essential dimension of equitable employment. A dedicated strategic project was launched in 2025 to enhance workplace integration and accessibility. Employment of people with disabilities is embedded within national priorities and monitored accordingly.

Looking close at this commitment, elm significantly increased the number of employees with disabilities to 23 in 2025, compared to two employees in 2024. This progress demonstrates elm's efforts to create meaningful employment opportunities, fostering an inclusive environment that values diverse perspectives and capabilities.

In recognition of its progress, elm received the Gold Level Mowaamah Certification, an initiative by the Ministry of Human Resources and Social Development that assesses organizations' performance in creating inclusive workplaces.

All employees with disabilities receive equal rights and benefits in accordance with Saudi Labor Law and internal governance policies. Workplace accommodation is provided to safeguard accessibility and performance parity.

Employees with disabilities

	2025	2024	2023
Number of employees with disabilities	**23**	2	2

Community Development and Digital Inclusion

elm's approach to community development is grounded in the belief that digital innovation should translate into meaningful social value. As a national digital enabler, elm contributes to reinforcing the broader ecosystem by supporting national talent development, expanding access to digital services and fostering partnerships that enhance social inclusion and community well-being.

In 2025, elm continued to advance people-centered priorities, including empowering national talent, fostering a culture of belonging and integrating social responsibility into its corporate identity. These priorities are reflected in initiatives that support education, technological empowerment and community engagement across the Kingdom.

Through these efforts, elm contributes to advancing Saudi Arabia's Vision 2030 priorities, particularly human capability development and accelerating the Kingdom's digital transformation.



Community Investment

GRI 413-1

elm is committed to playing an active and responsible role in assisting the communities in which it operates, in line with its social responsibility policy, which is described in further detail in the Key policies section of this report. As a leading digital solutions company, elm seeks to strengthen community well-being by expanding access to digital services, supporting national talent development and fostering partnerships that contribute to inclusive and sustainable development.

In 2025, elm invested ﷼ 2 million in charitable contributions, reflecting steady growth in structured community engagement.

	2025	2024	2023
Amount in charitable contributions (﷼ million)	**2.00**	1.50	1.15

Community initiatives during the year focused on education, technological empowerment, cultural sustainability and social inclusion, indicating elm's commitment to creating long-term positive impact and supporting national development priorities.

Key initiative included:

- Memorandum of Understanding with Prince Muqrin University, aimed at strengthening technological infrastructure, promoting innovation and applied research, and equipping students with digital skills aligned with labor market requirements.
- Memorandum of Understanding with the King Salman Center for Disability Research, focused on developing AI-based digital solutions that improve accessibility and quality of life for people with disabilities, advancing joint research, knowledge exchange and innovation in assistive technologies.
- Main sponsorship of the International Handicrafts Week "Banan", one of the Kingdom's largest gatherings of artisans organized by the Saudi Heritage Authority, supporting hundreds of craftsmen and associations, and promoting national cultural industries.
- "Jood – elm employees" initiative, an internal campaign encouraging employees to participate in charitable giving through the national Jood Housing platform, strengthening employee engagement in community initiatives.

elm's efforts were recognized through the 2025 Corporate Social Responsibility Award (Silver Category) Ministry of Human Resources and Social Development, acknowledging the Company's structured approach to social responsibility and its contributions to sustainable development and community initiatives.

National Talent Pipeline Development

Community development at elm is closely linked to the development of national digital talent and future workforce capabilities. The Company actively contributes to building Saudi Arabia's future workforce by supporting education, skills development and early-career opportunities aligned with the Kingdom's digital transformation agenda.

Human capital initiatives support community engagement through COOP placements, university partnerships and youth development initiatives. These structured programs make certain that social investment contributes directly to workforce resilience, digital capability development and national human capital growth.

Cooperative Training Program (COOP)

The COOP program provides university students with practical work experience through structured training opportunities at elm. The program allows students to apply academic knowledge in a professional environment while gaining exposure to real projects and creating potential pathways for future full-time roles at elm.



Community Development and Digital Inclusion continued

Trainee participation in COOP

	2025	2024	2023
Total number of trainee participants	**178**	134	176
Female participants	**93**	64	97
Male participants	**85**	70	79

elm regularly engages with young talent through career fairs, recruitment initiatives and university outreach activities, boosting its role in promoting employment opportunities and positioning elm as an employer of choice within the Kingdom's growing digital economy.

Trainee participation increased in 2025, with balanced gender representation. These partnerships leverage academic research capacity alongside elm's digital expertise to accelerate digital transformation in the education sector.

Together, these initiatives build a sustainable pipeline of national talent capable of supporting Saudi Arabia's long-term innovation, workforce development and economic diversification goals.

Digital Inclusion and Access

GRI 203-1, 203-2

Beyond financial contributions and training programs, elm's most significant societal impact stems from the digital platforms and public-sector solutions it develops and operates. By digitizing government services and enabling paperless, automated workflows, elm reduces physical travel requirements, lowers carbon emissions and expands equitable access to services.

Digital inclusion is embedded within elm's solution design and development processes, ensuring that services remain accessible to diverse user groups, including elderly users, People of Determination and multilingual audiences. elm follows the Digital Government Authority (DGA) Platforms Code, the Kingdom's national framework for digital government services, which provides standardized design, usability and accessibility guidelines for public-sector platforms. These standards are complemented by compliance with WCAG 2.1 Level AA accessibility requirements, making sure accessibility and usability are integrated throughout the digital service lifecycle.

To monitor that accessibility is systematically integrated into digital services, elm applies a multi-layered framework of standards and principles so that services remain inclusive by design. This framework is structured around the internationally recognized POUR principles.

Perceivable: Information and interface elements are designed so users can easily perceive content across different formats and devices.

Operable: Interfaces are designed to remain accessible through multiple interaction methods, including assistive technologies.

Understandable: Clear language and intuitive workflows help users complete services easily.

Robust: Systems are developed to remain compatible with current and future technologies, ensuring long-term accessibility.

These principles are translated into practical accessibility features integrated across elm's digital platforms, including:

- Native Arabic-first, right-to-left (RTL) interface design with multilingual capabilities
- High-contrast display modes, dyslexia-friendly fonts and adjustable text scaling
- Compatibility with assistive technologies, including screen readers such as NVDA and VoiceOver
- Keyboard-only navigation to support users with limited mobility
- Simplified plain-language workflows that reduce cognitive barriers for users with varying digital literacy levels

These practices are supported by the Digital Government Authority's National Design System, which standardizes interfaces across government platforms and improves usability and familiarity for citizens and residents accessing digital services.

elm's digital platforms support economic participation, knowledge access and community engagement by enabling inclusive digital services for citizens, businesses and communities. Several of these platforms demonstrate how elm's digital capabilities translate into measurable social and economic impact.

Enabling Inclusive Digital Platforms

elm's digital platforms support economic participation, knowledge accessibility and community engagement by enabling efficient and inclusive digital services for citizens, businesses and communities.

Estrdad Platform – Supporting Small and Medium Enterprises

The Estrdad platform, developed for the General Authority for Small and Medium Enterprises (Monsha'at), serves more than 350,000 SMEs across the Kingdom by digitizing the government-fee refund journey.

The platform provides three core digital services covering application submission, eligibility verification and disbursement, enabling a fully automated process that reduces manual intervention and improves operational transparency. An AI-driven eligibility engine supports accurate assessment of applications while ensuring fairness and consistency in refund processing.

By accelerating refund cycles and simplifying procedures, Estrdad improves cash-flow sustainability for SMEs and supports broader national efforts to strengthen SME participation in the Saudi economy.

Minhaj Platform – Expanding Access to Digital Knowledge

The Minhaj platform provides a unified digital ecosystem delivering educational, Islamic and charitable services through a web portal and mobile application.

Within the first 20 days of launch, the platform reached over 30,000 daily users and it now serves users in more than 80 countries. Minhaaj offers over 25 digital services, providing global access to trusted digital content and resources.

The platform has also received official endorsement from the Islamic Fiqh Academy, strengthening its credibility and supporting broader access to reliable Islamic knowledge through an integrated digital environment.

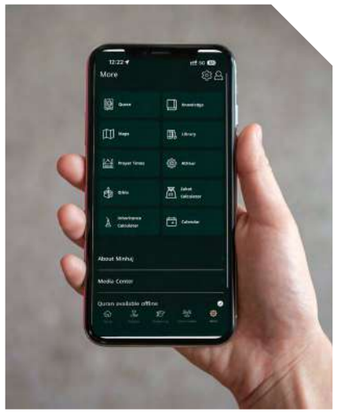
Hawi Platform – Enabling Community Participation

The Hawi platform supports community engagement by digitally connecting hobby communities across Saudi Arabia.

The platform currently engages more than 100,000 active members and supports the management of 3,200 hobby clubs nationwide, covering more than 230 different hobbies. By digitally unifying hobby communities through a single platform, Hawi enables enthusiasts to organize activities, share interests and strengthen community participation.

The platform has achieved a 100% user satisfaction rating, reflecting strong user engagement and its role in supporting social participation and community interaction.







Community Development and Digital Inclusion continued

Supply Chain and Local Content

GRI 204-1

elm recognizes the vital role its supply chain plays in supporting sustainable business practices, ethical conduct and national economic development. The Company's procurement activities are guided by a comprehensive set of internal policies such as the Terms and Conditions of Business, Purchasing and Contracting Policy, Local Content in Procurement Policy, Code of Conduct, Conflict of Interest Policy and Work Environment Policy, which all meet applicable Saudi laws and regulations.

These policies establish clear expectations for suppliers regarding ethical conduct, compliance with labor regulations, fair treatment of workers and safe working conditions. elm's Code of Conduct extends to suppliers, requiring them to uphold internationally recognized human rights standards and maintain responsible workplace practices.

Supplier compliance is supported through ongoing monitoring and periodic audits conducted by the Internal Audit division. In cases of non-compliance, elm implements structured procedures, including corrective action plans, follow-up audits and, where necessary, termination of supplier relationships. Suppliers also have access to a dedicated channel on elm's website to report complaints or ethical concerns, guaranteeing transparency and accountability across the supply chain.

Beyond compliance, elm actively promotes collaboration and engagement with suppliers to strengthen supply chain resilience and consistent improvement. The Vendor Management team regularly organizes initiatives to enhance communication and partnership with suppliers, including Vendor Day events, supplier satisfaction surveys and the annual Vendor Summit, which provide platforms for dialogue, training and onboarding.

Local Content and National Economic Contribution

elm remains actively committed to the Local Content Concept championed by the Local Content and Government Procurement Authority (LCGPA). Through its Local Content Enforcement Policy, elm supports the development of national capabilities, promotes job creation and contributes to Saudi Arabia's economic diversification goals under Vision 2030.

In 2025, elm continued strengthening support for local small and medium-sized enterprises (SME) through procurement practices that apply a 10% preference for SME suppliers during evaluation processes, expanding opportunities for Saudi businesses within the Company's supply chain.

Supply chain management and audits

	2025	2024	2023
Total number of suppliers	**3,522**	792	1,508
Total number of local suppliers	**2,514**	531	1,103
Percentage of local suppliers (%)	**71.4%**	67.0%	73.1%
Spend on suppliers (﷼ million)	**4,594**	2,980	2,870
Spend on local suppliers (﷼ million)	**4,434**	2,834	2,785
Spend on local suppliers (%)	**96.5%**	95.1%	97.0%

elm continued to prioritize local sourcing in 2025, with 71.4% of suppliers classified as local and 96.5% of total procurement spend directed to local suppliers. This sustained level of localization reflects elm's strong commitment to supporting Saudi businesses and expanding the national supplier ecosystem.

The Company's local content performance has continued to improve in recent years, increasing from 67.1% in 2023 to 70.4% in 2024, highlighting elm's contribution to national capability development and economic diversification.

Local content

	2024	2023
Local content percentage	70.4%	67.1%

*The score for 2025 will be released in 2026

Through responsible sourcing practices, strong supplier engagement and an ongoing focus on local content development, elm aims to strengthen the resilience of its supply chain, contributing to Saudi Arabia's long-term economic growth and Vision 2030 objective.

Building on the progress achieved in 2025, elm will continue strengthening its human capital architecture, inclusion agenda and community impact model to ensure long-term workforce resilience and national contribution.



Digital Excellence and Experience

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Looking Ahead	114

623,597

First-call resolutions

10,224

AI-related training hours



> **elm accelerated its transition from digitalization toward intelligent governance by embedding advanced technologies, standardized delivery frameworks and responsible data practices across platforms.**

Overview

For elm, digital excellence is more than a functional capability; it is the core of value creation. As a national digital enabler developing critical government and business platforms, elm's financial sustainability, stakeholder trust and impact depend directly on the reliability, scalability and governance of its digital ecosystems.

Platform performance plays a critical role in maintaining revenue stability, while the integration of AI drives productivity and accelerates innovation. Strong, structured delivery governance helps reduce both operational and reputational risks, ensuring consistent execution. At the same time, customer experience metrics are key to building and sustaining long-term partnerships. Underpinning all of this is digital trust, which supports regulatory alignment and reinforces public confidence.

Digital excellence therefore supports:

- Sustainable revenue growth through scalable platforms
- Operational resilience via modular, cloud-ready architectures
- Cost efficiency through automation and intelligent development
- National digital transformation and Quality of Life objectives
- Long-term competitive advantage through disciplined innovation

In 2025, elm strengthened its digital architecture across innovation, governance, intelligent automation and customer-centric performance, reinforcing its role as a trusted national partner in digital transformation.



2025 Highlights

During 2025, elm delivered measurable advancements across its digital ecosystem.

﷼ 9.5 million invested in innovation and **﷼ 44.9 million** in research, sustaining long-term platform capability development

100+ unified services delivered through the Ajwaa platform

350,000+ SMEs supported via Estrdad platform automated refund system

92% complaint resolution rate, despite increased service volumes

~60,000 users served across key products and projects

93% average CSAT across major platforms

3,200 hobby clubs and over **100,000** members integrated under Hawi platform microservices-based architecture

Launch of the **Sanam program** an initiative designed to address real challenges faced by beneficiaries across various sectors. By developing a deeper understanding of customer, the program aims to create effective solutions and enhance business sustainability.

AI embedded across the software development lifecycle to improve delivery speed and quality

Beyond operational metrics, elm's digital services also contribute to broader sustainability outcomes. By digitizing government services and reducing reliance on paper documentation and physical visits to service centers, elm's platforms support resource efficiency, reduced transport emissions and improved accessibility for citizens and businesses across the Kingdom.

Digital Transformation and Innovation

Innovation is central to elm's strategy for sustaining digital leadership and delivering scalable solutions that address national priorities and evolving customer needs. The Innovation department works across all business units to enable a creative environment through identifying emerging opportunities and transforming complex operational challenges into practical digital solutions.

Its mission is to cultivate a culture of experimentation and continuous improvement while translating ideas into scalable digital services and platforms. To ensure consistency and quality across initiatives, a DGA-approved (Digital Government Authority) design system is embedded across the project lifecycle.

To structure this process, elm developed the Innovation Pyramid, the Company's institutional innovation model. The model has evolved over the years through experimentation and operational learning to provide a dynamic framework that can be adopted across organizations seeking to build comprehensive capabilities.

elm's Innovation Pyramid



The pyramid illustrates a structured pathway for developing and scaling innovation. At its base lies the innovation strategy, which provides a clear vision and establishes incentives to guide innovation priorities across the organization. Supporting this is an innovation culture that fosters curiosity, encourages experimentation and creates psychologically safe environments where employees feel empowered to explore new ideas.

Building on this foundation, elm focuses on developing innovators by equipping employees with the knowledge, skills and tools needed to apply creative thinking to real business challenges.

The next layer emphasizes idea generation and solution discovery, where teams identify unmet needs, analyse challenges and generate potential solutions. These ideas then move into validation and growth acceleration, involving experimentation, prototyping and feasibility assessments to evaluate their viability.

Promising ideas progress to product and service development, where solutions are engineered, refined and delivered to end users. The pyramid culminates in customer satisfaction, ensuring that innovations translate into meaningful value for both users and stakeholders.

Throughout all stages, continuous measurement and improvement track innovation performance, enabling ongoing refinement and long-term impact.

Innovation through R&D

Innovation at elm is driven by a structured research and development approach that translates emerging technologies into scalable, market-ready solutions. The Company prioritizes applied research that responds to evolving market demands while supporting national priorities and global sustainability objectives.

Continuous monitoring of global technology trends enables elm to identify high-potential opportunities and convert them into practical digital solutions. Research activities are guided by leading practices that enable collaboration, knowledge exchange and accountability, strengthening overall innovation outcomes. This approach is further supported through engagement with industry forums, collaboration with academic and technology institutions, and contributions to intellectual property and research publications.

Strategy

The Research and AI function is guided by a strategic direction that supports elm's overarching business goals, with an emphasis on the following.

AI-centric Innovation
Leveraging AI to enhance processes, capabilities and explore new avenues for innovation.

Business Focus: Market-Driven Outcomes
Emphasizing research initiatives while ensuring alignment with market needs.

Global Partnerships
Strengthening collaborations with academic institutions and technology partners worldwide.

Core Values and Ethics
Embedding ethical principles and values at the heart of all activities.

Digital Transformation and Innovation continued

Key Areas of Technological Innovation

elm prioritizes several technological areas that deliver significant ESG impact, including the following.

Generative AI and Foundation Models

Large-scale foundation models applied to digital twins, digital mapping and autonomous agents, enabling simulation-based planning, monitoring and energy-efficient operations.

Vertical AI

Specialized platforms supporting smart governance, including smart cities, judicial systems and citizen services, optimizing institutional operations.

Vision Large Language Model (LLM) Techniques

Uses LLMs for vision tasks to support predictive analysis of environmental, social and governance trends.

Multi-dialect Arabic Command Recognition

AI models that understand regional Arabic dialects across multiple domains, enhancing accessibility and social service delivery.

3D Image Generation and Scene Reconstruction

Multi-sensor AI technology accurately maps complex environments, including urban areas, construction sites and buildings, supporting operational planning and resource efficiency.

AI Edge Hardware

Edge computing devices designed to minimize energy use, extend battery life and reduce hardware turnover by executing high-power processes only when necessary.

Mobile Robotics

Autonomous ground and aerial robots, including hospitality robots, that respond to gestures and voice commands, improve efficiency and enhance human interaction while supporting sustainability.

Autonomous Driving Software

Driverless vehicle platforms powered by electric batteries, optimizing routing and traffic predictions to reduce energy consumption and environmental impact.

E-Paper Card

Reusable, energy-efficient cards designed to replace single-use physical cards, reducing material waste and supporting long lifecycle, low-energy applications such as premises access.

Human-in-the-Loop and Interactive Natural Language Processing (NLP)

Computer vision and NLP models designed for social services, interpreting behavior and expressions, supporting adaptive learning, disaster management and accessibility for people with disabilities.

Digital Transformation and Innovation continued

Innovation Programs and Capability Development

To operationalize the innovation framework, elm has developed a portfolio of innovation programs and platforms designed to nurture creativity, test ideas and accelerate product development.

These initiatives include the following.

Idea and Challenge Bank

A collaborative platform enabling employees to submit ideas and identify operational challenges faced by both internal teams and external clients. Integrated with an AI agent, the platform helps refine and strengthen ideas before submission by analyzing concepts and benchmarking against local and global solutions to identify gaps or improvement opportunities. This ensures higher-quality data-driven ideas and enables a proactive, sustainable culture of innovation.

Innovation Capability and Culture Programs

Programs focused on enhancing internal innovation skills and embedding a culture of creativity and continuous improvement:

- **Internal investigative research**

Structured research projects exploring operational challenges, employee behaviours and system interactions to identify opportunities for improvement.

- **Innovation pioneers program**

An integrated training program designed to build innovation mindsets and equip employees with practical skills to address real organizational challenges.

- **Innovation culture initiatives**

Programs aimed at building a psychologically safe environment where experimentation and creative thinking are encouraged.

- **Innovation scale assessment**

A maturity assessment tool used to measure the development of elm's innovation culture and capability across the organization.

Sustainable Innovation Program (Sanam)

Through the Sanam program, elm identifies development and innovation opportunities that directly address real-world challenges faced by beneficiaries across various sectors, with the aim of transforming these challenges into scalable digital products.

The program adopts a user-centred approach to gain a deeper understanding of end users' needs and behaviors through field visits, in-depth interviews, observations and data analysis. These insights support the development of sustainable solutions grounded in a comprehensive understanding of users, beneficiaries and their behavioral patterns.

Together, these initiatives strengthen elm's institutional innovation capability and make certain that experimentation translates into tangible digital solutions.



Driving Measurable Platform Impact

During 2025, elm launched and enhanced several high-impact digital ecosystems.

Ajwaa Platform (GACA)

The Ajwaa Digital Platform, developed with the General Authority of Civil Aviation, introduced advanced digital solutions to improve operational efficiency across the aviation sector. End-to-end automation reduced manual intervention, accelerated processing times and introduced real-time dashboards to enhance transparency and governance oversight.

100+
unified digital services delivered

12,000+
beneficiaries served

Estrdad Platform (Monsha'at)

The General Authority for Small and Medium Enterprises (Monsha'at) launched the second edition of the Government Fee Refund initiative, Estrdad, to streamline fee refunds for SMEs. The platform fully automates refunds using an AI-driven eligibility engine, improving refund speed, strengthening SME liquidity and boosting economic participation within the national ecosystem.

350,000+
SMEs supported through fully automated fee refunds

Hawi Platform

Designed as an integrated hobby ecosystem platform with mobile applications, Hawi unifies clubs and members across the Kingdom while addressing technical challenges and enhancing sustainability. Rebuilt with a microservices-based architecture, it improves performance efficiency through API standardization and redesigned interfaces.

3,200
clubs connected across the Kingdom

100,000+
active members

100%
user satisfaction rating

Minhaaj Platform

Developed in collaboration with the Muslim World League, the Minhaaj application promotes religious and cultural knowledge exchange through a globally accessible digital ecosystem, delivering a wide range of digital services and demonstrating elm's ability to scale culturally aligned digital ecosystems internationally.

30,000+
daily users within 20 days of launch

25+
digital services delivered

80+
countries reached

Collectively, these platforms enhance service accessibility and operational resilience while advancing sustainability and quality of life objectives under Vision 2030.

Digital Transformation and Innovation continued

Case Study

Employee-driven **Innovation**

elm believes that innovation thrives when employees are empowered to identify opportunities, tackle challenges and co-create solutions. Employee-driven initiatives not only enhance customer experiences and operational efficiency, but also enable collaboration across divisions and support elm's broader strategic objectives, including digital transformation and alignment with Saudi Vision 2030.

Idea Evaluation Methodology

elm's internal hackathons follow a structured methodology designed to maximize innovation while ensuring alignment with strategic goals:

Challenge definition: Strategic priorities are translated into specific innovation challenges.

Team formation: Cross-functional teams of elm employees are formed to encourage collaboration and knowledge sharing.

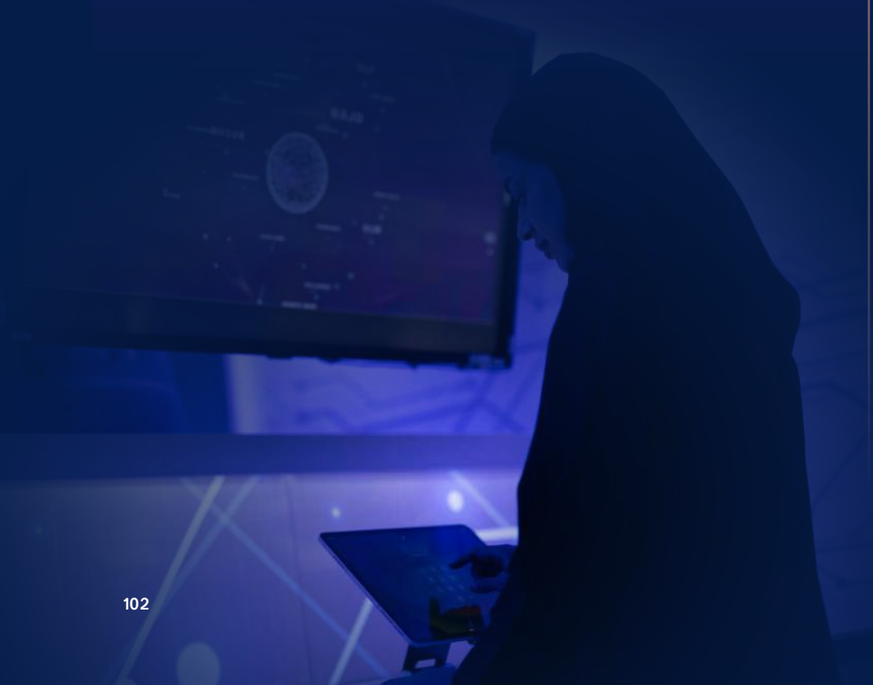
Solution development: Teams develop prototypes and solutions over a six to eight-week cycle, supported by mentorship, advisory sessions and progress reviews.

Evaluation: Solutions are assessed for:

- Technical feasibility
- Strategic alignment
- Innovation and creativity
- Potential impact and scalability

Recognition and adoption: High-potential solutions are recognized and selected ideas are adopted for implementation.

This methodology provides a consistent framework, accelerates ideation-to-implementation and ensures that employee contributions are aligned with elm's strategic and sustainability objectives.



Agri Hackathon (Agricultural Innovation Hackathon)

The Agri Hackathon (Agricultural Innovation Hackathon) addressed critical agricultural challenges, including productivity, sustainability, food security and resource management, while leveraging elm employees' expertise to develop high-impact, actionable solutions by focusing on real-world sectoral challenges.

Results

70+
employees participated, forming 19 cross-functional teams

8
ideas passed evaluation, with four officially adopted for development

Delivered strategic value by:

- Enhancing collaboration across departments
- Aligning with key stakeholders
- Identifying new revenue opportunities

Ameelthon

Ameelthon enhanced customer experience by identifying friction points in digital services and embedding a customer-first mindset. The initiative focused on improving operational efficiency and user satisfaction while reinforcing a culture of creativity and cross-departmental collaboration, transforming employee ideas into practical, actionable solutions aligned with elm's strategic priorities.

Results

137
participants formed 34 teams addressing diverse challenges across the customer journey

3
ideas adopted for development, improving service efficiency and customer satisfaction

Strengthened organizational culture, fostering creativity, teamwork and long-term value creation

elm AI Hackathon

The AI Hackathon embedded artificial intelligence into operational workflows by moving AI from experimental concepts to practical, value-driven applications across elm departments. It fostered a competitive yet collaborative environment, accelerating AI adoption, enhancing operational efficiency and strengthening internal AI capabilities aligned with elm's long-term digital transformation vision.

Results

260+
participants formed 54 cross-functional teams, generating AI prototypes in automation, predictive analytics and decision support

10
winning ideas adopted for further development, demonstrating practical integration into operations

Enhanced readiness for AI-enabled operations and strategic transformation

Employee Ideation Workshop in Hajj and Umrah Division

During Ramadan 1446 AH, elm organized a dedicated ideation workshop in Makkah, which generated over 30 potential solutions across four key challenge areas. The initiative reflected elm's commitments to fostering a work environment that encourages innovation and transforms employee-generated ideas into impactful solutions that contribute to enhancing customer experience, addressing user pain points and supporting the Company's strategic objectives, encouraging cross-divisional collaboration and knowledge sharing.

Results

In 2025, elm successfully adopted four employee-generated ideas, with two implemented:

- Fatwa Smart Agent – an AI-powered tool providing timely responses to common Hajj and Umrah inquiries
- Mutamer Without Luggage – a service allowing Umrah performers to bypass airport luggage collection, enhancing convenience and travel experience

Digital Transformation and Innovation continued

Sustainable Impact

Digital Sustainability Impact

Beyond service efficiency, elm's platforms contribute directly to environmental sustainability. By digitizing governmental services:

Physical visits to ministries and service centers are reduced.

Fuel consumption and urban congestion are lowered.

Carbon emissions associated with transportation decline.

Paper consumption and physical documentation are minimized.

Through paperless workflows, digital signatures and automated processes, elm supports resource conservation while improving processing efficiency. Digital transformation at scale therefore supports both environmental stewardship and national infrastructure optimization.

ESG-aligned Innovation Initiatives

elm continues to explore innovation opportunities that support broader sustainability and national development objectives. Several ESG-aligned initiatives are currently under development across digital governance, sustainability and social impact.

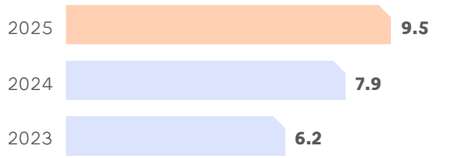
Initiative	Objective
3D Digital Twin	3D simulation that helps optimize urban energy consumption, enhance workplace safety and support smart city planning.
Legal AI	AI platform designed to improve efficiency and accuracy in legal proceedings.
Smart Assistant	AI-driven interactive robot operating 24/7, providing government services to customers without human intervention.
Arabic Speech Emotion Detection	System for analyzing Arabic speech and voice, tailored for Arabic call centers, converting audio into informative text to extract valuable insight from customer interactions and market dynamics, supporting Modern Standard Arabic and local dialects.

Investment in Digital Capability

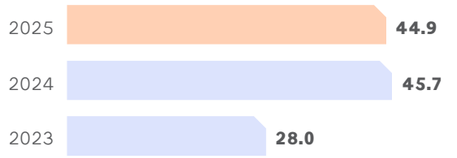
In 2025, elm accelerated its transition from digitalization toward intelligent governance by embedding advanced technologies, standardized delivery frameworks and responsible data practices across platforms.

Innovation investment has increased year-on-year, reinforcing elm's commitment to continuous product enhancement and AI integration. Research investment remained elevated compared to historical levels, reflecting long-term capability development rather than reactive platform iteration. These investments strengthen scalability, modularization and resilience across government and business ecosystems.

Investment in innovation (兆 million)



Investment in research (兆 million)



Strategic Partnerships

elm collaborates with leading academic institutions, research centers and industry partners to strengthen technology capabilities and accelerate innovation across the digital ecosystems.

Partnerships support:

- AI research and advanced analytics development
- Technology talent development
- Joint innovation initiatives
- Academic collaboration on emerging technologies

Key partners

Industrial

أصول OSOOL
hyperview
TIER IV
jeeny
FOUNDATION AUTOMOTIVE OF WICHITA FALLS
Intersect

Academic

KACST مدينة الملك عبدالعزيز للعلوم والتقنية
جامعة الأميرة نورة بنت عبدالرحمن Princess Nourah Bint Abdulrahman University
University of BRISTOL
Imperial College London
NANYANG TECHNOLOGICAL UNIVERSITY SINGAPORE
جامعة اليمامة Al Yamamah University
جامعة الإمام محمد بن سعود الإسلامية IMAM MUHAMMAD IBN SAUD ISLAMIC UNIVERSITY
جامعة دار الحكمة DAR AL-HEKMA UNIVERSITY

Responsible AI

As artificial intelligence (AI) becomes increasingly embedded within elm's platforms and operations, the Company has established a structured governance approach to ensure AI development and deployment remain ethical, secure and aligned with national priorities.

AI governance at elm is anchored within the AI Enablement Office, which leads the execution of the Company's AI strategy and oversees the responsible deployment of AI capabilities across infrastructure, products and services. Strategic initiatives and roadmap execution are reviewed monthly at management level and quarterly at Board level, reinforcing strong executive oversight and accountability.

Rather than treating AI as a standalone innovation stream, elm integrates AI governance within its broader technology governance framework. Cybersecurity, privacy, data governance and model risk management policies collectively ensure that AI systems are developed and deployed in accordance with internal standards and regulatory requirements.

The Company's approach is also aligned with national regulatory frameworks and emerging international best practices, including Saudi Arabia's Personal Data Protection Law (PDPL), National Cybersecurity Authority (NCA) controls and the SDAIA AI Ethics Principles, making sure that AI innovation remains consistent with national digital governance priorities.

AI Governance Structure and Oversight

Management of responsible AI deployment is distributed across multiple levels, guaranteeing cross-functional oversight throughout the AI lifecycle. Key roles include the following.

AI Enablement Office

Supports the integration of AI tools across business units and ensures compliance with governance and security standards.

AI Committee

Internal Management Committee, which provides strategic oversight and guidance on AI governance, maintaining compliance with ethical, legal, privacy and cybersecurity requirements.

Research and AI Division

Responsible for designing, developing and testing AI systems while ensuring fairness, transparency and security in model development.

Cybersecurity, Data Governance and Privacy Committee

Provides strategic oversight of AI-related cybersecurity, privacy and regulatory compliance requirements.

Technology teams

Implement and maintain the security configuration of AI tools and oversee the integration of technical safeguards.

Risk Management and Business Continuity functions

Assess AI-related risks and integrate AI systems within organizational risk management and resilience frameworks.

This integrated governance model makes certain that AI risks are managed across multiple operational layers, from technology development and deployment to enterprise risk management and regulatory compliance.

Ethical Principles and Responsible AI Design

AI systems at elm follow a set of ethical principles designed to guarantee fairness, transparency and accountability throughout the technology lifecycle. These principles include:

Fairness

AI systems are designed to minimize bias and avoid discriminatory outcomes by carefully reviewing training datasets and model design.

Transparency

Documentation standards and explainable AI practices ensure stakeholders can understand how AI models function and how decisions are made.

Accountability

Clearly defined ownership structures and human oversight mechanisms maintain responsible decision-making and traceability.

Privacy and data protection

AI systems are developed in compliance with applicable data protection laws, safeguarding the secure processing of personal and sensitive data.

These principles are embedded across the AI lifecycle through governance checkpoints, including structured use-case intake reviews, design validation processes, cybersecurity assessments and deployment approval procedures.

Secure Development and Operational Controls

AI systems are developed and deployed using a structured risk management approach designed to safeguard security, privacy and operational reliability in alignment with the following lifecycle.

Development stage	Testing stage	Deployment stage
Secure architecture design and network segmentation	Security architecture reviews and vulnerability assessments	Secure deployment protocols and access controls
Use of anonymized or minimized datasets where possible	Penetration testing and secure code review prior to release	AI-specific firewall protections to mitigate prompt injection and adversarial attacks
Encryption of data at rest and secure model development environments		Continuous monitoring for anomalies or unauthorized activity

AI systems are also integrated within elm's Business Continuity and Disaster Recovery frameworks, ensuring operational resilience and service continuity during disruptions.

Responsible AI continued

Responsible Use of Generative AI

As generative AI tools become more widely used across business functions, elm has introduced structured cybersecurity guidelines governing their use by employees.

These guidelines are designed to make sure that employees can benefit from AI productivity tools while minimizing cybersecurity, privacy and intellectual property risks. They emphasize several key safeguards:

- Use of official AI tools approved by Corporate Technology wherever possible
- Avoiding the input of sensitive or confidential company data into public AI systems
- Verification and review of AI-generated outputs before use
- Compliance with intellectual property laws and platform terms of service
- Secure access to AI platforms through trusted devices and networks

Employees are required to complete training on responsible AI practices and are encouraged to report any potential AI-related security incidents to cybersecurity teams for assessment and remediation.

In 2025, a total of

10,224 hours

of AI-related training were undertaken by employees.

Strategic AI Priorities in 2025

During 2025, elm advanced several priority areas within its AI development roadmap:

1. AI infrastructure and foundational capabilities, enabling scalable deployment and reuse of AI models across platforms and services.
2. Generative AI applications, including intelligent assistants that evolved from internal productivity tools into commercial client-facing services.
3. Agentic AI systems, enabling multi-step workflow automation and decision support while maintaining human oversight.

To manage increasing demand for AI innovation across the organization, elm introduced a centralized AI use-case ideation and intake process, enabling structured prioritization and reducing duplication across business units.

Employee engagement with AI initiatives has also grown significantly. Structured learning tracks were expanded in 2025, while more than 54 cross-functional teams participated in an internal AI hackathon, promoting experimentation and knowledge-sharing across departments.

Employee feedback indicates strong cultural readiness for AI adoption, with high awareness levels and minimal resistance to AI-driven transformation.

AI for Accessibility and ESG Impact

Responsible AI development at elm extends beyond operational efficiency to include social value creation and digital inclusion. Several AI-enabled solutions developed by the Company demonstrate this commitment, including:

- Absher Assistant provides 24/7 AI-enabled support to citizens and residents, improving accessibility to government services
- Nusuk Assistant supports Hajj and Umrah pilgrims in multiple languages and regional dialects. It helps pilgrims understand their Hajj and Umrah journey, find the right Nusuk services and access trusted religious guidance – all through a simple chat, right inside the app
- Arabic dialect large language models improve linguistic accuracy and accessibility across diverse user groups
- AI-powered autism detection tools use advanced computer vision to support early, non-invasive diagnosis and timely medical intervention

In addition to social impact, elm integrates environmental considerations into AI development and research priorities. Current initiatives include:

- Optimizing edge hardware design to reduce idle energy consumption
- Leveraging digital twin technologies to improve planning accuracy and operational efficiency
- Applying AI-driven analytics to increase resource optimization across digital infrastructure

These tools lowered development cycle times while improving quality and standardization. AI deployment is governed by structured oversight mechanisms integrated within elm's delivery model. Human-in-the-loop validation, standardized quality gates and documentation protocols ensure accountability and transparency throughout system development.



Customer centricity at elm is embedded as a structured governance discipline linking service performance, responsiveness and long-term partnership value.

- Survey Architecture and Analytics
- Operational Monitoring
- Customer Voice Integration
- Complaint Tracking
- Accountability and Feedback Loops

Enhancing Service Delivery

In 2025, client feedback underscored the importance of practical, context-aware advisory support, reflecting a strong appreciation for consultants' understanding of the local ecosystem, regulatory landscape and operational realities. Clients emphasized the value of early stakeholder engagement, consistent communication throughout delivery, and focus on actionable, outcome-driven recommendations.

In response, targeted measures were implemented to enhance service delivery. Engagement scopes were refined to maintain clarity from the outset, governance and reporting frameworks were strengthened during execution, and client touchpoints were increased to maintain alignment.

Delivery teams also adopted more iterative and collaborative approaches, enabling faster feedback cycles and closer alignment with client expectations. These enhancements are embedded within standardized delivery frameworks and continuous feedback mechanisms ensuring lessons learned are systematically integrated into future engagements.

While quantitative impact measurement continues to evolve, consulting engagements have delivered strong qualitative value, including improved decision-making clarity, stronger alignment between strategy and execution, enhanced stakeholder confidence and more defined governance and accountability structures. Clients also reported strengthened internal capabilities, improved cross-functional collaboration and increased readiness to advance digital and operational transformation initiatives.

Customer Satisfaction

Customer satisfaction monitoring is conducted through a standardized CSAT-based framework using AXI methodology. The assessment covered approximately 60% of customers in 2025. Insight was systematically reported to leadership and translated into product backlogs and targeted corrective action plans, guaranteeing continuous service improvement.

Key stakeholder platforms demonstrated strong performance, with MOI – Absher achieving a CSAT score of 96%, while GACA – Security Permits recorded productivity indices of up to 100%. These results reflect high levels of operational reliability and strong service efficiency.

As the user base and platform adoption expanded, complaint volumes increased accordingly. However, resolution performance remained strong, with resolution rates reaching 92% in 2025 and year-on-year improvements in first-call resolution, indicating enhanced responsiveness and service effectiveness.

Around
60,000
users engaged on products and projects

93%
average Customer Satisfaction (CSAT) score



Customer Complaint Resolution

Customer Satisfaction



Advancing Customer Experience Through BPO Operations

Rawdah Al-Sharifah Visitor Experience

92%
visitor satisfaction rate

4.98/5
across key service dimensions

9.93/10
recommendation score

Culture House

95%
satisfaction rate across cultural activities

Maintained consistent positive feedback
across visitor engagement channels

Looking Ahead

Building on the progress achieved in 2025, elm will continue to strengthen its digital governance framework, enhance platform scalability and deepen its customer-centric operating model.



Responsible Governance

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Human Rights in the Value Chain	142
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100%

of employees acknowledge the Code of Conduct

Zero

Data security breaches



Strong governance at elm is designed not only to ensure regulatory compliance, but to enable disciplined growth, protect stakeholder interests and reinforce long-term value creation.

Overview

Strong governance is fundamental to elm's ability to operate as a trusted national digital partner and publicly listed company. As the organization continues to scale its digital platforms, expand partnerships and deliver mission-critical services across the Kingdom, effective governance ensures that growth remains disciplined, transparent and aligned with stakeholder expectations.

A unified governance framework integrates Board-level supervision, enterprise risk management, cybersecurity oversight and ethical compliance, enabling responsible decision-making, safeguarding operational resilience and reinforcing the integrity of the Company's digital ecosystems. Independent assurance mechanisms, clearly defined responsibilities and structured reporting processes ensure that risks are identified early, controls are monitored effectively and strategic decisions are taken with appropriate oversight. These practices strengthen investor confidence, protect customer and government relationships, and support sustainable growth.

In 2025, elm continued to strengthen its governance maturity through enhancements to enterprise risk management processes, expanded cybersecurity and data privacy governance, and increased oversight of emerging risks such as AI deployment and third-party digital supply chains. These efforts reinforce a risk-aware culture across the organization, maintaining alignment with national regulatory frameworks and international standards.

Together, these efforts enable elm to balance innovation with accountability, ensuring that the Company's digital transformation efforts are supported by disciplined oversight, strong ethical foundations and resilient risk management practices.



2025 Highlights

In 2025, elm continued strengthening its governance architecture to support responsible growth, operational resilience and regulatory compliance. Key developments included enhancements to subsidiary governance, expanded enterprise risk management practices, increased oversight of emerging risks such as AI deployment, and continued reinforcement of ethical standards across the organization.

Implementation of a formal **Subsidiary Governance Framework** to strengthen alignment across fully owned entities

Zero
number of actual cyberattacks

Ongoing enhancement of the Enterprise Risk Management Framework, aligned with
ISO 31000
standards

Strengthening of business continuity capabilities, supported by
ISO 22301
certification

Continued reinforcement of **ethical conduct policies and whistleblowing mechanisms**

Sustained
zero
regulatory fines and sanctions, reflecting the effectiveness of internal governance controls

Governance, Ethics and Accountability

Strong governance at elm is designed not only to ensure regulatory compliance, but to enable disciplined growth, protect stakeholder interests and reinforce long-term value creation. As a publicly listed company, elm operates under a structured corporate governance framework aligned with the regulations of the Capital Market Authority (CMA) and other relevant national authorities.

Governance Structure

GRI 2-9

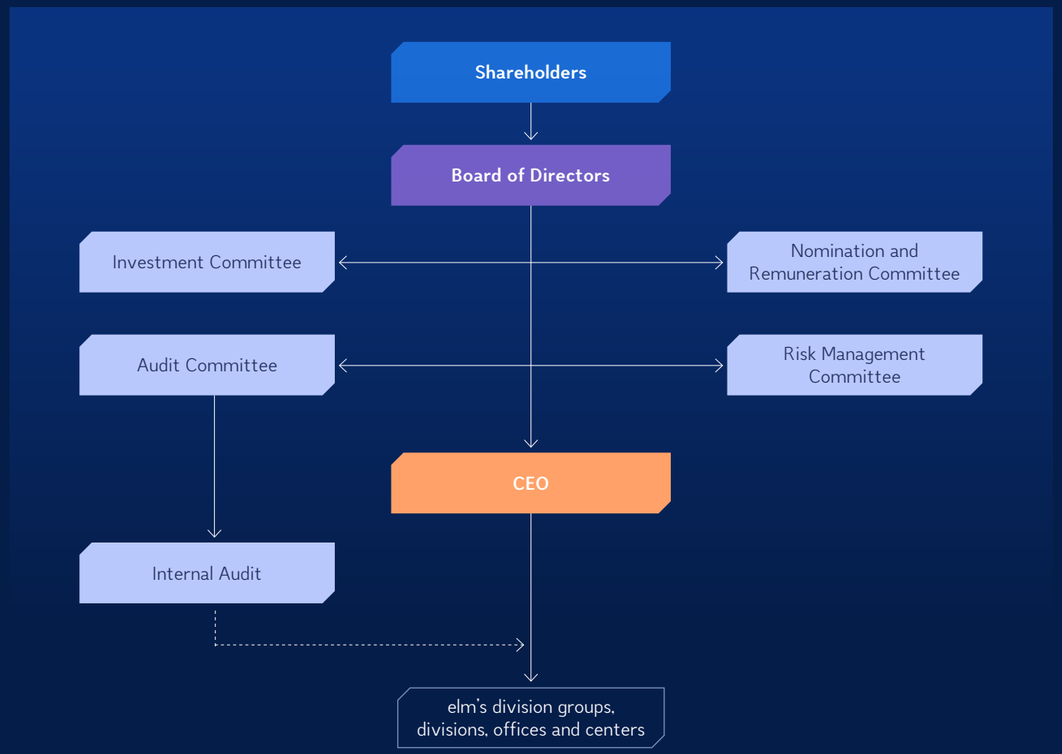
elm's governance framework is structured to retain effective oversight of strategy, performance, risk and compliance across the organization. Oversight begins at the Board of Directors, providing strategic guidance and supervision of the Company's management, ensuring that business activities are conducted in accordance with regulatory requirements and corporate governance principles.

To strengthen oversight and uphold best governance practices, elm has established four Board committees in accordance with its Prospectus and the Capital Market Authority (CMA) Corporate Governance Regulations. These specialized committees are responsible for monitoring key areas of governance and operational performance.

- Audit Committee
- Nomination and Remuneration Committee
- Investments Committee
- Risk Committee

For detailed information on committee members, their roles and meetings held during the year, please refer to pages 117-122 of the 2025 Annual Report.

Organizational Structure



Board of Directors

GRI 2-9, 2-10, 2-13

The Board of Directors plays a central role in guiding elm's strategic direction and ensuring effective governance across the organization. Board members are selected by the Company's shareholders based on their professional expertise, leadership experience and ability to contribute to the Company's strategic priorities.

The Board's composition reflects a broad range of competencies across areas such as digital transformation, financial management, governance, risk oversight and public sector engagement. This diversity of expertise enables informed decision-making and strengthens the Board's ability to oversee a complex digital services environment.

Board responsibilities include, but are not limited to the following.

Strategic planning: Setting plans, policies, strategies and objectives, supervising their implementation periodically, and safeguarding the availability of human and financial resources.

Financial oversight and control: Determining the most appropriate capital structure, implementing internal control procedures and managing the Company's financial assets, cash flows and credit relationships.

Disclosure and transparency: Preparing and approving financial statements, and overseeing the accuracy of material information provided to shareholders.

Governance and compliance: Setting membership standards, regulating stakeholder relationships, and ensuring compliance with CMA regulations and laws.

Conflict of interest: Notifying the General Assembly of any Board member's direct or indirect interest in the Company contracts.

General Assembly: Providing recommendations to the Ordinary and Extraordinary General Assembly as appropriate.

Committee management: Forming Board committees, defining their roles and powers, specifying members' duties and terms, and overseeing and evaluating their performance.

Remuneration policy: Specifying employee remuneration types, including fixed, performance-linked and share-based compensation.

Values and standards: Setting the professional values and standards that govern the Company's work.

Board effectiveness is reinforced through structured governance practices, including periodic evaluations, director training and continuous professional development to ensure Board members remain informed about regulatory developments and evolving governance practices.

Board Composition

GRI 2-11, 2-12

In 2025, the Board comprises nine members – including six non-executive and three independent members – reinforcing strong oversight, objective decision-making and alignment with corporate governance best practices. The Board includes eight male and one female member, reflecting gender representation within the governance framework. This structure indicates a clear distinction between management and oversight, supporting accountability and transparency.

Governance, Ethics and Accountability continued

Board membership

	2025	2024	2023
Board members	**9**	9	9
Executive members	**0**	0	0
Non-Executive members	**6**	6	6
Independent members	**3**	3	3
Male Board members	**8**	8	8
Female Board members	**1**	1	1

The Board of Directors is structured to provide strong oversight and clear accountability. From among its members, the Board appoints a Chairman and Vice Chairman, with clearly defined roles and responsibilities in accordance with the Company's Articles of Association and applicable regulations. The Chairman does not hold any executive role, ensuring a clear separation between management and oversight. Board members – including the Chairman, Vice Chairman and Secretary – serve a four-year term and may be reappointed.

In line with the Nomination Policy and Standards for Board Membership, the Board includes a minimum of two Independent Directors or at least one-third of its members, whichever is greater, while the majority of members are Non-Executive Directors.

elm is committed to fostering inclusive leadership. While Board appointments are ultimately determined by shareholder voting, the current Board composition, including female representation, is a result of shareholder decisions that recognize diverse expertise, supporting the broader national vision for inclusive leadership in alignment with elm's strategic approach.



The current term of Board members commenced on 25 November 2024.



Mr. Rayad Abdullah bin Ahmed

Chairman of Board of Directors - Non-Executive



Mr. Raed Abdullah Ismail

Vice Chairman of Board of Directors - Non-Executive



H.E. Dr. Esam Abdullah Alwagait

Board member- Non-Executive



H.E. Ms. Alshayhana Saleh Alazzaz

Board member - Non-Executive



H.E. Eng. Thamer Mohammad Alharbi

Board member - Non-Executive



Mr. Abdullah Saad Alsalem

Board member - Non-Executive



Dr. Khaled Abdulaziz Alghoneim

Board member - Independent



Mr. Abdularahman Mohammed Alodan

Board member - Independent



Mr. Faris Ibrahim Alrashed Alhumaid

Board member - Independent

- Committee Chairman
- Nominations and Remunerations Committee
- Risk Management Committee
- Audit Committee
- Investment Committee

For detailed information about the members of the Board of Directors, please refer to pages 109-114 of the 2025 Annual Report.

Governance, Ethics and Accountability continued

Board Election Criteria

In line with elm's Articles of Association, the General Assembly of Shareholders appoints the Board of Directors for a four-year term. Shareholders may nominate themselves or other candidates for Board membership, subject to eligibility requirements set out in elm's Nomination Policy and Standards for Board Membership. These standards ensure that the Board is composed of individuals with the expertise, integrity and commitment necessary to support the Company's governance and sustainability objectives.

- Board members shall be professionally capable and have the required experience, knowledge, skill and independence, along with the academic qualifications not less than a bachelor's degree, which enable him/her to perform his/her duties efficiently, effectively contribute in the Company management, enhance its prosperity and safeguard its interests.
- A Board member should not have been previously dismissed or removed from the board of directors of a joint-stock company or from the management of any entity due to negligence, mismanagement or irregular attendance at board meetings or its committees.
- A Board member shall not be a member of the Boards of Directors of more than the number allowed by the regulations on listed joint stock companies at the same time.
- Independent Board members must maintain full independence in their position and decisions and should not be subject to any independence impairments as stipulated in the governance regulations issued by CMA.
- A Board member shall be in good health and shall not suffer from any health issue that may hinder him/her from performing his/her duties and responsibilities.
- A Board member should not have been convicted of cases involving dishonor or dishonesty.
- A Board member should not be an employee of a competing company or involved in any activity that competes with the Company.

Board Oversight and Authority

In accordance with the Company's Articles of Association – and subject to the mandates of the Ordinary General Assembly – the Board of Directors holds authority to oversee the management of the Company, direct its affairs and execute activities and transactions that support the achievement of its strategic objectives. These powers exclude matters expressly reserved for the General Assembly under the Companies Law or the Articles of Association.

In the absence of any Ordinary General Assembly imposed restrictions on the Board of Directors regarding particular concerns, the Board is further empowered to delegate, at its discretion, one or more of its members or external parties to execute designated functions within its jurisdiction.

The Company has established a Board Charter that governs the functioning of the Board by clearly defining its roles, responsibilities, authorities and procedures in alignment with applicable regulations and internal policies.

Subsidiary Governance Framework

In 2025, elm strengthened governance alignment across its subsidiaries through the implementation of a formal Subsidiary Governance Framework. This framework clarifies governance roles, reinforces reporting lines and ensures alignment between elm and its fully owned entities. Governance rights, Board representation and oversight mechanisms are structured to balance accountability with operational flexibility while maintaining strategic alignment across the Group.



General Assembly Meeting

Invitation

General or Special Assemblies are convened by the Board of Directors in accordance with elm's Articles of Association, the Companies Law and applicable regulations set forth by the Ministry of Commerce and other competent authorities. The Board must initiate an Ordinary General Assembly within 30 days if requested by the auditors, the Audit Committee or shareholders representing at least 10% of the voting shares. If the Board neglects to issue the invitation, the auditor may call the assembly directly.

Attendance

All shareholders have the right to attend the General Assembly meetings and may authorize another shareholder, excluding Board members, to attend on their behalf, in accordance with applicable laws and regulations.

Voting

As per elm's Shareholder Manual, shareholders with voting rights are entitled to one vote per share during the General Assembly. Cumulative voting applies to electing Board members.

Discussions and agenda

Shareholders may discuss agenda items and direct questions to Board members and the auditor. Shareholders holding at least 10% of voting shares may propose additional items for the agenda.

For more information on elm's General Assembly processes, please refer to the Company's Articles of Association.

Governance, Ethics and Accountability continued

Company Shares

elm's shares are classified as ordinary shares, which means each share grants its holder one vote in General Assembly meetings. The Public Investment Fund owns 67% of these voting shares.

Board and Committees Training and Assessment

GRI 2-17, 2-18

elm provides comprehensive orientation programs for newly appointed Board members, covering the Company's strategy, business model, financial and operational landscape, as well as the rights, roles and responsibilities of Board members. In 2025, all Board members took part in a three-hour training session on strengthening alignment and mutual understanding between the Board and management, delivered by an external strategy and governance expert.

A comprehensive internal evaluation of the Board and its committees was conducted during fiscal year 2024. The Nominations and Remunerations Committee has resolved to conduct an external evaluation for the fiscal year 2025 to assess performance, identify strengths and areas for improvement, and further enhance the effectiveness of the Board and its committees in the coming months.

Sustainability Governance

Sustainability oversight forms an integral part of elm's governance framework. The Investor Relations department is responsible for preparing the Company's annual Sustainability Report in coordination with the relevant business functions and sharing it with Executive Management before it is submitted to the Board of Directors for review and approval, ensuring that sustainability priorities are aligned with the Company's strategic direction.

As part of its ongoing commitment to strengthening sustainability practices, the Board of Directors directed the development of a comprehensive Sustainability Strategy during 2025. The Company is currently developing this strategy in coordination with the relevant functions, with the aim of completing the necessary internal approvals before submitting it to the Board of Directors for approval.

elm continues to explore opportunities to further integrate environmental, social and governance (ESG) practices across its operations, amid growing institutional focus on sustainability topics and an increasing level of commitment to sustainability across the Company.



Ethics, Conduct and Regulatory Discipline

GRI 2-23, 2-24

elm maintains a strong ethical culture supported by clear policies, structured governance processes and ongoing employee awareness initiatives. The Company applies a zero-tolerance approach to bribery, fraud and misconduct, reinforcing a culture of integrity and accountability across all operations.

Ethical standards are formalized through the Code of Conduct, which outlines the expected behaviors and professional standards for all employees. The Code provides guidance on ethical decision-making, conflict of interest management, anti-corruption principles and compliance with applicable laws and regulations.

100%

of employees have formally acknowledged the Code of Conduct upon onboarding, with annual re-acknowledgment processes in place to reinforce continued adherence to ethical standards.

Whistleblowing Policy

GRI 2-25, 2-26, 2-27

elm has established a comprehensive Whistleblowing Policy that enables all stakeholders to report any conduct or practice suspected of violating applicable laws and regulations, the Company's policies or its Code of Professional Conduct and Ethical Values. The policy provides secure and confidential reporting channels, with the option for reporters to remain fully anonymous, that protect whistleblowers while fostering a culture of integrity, transparency and accountability.

The Company encourages employees, contractors and other relevant stakeholders to report, in good faith, any suspected misconduct or irregularities, including fraud, corruption, misuse of assets, conflicts of interest, violations of laws, regulations or internal policies. Reportable matters include workplace misconduct such as bullying, discrimination, harassment or any practices that may adversely affect the work environment or the Company's interests.

All reports are managed in accordance with approved governance procedures that ensure confidentiality, impartiality and independence throughout the assessment and investigation process. Reports are evaluated, investigated and addressed based on their nature, while maintaining the confidentiality of whistleblowers and protecting them from retaliation.

Significant whistleblowing cases and their resolution are subject to the oversight of the Audit Committee. The Internal Audit Sector provides periodic reports on whistleblowing trends and case outcomes, supporting effective governance and the continuous enhancement of the Company's integrity and compliance framework.

To facilitate confidential reporting, the Company provides multiple reporting channels, including:

- An externally and internally accessible whistleblowing portal, administered independently by the Internal Audit Sector, which enables reporters to track the status of their cases and raise queries related to the Company's control environment and culture
- Dedicated whistleblowing email address
- Direct telephone access to the Chief Audit Executive
- Other reporting channels established under the Whistleblowing Policy

During 2025, elm delivered numerous awareness sessions for employees, contractors and trainees to enhance awareness of the whistleblowing process, whistleblower protection and to further strengthen the Company's culture of integrity and compliance.

Governance performance

	2025
Total number of governance body members to whom the organization's anti-corruption policies and procedures have been communicated	9
Total number of non-monetary sanctions	0
Total amount of legal and regulatory fines and settlements	0
Percentage of legal and regulatory fines and settlements that resulted from whistleblowing actions	0

Governance, Ethics and Accountability continued

The absence of legal or regulatory sanctions during the reporting period reflects the effectiveness of elm's governance and compliance systems. Continuous communication of anti-corruption policies to governance bodies ensures ethical standards remain clearly understood at the highest levels of the organization. These outcomes demonstrate the strength of elm's governance culture and the effectiveness of its internal controls in preventing misconduct and ensuring regulatory compliance.

Key Policies

GRI 2-23, 2-24

elm has established a suite of governance policies that underpin its approach to transparency, accountability and responsible business conduct. These policies provide clear guidance on key governance areas and are subject to periodic review to ensure alignment with applicable regulations and evolving best practices.

Stakeholder Engagement Policy	Establishes the principles and mechanisms for engaging with stakeholders, including access to information, grievance submission processes and confidentiality of stakeholder data, supported by designated communication channels and Board-level oversight.
Disclosure and Transparency Policy	Governs the timely and accurate disclosure of information through Tadawul and other approved channels, ensuring stakeholders receive clear, complete and non-misleading information while safeguarding confidential and material data.
Conflict of Interest and Related Party Transactions Policy	Defines the controls and procedures for identifying, assessing and disclosing actual or potential conflicts of interest, making sure related party transactions are conducted transparently and in compliance with regulatory requirements.
Social Responsibility Policy	Guides the Company's approach to delivering positive social impact through structured initiatives aligned with sustainable development priorities, while balancing business objectives with broader community needs.
Remuneration Policy of Board of Directors, its subcommittees and the executive management	Sets out the principles governing the remuneration of Board members, committees and executive management, ensuring that compensation is fair, performance-linked and aligned with regulatory requirements and the Company's strategic objectives.

Internal Audit

The Internal Audit Sector plays a pivotal role in strengthening elm's governance framework and reinforcing organizational trust by providing independent and objective assurance and advisory services. These services are designed to evaluate and enhance the effectiveness of governance, risk management and internal control processes, thereby supporting the achievement of the Company's strategic objectives and the sustainability of its operations, in accordance with the Global Internal Audit Standards issued by the Institute of Internal Auditors (IIA).

Functionally reporting to the Audit Committee, the Internal Audit Sector maintains its independence and objectivity while executing a risk-based annual audit plan approved by the Audit Committee. The plan is continuously aligned with emerging risks and the Company's strategic priorities.

The scope of Internal Audit covers the Company's significant activities and operations, such as the evaluation of the effectiveness of internal controls, risk management processes, compliance with applicable laws, regulations and internal policies, cybersecurity and information security controls, business continuity and disaster recovery. It also provides independent assurance over governance and controls relating to environmental, social and governance (ESG) matters within the approved audit scope. In 2025, the sector enhanced this coverage by integrating emerging ESG risks, climate-related issues and supply chain due diligence into its audit scope, and it periodically evaluates whether ESG-related risks are appropriately addressed within the Enterprise Risk Management (ERM) framework, with the Board regularly updated on major ESG-related observations.

In line with the Company's evolving business landscape, the Internal Audit sector conducts specialized audits covering technology-enabled processes and emerging risks, including cybersecurity, data governance and artificial intelligence, applying a risk-based audit methodology to provide timely and value-added assurance. To support audit quality and consistency, the sector has developed a comprehensive set of internal policies and frameworks, including a Quality Assurance Policy, Continuous Audit protocols, Escalation Procedures and Sampling Guidelines, with all audit testing processes thoroughly documented and securely maintained in the audit management system.

The sector reports the results of its audit engagements to the Audit Committee and follows up on the implementation of agreed management actions with the relevant business units. This contributes to strengthening accountability, driving continuous improvement, enhancing operational effectiveness and reinforcing the Company's internal control environment.

In addition to its assurance and advisory role, the Internal Audit Sector promotes a strong culture of governance, integrity and ethical conduct by delivering awareness initiatives and providing guidance on professional ethics and whistleblowing mechanisms, in coordination with relevant functions, while fully preserving its independence and objectivity.

Risk Management

GRI 2-27
SASB TC-SI-550a.1

Risk management at elm is treated as a shared organizational responsibility and elm's risk governance approach reflects its commitment to strong corporate governance and disciplined oversight. The Board of Directors sets the tone by reviewing and adopting governance practices that align with the Company's strategic direction, as well as endorsing its risk policy. Central to this framework is the Board Risk Committee, which oversees the enterprise risk profile to ensure alignment with elm's long-term objectives.

The Committee provides ongoing oversight of elm's risk management system, monitoring its effectiveness and alignment with leading practices. Its responsibilities include regularly reviewing enterprise-level risks and assessing the Company's risk appetite, supported by comprehensive evaluations conducted by elm's independent risk management function. This oversight enables elm to proactively address potential risks and maintain a strong position in safeguarding its stakeholders and assets.

elm's practices are fully aligned with the internationally recognized Three Lines Model of the Internal Auditors Association. As an independent second-line control function, the risk management unit operates separately from business units and sectors, ensuring impartial oversight and rigorous evaluation across the Company. Through structured, cyclical assessments conducted in line with Board-approved policy, the function supports continuous improvement and strengthens risk discipline across the organization.

Governance, Ethics and Accountability continued

Board of Directors/Audit, Risk and Compliance Committee
(Accountability to stakeholders for organizational oversight)

Governing body roles: integrity, leadership and transparency

Management
(Actions including managing risk, to achieve organizational objectives)

Internal Audit
(Independent assurance)

1st line

Operational Management

- Functions that own and manage risks
- Implement the response/ mitigation strategies
- Periodical monitoring and reporting

2nd line

Risk Management

- Oversight and monitoring of risk management processes and activities conducted by the first line
- Develop policies, procedures and frameworks
- Periodic monitoring and reporting risks to senior management, the Risk Management Committee and the BoD

3rd line

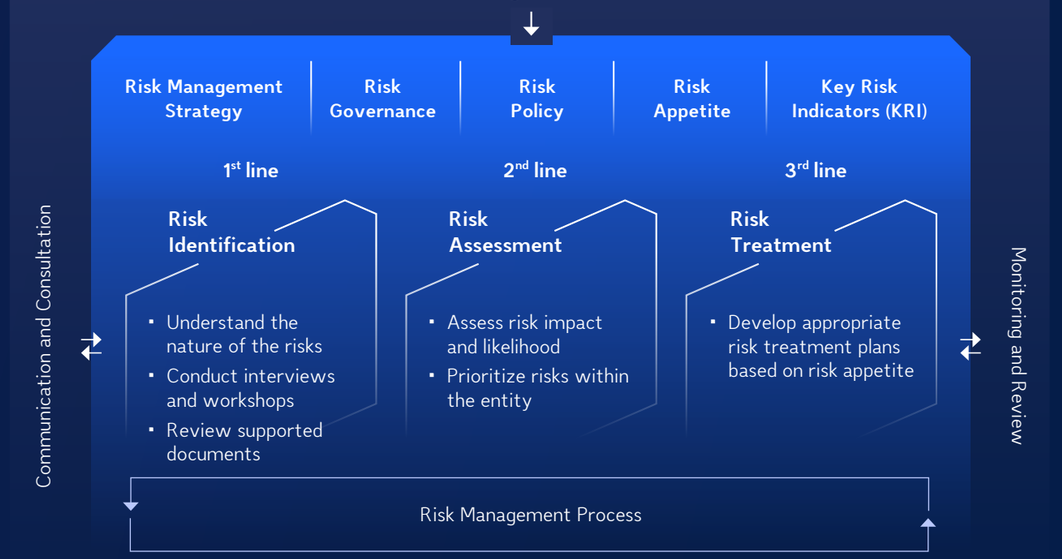
Internal Audit

- Provide independent assurance
- Assess the adequacy and effectiveness of the risk management practices and control environment
- Communicate audit findings to senior management, the Audit Committee and the BoD

elm embeds a forward-looking risk philosophy across its operations, focusing on early identification of potential disruptions and proactive mitigation to support resilience, protect stakeholder interests and enable sustainable long-term value creation.

elm's Risk Management Framework is aligned with ISO 31000:2018 and relevant national regulatory standards, including those issued by the Ministry of Communications and Information Technology. The framework follows a structured lifecycle covering risk identification, assessment, mitigation, monitoring and reporting.

elm's Risk Management Framework



The framework is supported by Board-approved risk policies and a defined risk appetite, which is regularly reviewed and aligned with the Company's strategic objectives to ensure consistent and risk-informed decision-making across the organization.

The framework addresses a wide range of risk categories, including:



ESG Risks

elm integrates ESG risks into its enterprise risk management framework, recognizing their potential impact on long-term value creation, regulatory compliance and stakeholder expectations.

ESG risks are identified, assessed and monitored as part of the Company's standard risk management processes, with defined thresholds incorporated into risk appetite metrics and evaluation criteria. This makes certain that sustainability-related risks are systematically considered alongside strategic, operational and financial risks.

Environmental and social risks are evaluated through structured assessments, including operational reviews and stakeholder engagement inputs, enabling elm to identify emerging risks related to resource use, workforce dynamics, regulatory developments and broader societal expectations.

Risk mitigation strategies are aligned with the Company's sustainability priorities, supporting proactive management of ESG-related exposures and strengthening long-term resilience.

To enhance transparency and provide a forward-looking view of key ESG-related risks, elm has identified the following priority risk areas and corresponding mitigation approaches.

Governance, Ethics and Accountability continued

Risk Area	Risk Type	Potential Impact	Mitigation Action
Privacy and data management	Technological	Regulatory fines, data leakage, confidentiality breach and reputational impact	▪ Implementation of a robust privacy framework aligned with government data regulations ▪ Comprehensive policies for data protection, classification, retention and secure disposal ▪ Ongoing privacy risk mitigation strategies and governance controls ▪ Full compliance with the Personal Data Protection Law (PDPL)
Regulations and compliance	Regulatory	Regulatory penalties, customer dissatisfaction, competitive disadvantage, loss of trust	▪ Continuous monitoring of evolving regulatory landscape and emerging requirements ▪ Adoption of best practices in AI, data governance and FinTech ▪ Dedicated governance and compliance function providing oversight and guidance ▪ Active coordination with internal and external stakeholders to ensure compliance
Employee safety and security	People and environmental	Safety hazards, work injuries, fatality	▪ Dedicated function for environment and personnel safety ▪ Implementation of administrative, technical and operational safety controls ▪ Regular fire drills, awareness programs and preventive maintenance ▪ Defined emergency procedures and response protocols

Risk Area	Risk Type	Potential Impact	Mitigation Action
Attracting and retaining talent	People and environmental	Impact on employee morale, work culture, talent retention and organizational reputation	▪ Strategic focus on workforce culture, learning and development ▪ Regular culture assessments, gap analyses and engagement initiatives ▪ Promotion of values such as agility, collaboration, innovation and excellence ▪ Continuous workforce development and talent management programs
Artificial intelligence and emerging tech	Technological	Emerging tech adoption	▪ Deployment of AI-driven solutions, including advanced analytics and intelligent automation ▪ Development of proprietary models and digital capabilities ▪ Implementation of AI governance frameworks and use-case assessments ▪ Alignment with risk appetite, cybersecurity policies and ethical AI principles
Rapidly evolving technology landscape	Technological	Technological obsolescence and loss in availability and performance	▪ Continuous technology modernization and infrastructure upgrades ▪ Regular system and platform assessments aligned with business strategy ▪ Integration of technology initiatives into strategic roadmap ▪ Maintenance of resilient infrastructure, including primary and disaster recovery data centers
Growing number of advanced cyber threats	Cybersecurity	Loss of confidentiality, integrity and availability of data, services, systems and products	▪ Implementation of robust cybersecurity policies, procedures and controls ▪ Continuous security monitoring and threat management ▪ Regular penetration testing and vulnerability assessments ▪ Compliance with National Cybersecurity Authority (NCA) requirements

Governance, Ethics and Accountability continued

Risk Monitoring and Reporting

Risk reporting follows a defined governance cadence. The risk management function prepares quarterly reports and provides updates to the Chief Executive Officer, the Risk Committee and the Board of Directors. Risk registers are maintained and regularly reviewed, with key risk indicators (KRI) monitored to ensure that exposures remain within the Company's defined risk appetite.

Risk identification and assessment are supported through structured workshops, continuous internal and external environment scanning and the use of leading and lagging KRIs, enabling proactive monitoring and early identification of emerging risks.

Regular risk assessment workshops are conducted across departments to strengthen awareness and embed risk-based decision-making into operational processes.

In 2025, elm further enhanced its enterprise risk management capabilities by updating its risk appetite in alignment with strategic priorities and expanding the use of KRIs across critical business areas.

For further details on risk management, governance and oversight, please refer to pages 58-66 of the 2025 Annual Report.

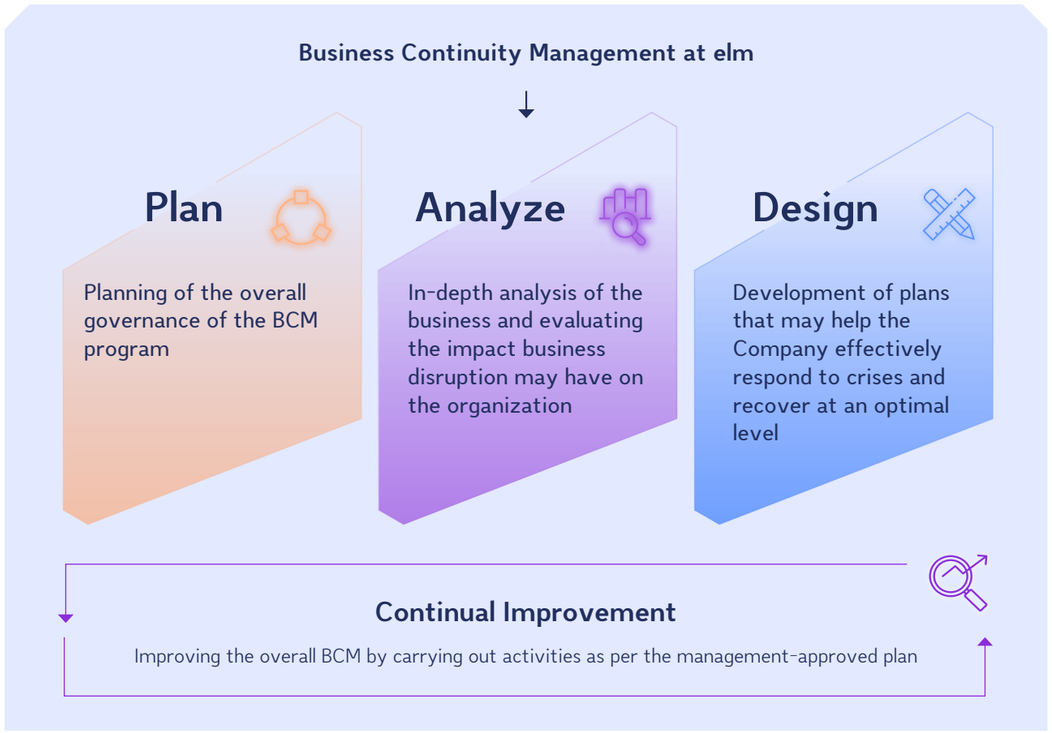
Business Continuity and Organizational Resilience

SASB TC-SI-550a.2

To safeguard operational stability and service continuity, elm maintains a comprehensive Business Continuity Management (BCM) program aligned with the ISO 22301:2019 standard. The program complies with national regulatory frameworks, including controls issued by the Digital Government Authority and the National Cybersecurity Authority. The BCM framework establishes clear policies, responsibilities and governance mechanisms designed to ensure preparedness for operational disruptions.

Key components of the BCM program include:

- Business impact analysis to identify critical services and processes and recovery priorities
- Business continuity planning across operational functions
- Disaster recovery capabilities, including alternate data center readiness
- Structured crisis management protocols
- Regular drills, testing and simulation exercises



In 2025, elm conducted comprehensive business impact analyses and continuity risk assessments across business units, with business continuity plans updated to reflect evolving risk scenarios and operational requirements.

The Company maintains a suite of resilience plans, including IT disaster recovery plans, crisis management plans and incident management plans, all of which are regularly tested through structured exercises and simulations. Lessons learned from exercises and real incidents are documented and used to continuously strengthen response capabilities.

elm operates a structured crisis management model comprising crisis management teams (CMT) at the strategic level and incident management teams (IMT) at the operational level, ensuring coordinated response, clear escalation pathways and effective decision-making during major incidents.

Crisis scenarios are assessed across both technology and non-technology domains, including cybersecurity, system disruptions, climate change risks and operational incidents, with prioritization guided by the Company's enterprise risk impact matrix and defined escalation thresholds.

Oversight of the BCM program is supported through executive reporting and governance committee supervision, ensuring that resilience capabilities remain aligned with the Company's operational risk profile.

Supply chain considerations are also integrated into the Business Continuity framework, with critical third-party dependencies assessed to identify potential single points of failure and maintain continuity of key services.

Business continuity performance and risk insights are reported periodically to executive management and relevant governance committees, including the Risk Committee, to ensure alignment with the Company's risk profile and strategic priorities.

Cybersecurity and Data Privacy

GRI 418-1
SASB TC-SI-220a.1, TC-SI-230a.1, TC-SI-230a.2

As a national digital enabler operating mission-critical platforms for government and business services, elm recognizes that cybersecurity and data protection are fundamental to maintaining stakeholder trust, protecting digital infrastructure and ensuring uninterrupted service delivery. The Company therefore applies a structured, risk-based approach to cybersecurity and privacy governance, embedding protective controls across technology systems, operational processes and product development lifecycles.

Cybersecurity and data protection are treated as strategic priorities that support operational resilience, regulatory compliance and long-term value creation. By integrating cybersecurity governance into enterprise risk management and aligning privacy practices with national and international standards, elm strengthens its ability to safeguard digital ecosystems while enabling continued innovation and platform scalability.

Zero
data security breaches in 2025

Governance and Oversight

Cybersecurity governance at elm operates through a structured oversight model involving both Board-level supervision and executive management accountability. The Audit Committee of the Board of Directors provides high-level oversight of cybersecurity and data protection activities, ensuring that risks are appropriately monitored and mitigation measures are implemented. At the executive level, the Cybersecurity and Data Privacy Committee – composed of senior leadership representatives – regularly reviews security posture, risk exposure and regulatory compliance.

The Cybersecurity General Manager provides regular updates on cybersecurity risks and KPIs to this committee. Significant risks and developments are escalated to the Chief Executive Officer and subsequently reported to the Board Audit Committee through structured reporting mechanisms supported by cybersecurity risk matrices and KPIs.

Cybersecurity functions operate as the second line of defense within elm's three-lines-of-defense governance model. This structure ensures cybersecurity teams provide independent oversight and assurance while operational functions remain responsible for implementing security controls within their systems and processes.

Cybersecurity and privacy risks are formally integrated within the Company's Enterprise Risk Management (ERM) framework, with relevant risks recorded in the centralized Risk Register to enable consistent prioritization, monitoring and escalation.

Monitoring, Detection and Incident Response

To protect its digital infrastructure against evolving cybersecurity threats, elm operates a 24/7 Security Operations Center (SOC) responsible for monitoring networks, systems and applications across the organization.

The SOC constantly analyzes security events to detect suspicious activity, identify potential vulnerabilities and respond rapidly to cybersecurity threats. When incidents are detected, the Company's Incident Response Plan defines clear protocols for investigation, escalation and remediation. These procedures are supported by:

- Continuous vulnerability scanning
- Regular penetration testing
- System security reviews
- Threat intelligence monitoring

Cybersecurity risk management practices are aligned with ISO 27001 standards and relevant national regulatory frameworks, including controls issued by the National Cybersecurity Authority (NCA).

Regular risk assessments are conducted to identify vulnerabilities, regulatory gaps and emerging threats, with mitigation measures implemented based on risk prioritization, including patching, access control enhancements and system hardening.

During 2025, elm strengthened its cybersecurity governance by enhancing risk register visibility, expanding risk-based assessments and strengthening oversight of third-party cybersecurity exposures.

elm follows a structured and comprehensive process to identify, manage and respond to cybersecurity and data privacy incidents, ensuring timely mitigation, regulatory compliance and continuous improvement. This structured approach builds on elm's established data breach management practices, expanding them into a comprehensive incident management lifecycle covering both cybersecurity and data privacy risks.

Incident Management and Data Breach Response Process



Cybersecurity and Data Privacy continued

Cybersecurity Performance and Threat Landscape

SASB TC-SI-230a.1

Despite the significant increase in attempted cyberattacks and threat incidents detected through monitoring systems, elm successfully prevented any successful cyberattacks or data security breaches during the reporting period.

Cybersecurity performance

	2025	2024	2023
Number of cyber threat incidents	**3,867**	795	852
Number of attempted cyberattacks	**177,389,794**	37,800,000	105,957,173
Number of actual cyberattacks	**0**	0	0
Number of data security breaches	**0**	0	0

The increase in detected cyber threat incidents and attempted cyberattacks reflects the expansion of elm's monitoring capabilities, including enhanced Security Operations Center (SOC) coverage, the implementation of additional detection rules and the continued growth of the Company's digital environment.

This demonstrates the effectiveness of elm's layered cybersecurity defenses, continuous monitoring capabilities and proactive incident response mechanisms. The absence of successful attacks or data breaches underscores the strength of the Company's cybersecurity controls and its ability to detect, prevent and respond to evolving threats.

Managing Third-Party and Emerging Cyber Risks

As digital ecosystems expand and reliance on external technology partners increases, elm continues strengthening governance of third-party cybersecurity risks. In 2025, the Company launched the first phase of a Third-Party Risk Management program, designed to enhance visibility and oversight across its vendor and technology supply chain. Key initiatives implemented during the year included:

- Integration of third-party risk management processes with procurement systems
- Enhanced contractual cybersecurity clauses and compliance requirements
- Monitoring of vendor security ratings
- Strengthening breach notification requirements and security obligations in supplier contracts

The Company is also addressing emerging technology risks associated with cloud adoption, artificial intelligence (AI) usage and digital supply chain dependencies. These risks are being managed through expanded risk assessments, strengthened governance controls and the development of secure AI usage guidelines.

Looking ahead, elm will continue advancing cybersecurity maturity through increased automation of third-party risk management, expanded use of governance, risk and compliance (GRC) tools, continuous risk monitoring and deeper integration with enterprise risk management to ensure sustained resilience and protection of digital assets.

elm launched the first phase of a

Third-Party Risk Management program

Training and Awareness

Cybersecurity awareness is embedded across the employee lifecycle to reinforce responsible digital behavior and reduce human-related security risks. All new employees receive mandatory onboarding training covering core cybersecurity practices such as password management, phishing awareness, data handling practices and secure system usage. Ongoing awareness initiatives include:

- Regular cybersecurity awareness campaigns
- Simulated phishing exercises
- Workshops and training sessions for employees
- Specialized awareness sessions and targeted training programs for relevant roles
- The Nabih Cybersecurity Awareness Exhibition covering cybersecurity, legal, risk, and governance sectors, held in two locations (Riyadh and Jeddah)

These initiatives are further supported by continuous communication of security tips, updates on emerging threats and policy changes through internal channels.

In addition, privacy-focused training sessions are delivered to employees involved in personal data processing, covering topics such as data subject rights, controller obligations and privacy compliance procedures. These programs help strengthen cybersecurity awareness across the workforce and reinforce the organization's broader security culture.

13
awareness emails circulated

12
awareness posts published through the Company's communication channels

5
phishing simulation exercises conducted across different scenarios

30+
workshops delivered to employees, including general, specialized and onboarding sessions

The effectiveness of cybersecurity and data governance controls is continuously monitored through a combination of risk assessments, real-time monitoring, incident response tracking and employee awareness indicators. This includes regular identification and mitigation of vulnerabilities, continuous monitoring through the Security Operations Center (SOC), structured incident response processes, periodic system reviews and penetration testing, as well as ongoing employee training and phishing simulations. Compliance is further ensured through adherence to ISO 27001, NCA frameworks and privacy regulations, supported by defined performance indicators and monitoring mechanisms.



Cybersecurity and Data Privacy continued

Privacy and Data Governance

In response to the growing requirements for personal data protection and regulatory compliance, elm has developed its Privacy and Data Governance framework by elevating the responsibilities and mandate of the Privacy Unit into a dedicated department responsible for overseeing privacy activities, monitoring regulatory compliance, and implementing data governance controls across the Company's business sectors. The Cybersecurity, Data Governance and Privacy Committee, which includes representatives from various sectors, oversees this framework by coordinating related initiatives and reviewing regulatory obligations, thereby reinforcing a unified approach to implementing these practices across the Company.

elm's privacy approach is aligned with leading international and national standards and regulatory frameworks, including:

- The Personal Data Protection Law of the Kingdom of Saudi Arabia and its implementing regulations
- National Data Governance Policies, Standards and Personal Data Protection Controls issued by the National Data Management Office
- ISO/IEC 27701 Privacy Information Management System

In 2025, elm's efforts culminated in achieving ISO/IEC 27701 certification, confirming the institutional maturity of its Privacy and Data Governance program and reflecting the alignment of the Company's operational practices with leading international standards and national requirements for personal data protection.

elm adopts an integrated Privacy and Data Governance framework that is built on an executive strategy and a clear roadmap, supported by comprehensive policies and procedures that guarantee privacy requirements are embedded consistently across all products and services.

The Company continues to advance its privacy and transparency practices through periodic regulatory gap assessments, engagement of internal sectors in developing related initiatives, and regular updates to roadmap priorities. This supports consistent implementation of regulatory requirements and strengthens privacy risk management across the Company.

In 2025, elm achieved

ISO/IEC 27701

Privacy Information Management System certification

Embedding Security and Privacy by Design

SASB TC-SI-220a.1

Privacy considerations are integrated into elm's digital development lifecycle through privacy-by-design approach. Privacy team are involved from the earliest stages of product and project development to ensure potential risks are identified and addressed before deployment.

Since establishing its first privacy policy in 2008, elm has progressively embedded Privacy by Design practices across product lifecycles. These practices include early-stage consultation with the Privacy and Data Governance team and the use of privacy impact assessments (PIA) to proactively evaluate personal data processing risks.

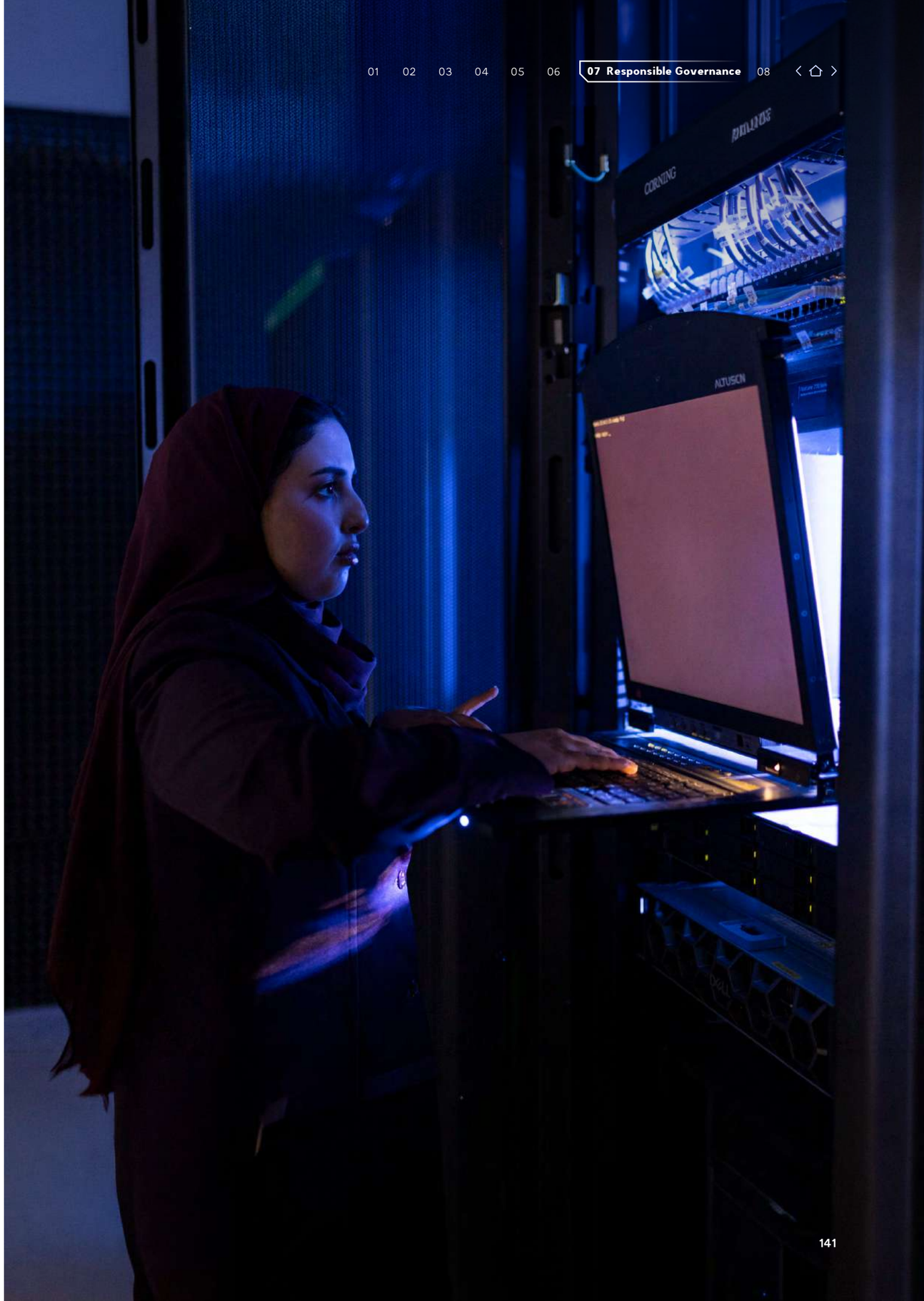
Through this structured process, the Privacy team conducts formal assessments, assigns risk owners and monitors corrective actions to monitor effective mitigation of privacy risks and compliance with regulatory obligations.

Responsible Data Use and Customer Trust

elm ensures the responsible, ethical and secure use of data and digital technologies through clearly defined governance policies, standards, procedures and guidelines aligned with regulatory requirements and best practices.

The Privacy and Data Governance team supports internal teams through awareness sessions and standardized processes for handling data subject requests (DSR), ensuring accurate and compliant processing.

elm also reinforces customer trust by making sure personal data is processed securely and transparently, supported by clear privacy notices and mechanisms that enable individuals to understand and exercise their data protection rights.



Human Rights in the Value Chain

GRI 2-26

elm recognizes that respect for human rights is a fundamental component of responsible business conduct and sustainable transformation. As a publicly listed company operating within national digital ecosystems, the elm's responsibility extends beyond its internal workforce to include suppliers, contractors and other partners across its value chain.

The Company's commitment to ethical conduct and responsible business practices is reflected in its governance framework, Code of Conduct and supplier engagement processes. These mechanisms reinforce expectations that all business activities are conducted with integrity, fairness and respect for internationally recognized human rights principles.

Human Rights within elm's Operations

Within its own operations, elm embeds human rights commitments through structured human capital policies and governance frameworks that promote fair labor practices, non-discrimination, employee well-being and safe working conditions.

Compliance with Saudi Labor Law forms the foundation of these commitments, supported by internal policies that emphasize equality, respect and professional conduct in the workplace. Employees are expected to uphold these principles through adherence to the Company's Code of Conduct and Work Environment guidelines, which are formally acknowledged as part of onboarding processes. To support accountability and transparency, elm provides multiple channels through which employees can raise concerns or grievances. These include:

- A dedicated employee grievance email channel
- An annually announced Grievance Committee process for performance and compensation objections
- A formal whistleblowing platform

Grievance Mechanisms

Complaints are reviewed by an independent Grievance Committee, formed by decision of the Chief Executive Officer. The Committee is responsible for determining appropriate actions and ensuring all matters are handled with due diligence and confidentiality. The Company applies a zero-retaliation policy to reassure employees that they can raise concerns in good faith without fear of adverse consequences.

Outcomes are documented and escalated where required, with periodic reporting provided to executive leadership to maintain oversight and accountability. The committee's responsibilities include the following:

- Employees' grievances against administrative decisions affecting them, except those within the jurisdiction of another committee
- Employees' complaints about malicious actions against them
- Employees' complaints arising from administrative disputes and resolving conflicts between the employee and the manager, supervisor or team leader regarding work and its procedures
- Employees' complaints related to the work environment or violations of procedures and policies

All complaints submitted by employees are considered regardless of the employee's job grade, provided that the committee does not have jurisdiction over any complaint related to the CEO, the Board of Directors or any of its subcommittees.

In 2025, elm reinforced its commitment to enabling a "speak-up" culture by enhancing awareness initiatives and ensuring employees are informed of their rights and the procedures available to raise concerns safely and without fear of retaliation.

Human Rights in the Supply Chain

Human rights considerations are also integrated into elm's supplier engagement processes through contractual commitments and ethical sourcing expectations. Suppliers registering with elm are required to acknowledge and comply with the Company's Supplier Code of Conduct, which sets clear expectations regarding ethical business conduct, labor practices and respect for human rights. The Code is aligned with recognized international standards, including references to the International Labour Organization (ILO), the Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI) and the Ethical Trading Initiative (ETI). Under these principles, suppliers are expected to:

- Uphold the human rights of workers and treat employees with dignity and respect
- Provide safe and healthy working environments
- Prohibit corruption, bribery, extortion and fraudulent conduct
- Avoid conflicts of interest and maintain transparent business practices
- Protect confidential information and intellectual property
- Maintain accurate business records and comply with applicable laws and regulations

The Supplier Code of Conduct also emphasizes the importance of ethical reporting mechanisms. Suppliers are encouraged to report suspected violations of ethical standards or procurement irregularities through established reporting channels, including anonymous whistleblowing mechanisms.

At present, human rights considerations within the supply chain are primarily embedded through contractual requirements and supplier onboarding procedures. During supplier registration and onboarding, vendors are required to acknowledge elm's terms and conditions and confirm their acceptance of ethical expectations, including compliance with the Supplier Code of Conduct. Supplier qualification processes assess relevant certifications, documentation and technical capabilities, while procurement teams conduct structured sourcing processes for high-value categories, particularly within the information technology sector.

Post-purchase supplier evaluations also assess delivery performance, quality standards and communication effectiveness, enabling elm to maintain oversight of supplier performance and operational reliability.

During the reporting period, no human rights incidents were identified within elm's operations or supply chain, and no cases requiring structural reform of the Company's human rights governance were reported. Nevertheless, elm recognizes that responsible value chain management remains an evolving area of governance. As the Company continues to expand its digital ecosystem and supplier network, it will progressively strengthen oversight mechanisms to ensure alignment with evolving ESG expectations and international best practices.

As elm continues to scale its digital platforms and expand its role as a national digital enabler, strong governance, ethical oversight and responsible technology management will remain central to sustaining stakeholder trust and long-term value creation.



Appendices

GRI Context Index	**148**
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Alignment with UNSDGs	**158**

GRI Content Index

GRI Standard	Disclosure	Location and/or direct answer	Omission: Requirement(s) Omitted	Omission: Reason	Omission: Explanation
General Disclosures					
GRI 2: General Disclosures 2021	2-1 Organizational details	Pages 10 – 11 (About elm) Pages 24 – 25 (2025 Annual Report > Shareholders Information)	-	-	-
	2-2 Entities included in the organization's sustainability reporting	Pages 8 – 9 (About this report)	-	-	-
	2-3 Reporting period, frequency and contact point	Pages 8 – 9 (About this report)	-	-	-
	2-4 Restatements of information	There are no restatements in this year's report	-	-	-
	2-5 External assurance	This report has not been externally assured	-	-	-
	2-6 Activities, value chain and other business relationships	Pages 10 – 11 (About elm)	-	-	-
	2-7 Employees	Pages 70 – 77 (Talent Development and Retention)	-	-	-
	2-8 Workers who are not employees	Pages 70 – 77 (Talent Development and Retention)	-	-	-
	2-9 Governance structure and composition	Page 120 (Governance, Ethics and Accountability > Governance Structure) Pages 121 – 123 (Governance, Ethics and Accountability > Board of Directors)	-	-	-
	2-10 Nomination and selection of the highest governance body	Pages 121 – 123 (Governance, Ethics and Accountability > Board of Directors) Pages 124 – 126 (Governance, Ethics and Accountability > Board Election Criteria)	-	-	-
	2-11 Chair of the highest governance body	Pages 121 – 123 (Governance, Ethics and Accountability > Board of Directors)	-	-	-
	2-12 Role of the highest governance body in overseeing the management of impacts	Pages 121 – 123 (Governance, Ethics and Accountability > Board of Directors) Page 126 (Governance, Ethics and Accountability > Sustainability Governance)	-	-	-
GRI 2: General Disclosures 2021	2-13 Delegation of responsibility for managing impacts	Pages 121 – 123 (Governance, Ethics and Accountability > Board of Directors)	-	-	-
	2-14 Role of the highest governance body in sustainability reporting	Page 126 (Governance, Ethics and Accountability > Sustainability Governance)	-	-	-
	2-15 Conflicts of interest	PPages 121 – 123 (Governance, Ethics and Accountability > Board of Directors) Pages 127 – 128 (Governance, Ethics and Accountability > Whistleblowing Policy)	-	-	-
	2-16 Communication of critical concerns	Pages 126 – 127 (Governance, Ethics and Accountability > Whistleblowing Policy)	-	-	-
	2-17 Collective knowledge of the highest governance body	Page 126 (Governance, Ethics and Accountability > Board Election Criteria > Board and Committees Training and Assessment)	-	-	-
	2-18 Evaluation of the performance of the highest governance body				
	2-19 Remuneration policies	Page 128 (Governance, Ethics and Accountability > Key Policies)	-	-	-
	2-20 Process to determine remuneration	Page 131 – 134 (2025 Annual Report > Compensation and Remuneration)	-	-	-
	2-21 Annual total compensation ratio	-	-	Information unavailable / incomplete	Elm reports on the remuneration of the Board of Directors and the top five senior executives in its 2025 annual report. However, data on the median annual total compensation for all employees is not available, and therefore the annual total compensation ratio cannot be fully calculated.

GRI Content Index continued

GRI Standard	Disclosure	Location and/ or direct answer	Omission		
			Requirement(s) Omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-22 Statement on sustainable development strategy	Pages 18 – 19 (Message from the Chairman) Pages 20 – 21 (Message from the CEO)	-	-	-
	2-23 Policy commitments	Page 127 (Governance, Ethics and Accountability > Ethics, Conduct and Regulatory Discipline) Page 128 (Governance, Ethics and Accountability > Key Policies)	-	-	-
	2-24 Embedding policy commitments				
	2-25 Processes to remediate negative impacts	Pages 110 – 113 (Digital Excellence and Experience > Customer Centricity) Pages 127 – 128 (Governance, Ethics and Accountability > Whistleblowing Policy)	-	-	-
	2-26 Mechanisms for seeking advice and raising concerns	Pages 127 – 128 (Governance, Ethics and Accountability > Whistleblowing Policy) Pages 142 – 143 (Governance, Ethics and Accountability > Human Rights in the Value Chain)	-	-	-
	2-27 Compliance with laws and regulations	Pages 127 – 128 (Governance, Ethics and Accountability > Whistleblowing Policy) Pages 129 – 134 (Governance, Ethics and Accountability > Risk Management)	-	-	-
	2-28 Membership associations	Page 105 (Digital Transformation and Innovation > Strategic Partnerships)	-	-	-
	2-29 Approach to stakeholder engagement	Pages 40 – 41 (Stakeholder Engagement)	-	-	-

GRI Standard	Disclosure	Location and/ or direct answer	Omission		
			Requirement(s) Omitted	Reason	Explanation
Material Topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Pages 32 – 33 (Materiality Assessment > 2025 Materiality Review Process)	-	-	-
	3-2 List of material topics	Pages 34 – 35 (Materiality Assessment > Focus Areas)	-	-	-
	3-3 Management of material topics	Pages 34 – 35 (Materiality Assessment > Focus Areas) elm's material matters are listed as follows: ▪ Climate Change and Energy Use ▪ Sustainable Resource Management ▪ Talent Development and Retention ▪ Employee Health and Wellbeing ▪ Diversity, Equity and Inclusion ▪ Community Development and Digital Inclusion ▪ Digital Transformation and Innovation ▪ Customer Centricity ▪ Responsible AI ▪ Governance, Ethics and Accountability ▪ Cybersecurity and Data Privacy ▪ Human Rights in the Value Chain	-	-	-
Climate Change and Energy Use					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 54 – 59 (Climate Change and Energy Use)	-	-	-
GRI 102: Climate Change 2025	102-1 Transition plan for climate change mitigation	Pages 54 – 55 (Climate Change and Energy Use > Climate Risks)	-	-	-
	102-2 Climate change adaptation plan				
	102-5 Scope 1 GHG emissions	Pages 55 – 56 (Climate Change and Energy Use > Emissions management)	-	-	-
	102-6 Scope 2 GHG emissions				
	102-7 GHG emissions intensity				

GRI Content Index continued

GRI Standard	Disclosure	Location and/or direct answer	Omission		
			Requirement(s) Omitted	Reason	Explanation
GRI 103: Energy 2025	103-1 Energy policies and commitments	Pages 58 – 59 (Climate Change and Energy Use > Energy Performance)	-	-	-
	103-2 Energy consumption and self generation within the organization				
	103-5 Reduction in energy consumption				
Sustainable Resource Management					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 60 – 63 (Sustainable Resource Management)	-	-	-
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Page 63 (Sustainable Resource Management > Water Management)	-	-	-
	303-2 Management of water discharge-related impacts				
	303-5 Water consumption	Page 63 (Sustainable Resource Management > Water Management > Water Consumption)	-	-	-
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Pages 60 – 62 (Sustainable Resource Management > Waste Management)	-	-	-
	306-2 Management of significant waste related impacts				
	306-3 Waste generated				
	306-4 Waste diverted from disposal				
Talent Development and Retention					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 70 – 77 (Talent Development and Retention)	-	-	-
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Page 71 (Talent Development and Retention > Talent Acquisition and Retention Strategies)	-	-	-
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Pages 78 – 79 (Employee Health and Well-being > Comprehensive Benefits and Well-being Framework)	-	-	-
	401-3 Parental leave	Page 79 (Employee Health and Well-being > Parental Leave Support)	-	-	-
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Pages 70 – 75 (Talent Development and Retention > Training and Development Programs)	-	-	-
	404-2 Programs for upgrading employee skills and transition assistance programs				
	404-3 Percentage of employees receiving regular performance and career development reviews	Page 76 (Talent Development and Retention > Enhancing Employee Engagement)	-	-	-
Employee Health and Well-being					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 78 – 79 (Employee Health and Well-being)	-	-	-
GRI 403: OccupationalHealth and Safety 2018	403-1 Occupational health and safety management system	Pages 78 – 79 (Employee Health and Well-being)	-	-	-
	403-2 Hazard identification, risk assessment, and incident investigation				
	403-3 Occupational health services				
	403-4 Worker participation, consultation, and communication on occupational health and safety				
	403-5 Worker training on occupational health and safety	Page 78 (Employee Health and Well-being > Health and Safety)	-	-	-
	403-6 Promotion of worker health	Pages 78 – 79 (Employee Health and Well-being > Comprehensive Benefits and Well-being Framework) Page 79 (Employee Health and Well-being > Promoting Work-Life Balance)	-	-	-
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Pages 78 – 79 (Employee Health and Well-being)	-	-	-
	403-8 Workers covered by an occupational health and safety management system	Pages 78 – 79 (Employee Health and Well-being)	-	-	-
	403-9 Work-related injuries	Pages 78 – 79 (Employee Health and Well-being > Health and Safety)	-	-	-

GRI Content Index continued

GRI Standard	Disclosure	Location and/ or direct answer	Omission		
			Requirement(s) Omitted	Reason	Explanation
Diversity, Equity and Inclusion					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 80 – 85 (Diversity, Equity and Inclusion)	-	-	-
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Pages 80 – 85 (Diversity, Equity and Inclusion)	-	-	-
GRI 406: Nondiscrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Pages 127 – 128 (Governance, Ethics and Accountability > Whistleblowing Policy)	-	-	-
Community Development and Digital Inclusion					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 86 – 90 (Community Development and Digital Inclusion)	-	-	-
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Pages 88 – 89 (Community Development and Digital Inclusion > Digital Inclusion and Access)	-	-	-
	203-2 Significant indirect economic impacts				
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Pages 87 – 88 (Community Development and Digital Inclusion > Community Investment)	-	-	-
Digital Transformation and Innovation					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 96 – 105 (Digital Transformation and Innovation)	-	-	-
Customer Centricity					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 110 – 113 (Customer Centricity)	-	-	-
Responsible AI					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 106 – 109 (Responsible AI)	-	-	-

GRI Standard	Disclosure	Location and/ or direct answer	Omission		
			Requirement(s) Omitted	Reason	Explanation
Governance, Ethics and Accountability					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 120 – 135 (Governance, Ethics and Accountability)	-	-	-
GRI 205: Anticorruption 2016	205-1 Operations assessed for risks related to corruption	Pages 127 – 128 (Governance, Ethics and Accountability > Whistleblowing Policy > Governance performance)	-	-	-
	205-2 Communication and training about anti-corruption policies and procedures				
GRI 206: Anticompetitive Behavior 2016	206-1 Legal actions for anticompetitive behavior, anti-trust, and monopoly practices	Page 127 (Governance, Ethics and Accountability > Whistleblowing Policy > Governance performance)	-	-	-
Cybersecurity and Data Privacy					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 136 – 141 (Cybersecurity and Data Privacy)	-	-	-
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Page 138 (Cybersecurity and Data Privacy > Cybersecurity performance)	-	-	-
Human Rights in the Value Chain					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 142 – 143 (Human Rights in the Value Chain)	-	-	-
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Page 90 (Community Development and Digital Inclusion > Supply Chain and Local Content)	-	-	-
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Page 143 (Human Rights in the Value Chain > Human Rights in the Supply Chain)	-	-	-
	414-2 Negative social impacts in the supply chain and actions taken				

SASB Content Index

Sustainability Disclosure Topics & Metrics

Topic	Metric	Code	Reference
Environmental Footprint of Operations	(1) Total energy consumed (2) Percentage grid electricity and (3) Percentage renewable	TC-SI-130a.1	Pages 58 – 59 (Climate Change and Energy Use > Energy Performance)
	(1) Total water withdrawn (2) Total water consumed; percentage of each in regions with high or extremely high baseline water stress	TC-SI-130a.2	Page 63 (Sustainable Resource Management > Water Management)
	Discussion of the integration of environmental considerations into strategic planning for data centre needs	TC-SI-130a.3	Pages 54 – 59 (Climate Change and Energy Use)
Data Privacy and Freedom of Expression	Description of policies and practices relating to targeted advertising and customer privacy	TC-SI-220a.1	Page 140 (Cybersecurity and Data Privacy > Embedding Security and Privacy by Design)
	Number of users whose information is used for secondary purposes	TC-SI-220a.2	Information unavailable.
	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	TC-SI-220a.3	Information unavailable.
	(1) Number of law enforcement requests for customer information (2) Number of customers whose information was requested (3) Percentage resulting in disclosure	TC-SI-220a.4	Information unavailable.
	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	TC-SI-220a.5	Information unavailable.

Sustainability Disclosure Topics & Metrics

Topic	Metric	Code	Reference
Data Security	(1) Number of data breaches (2) Percentage that are personal data breaches (3) Number of users affected	TC-SI-230a.1	Page 138 (Cybersecurity and Data Privacy > Cybersecurity performance)
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	TC-SI-230a.2	Page 138 (Cybersecurity and Data Privacy > Cybersecurity performance)
Recruiting and Managing a Global, Diverse and Skilled Workforce	Percentage of employees that require a work visa	TC-SI-330a.1	Information unavailable.
	Employee engagement as a percentage	TC-SI-330a.2	Page 76 (Talent Development and Retention > Enhancing Employee Engagement)
	Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management, (c) technical employees, and (d) all other employees	TC-SI-330a.3	Pages 80 – 85 (Diversity, Equity and Inclusion)
Intellectual Property Protection and Competitive Behaviour	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations	TC-SI-520a.1	Information unavailable.
Managing Systemic Risks from Technology Disruptions	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime	TC-SI-550a.1	Pages 129 – 134 (Governance, Ethics and Accountability > Risk Management)
	Description of business continuity risks related to disruptions of operations	TC-SI-550a.2	Pages 54 – 55 (Climate Change and Energy Use > Climate Risks) Pages 134 – 135 (Governance, Ethics and Accountability > Business Continuity and Organizational Resilience)

Alignment with UN SDGs

Environmental Impact and Management



Target 6.4: increase water-use efficiency and ensure freshwater supplies



Target 12.2: sustainable management and use of natural resources
Target 12.5: substantially reduce waste generation
Target 12.6: encourage companies to adopt sustainable practices and sustainability reporting
Target 12.8: promote universal understanding of sustainable lifestyles



Target 13.2: Integrate climate change measures into policies and planning
Target 13.3: build knowledge and capacity to meet climate change

People and Community Empowerment



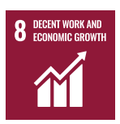
Target 3.4: reduce mortality from non-communicable diseases and promote mental health
Target 3.8: achieve universal health coverage



Target 4.3: equal access to affordable technical, vocational and higher education
Target 4.4: Increase The Number Of People With Relevant Skills For Financial Success
Target 4.5: eliminate all discrimination in education



Target 5.1: end discrimination against women and girls
Target 5.4: value unpaid care and promote shared domestic responsibilities
Target 5.5: ensure full participation in leadership and decision-making
Target 5.b: promote empowerment of women through technology



Target 8.2: Achieve higher levels of economic productivity through diversification, technological upgrading and innovation
Target 8.5: full employment and decent work with equal pay
Target 8.6: promote youth employment, education and training
Target 8.8: protect labour rights and promote safe working environments



Target 10.2: promote universal social, economic and political inclusion
Target 10.3: ensure equal opportunities and end discrimination
Target 10.4: adopt fiscal and social policies that promote equality



Target 17.7: promote sustainable technologies to developing countries
Target 17.17: encourage effective partnerships
Target 17.18: Enhance access to reliable data

Digital Excellence and Experience



Target 8.2: diversify, innovate and upgrade for economic productivity
Target 8.3: promote policies to support job creation and growing enterprises



Target 9.1: develop sustainable, resilient and inclusive infrastructures
Target 9.4: upgrade all industries and infrastructures for sustainability
Target 9.5: enhance research and upgrade industrial technologies
Target 9.b: support domestic technology development and industrial diversification
Target 9.c: universal access to information and communications technology



Target 11.2: affordable and sustainable transport systems
Target 11.3: inclusive and sustainable urbanization

Responsible Governance and Oversight



Target 12.7: promote sustainable public procurement practices



Target 16.5: substantially reduce corruption and bribery
Target 16.6: develop effective, accountable and transparent institutions
Target 16.B: strengthen national institutions to prevent violence and combat terrorism and crime





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