



**Alpha
Halal Fund**

Information Disclosure Policy

Version 1

c/o Global Alpha Capital Limited
P O Box 70166, **DAR ES SALAAM**

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ALPHA HALAL
FUND

1.0 Purpose and objectives

- 1.1 The Alpha Halal Collective Investment Scheme (**Alpha Halal Fund**) is committed to making information about its activities available to the public. **Alpha Halal Fund** considers public access to information a key component of effective engagement with all stakeholders, including Alpha Halal Fund's current and prospective Unitholders, Regulators and the public generally, in the fulfilment of its mandate. Public access to the Fund's information facilitates transparency and accountability and enhances trust in Alpha Halal Fund's activities.
- 1.2 This Information Disclosure Policy ("This Policy" and "this Policy") is intended to ensure that information concerning Alpha Halal Fund's activities is made publicly available, subject to the limitations set out in this Policy. To that end, this Policy explains principles, practices and procedures; and defines clear categories of information according to their status with regards to public disclosure.
- 1.3 Information held by Alpha Halal Fund is made available primarily through the Alpha Halal Fund website, the Fund Manager's websites and webpages of Alpha Halal Fund's partners.

2.0 Scope of this Policy

- 2.1 This Policy applies to all Information in the custody of Alpha Halal Fund. For the purposes of this Policy, "Information" means any produced content, in any medium (paper, electronic or sound, visual or audiovisual recording) concerning a matter relating to Alpha Halal Fund's activities.
- 2.2 This Policy does not apply to data collected by any of Alpha Halal Fund's Partner or Service Provider that is governed by the Partner or Service Provider's internal data sharing policies.
- 2.3 Information jointly owned with third parties, for example, memoranda of understanding, service agreements, and other contractual arrangements, will be made available on a case by case basis with the agreement of the parties concerned.

3.0 General principles of access to information

- 3.1 Information accessible to the public shall be made available, as far as reasonable and practical, through the Alpha Halal Fund website. An overview of information presently available to the public (or which is made available on an on-going basis) is listed in **Annex 1**.
- 3.2 This Policy is guided by the principles of openness and transparency, such that any information concerning Alpha Halal Fund is publicly accessible, or available upon request, unless one or more of the exceptions to the Policy, or another compelling reason, applies.

4.0 Categories of Information

- 4.1 Alpha Halal Fund is committed to open and transparent disclosure of information. Nevertheless, there are legal, operational and other practical considerations that are necessary to preserve the interests of the Fund and its Unitholders, as well as those of its staff and third parties with which Alpha Halal Fund collaborates. The application of these considerations has resulted in some exceptions to the principle of disclosure. As such, Alpha Halal Fund information is classified by reference to three broad categories: publicly available information, information available on request, and confidential information.

4.1.1 Category 1: Publicly available Information

Annex 1 sets out an overview of publicly available information (i.e. information which is available on the Alpha Halal Fund website).

4.1.2 Category 2: Information available on request

Alpha Halal Fund makes available certain types of information on request only. In some cases, limitations may apply with regard to the types of request or to Alpha Halal Fund information that will be made available. For example, Alpha Halal Fund's internal audit reports addressed to senior management are made available to Unitholders, regulators or external auditors upon request. In addition, restrictions (e.g. redaction of content) or conditions may be applied to the use of such information when made available on request. **Annex 2** sets out an overview of information available on request.

4.1.3 Category 3: Confidential information

Information identified as confidential by Alpha Halal Fund constitutes an exception to the principle of public disclosure. **Annex 3** provides an overview of information considered by Alpha Halal Fund to be confidential. The exceptions to disclosure reflect what is necessary to preserve legitimate public or private (including personal privacy) interests.

Decisions and resolutions of the Regulators, Board of Directors or the Shari'ah Advisory Board, may contain information disclosure limitations. Nothing in or relating to this Policy will be deemed in any way to limit or modify the application of decisions or resolutions of these governing bodies.

5.0 Procedure for submitting requests for disclosure of information

- 5.1 Any individual or entity may request the disclosure of Alpha Halal Fund's non-confidential information that is not otherwise available through Alpha Halal Fund public-access websites or web-pages of Alpha Halal Fund's hosted partnerships. Requests for disclosure of information should be clearly formulated and as specific as possible, and should identify the individual or entity making the request, the information being requested (with the title of the document, if known) and the time period covered by the request, where relevant.
- 5.2 Where the request for information is by or on behalf of a Unitholder, the person making the request shall include such information in the request as would allow Alpha Halal Fund to identify and respond directly to the respective Unitholder.
- 5.3 This Policy does not apply to data existing only in raw form, either physically or electronically. Alpha Halal Fund is not able to respond to requests that require the selection and/or manipulation of data to produce content.
- 5.4 Requests for disclosure of information must be submitted to the Fund manager by any one of the following channels:

- (a) **Physically at office:** 8th Floor, Millennium Towers-1, Makumbusho, Dar es Salaam;
- (b) **By post :** P O Box 70166, **14107** Dar es Salaam;
- (c) **By email:** info@alphacapital.co.tz

- 5.5 Alpha Halal Fund shall endeavour to process requests for disclosure of information as promptly as possible. Depending on the complexity of the request, Alpha Halal Fund will seek to respond to requests within 48 hours of receipt of the request. Alpha Halal Fund may charge a fee for requests for information, based on the estimated costs of retrieving and supplying the information requested, which will be communicated to the requestor and must be paid in advance. Alpha Halal Fund will refund the fee if the information requested is not provided. Alpha Halal Fund reserves the right to charge an additional fee in complex cases.
- 5.6 If a requestor is not satisfied with Alpha Halal Fund's response to a request for disclosure of information, they may request in writing for an internal review of Alpha Halal Fund's response. Requests for internal Alpha Halal Fund review should be submitted to the email address mentioned above. Such internal review will be carried out by the first level supervisor of the Alpha Halal Fund staff member who signed the initial response. Subject to the complexity of the request, Alpha Halal Fund will aim to respond within seven (7) days of receipt of the request for internal review.

6.0 Conditions

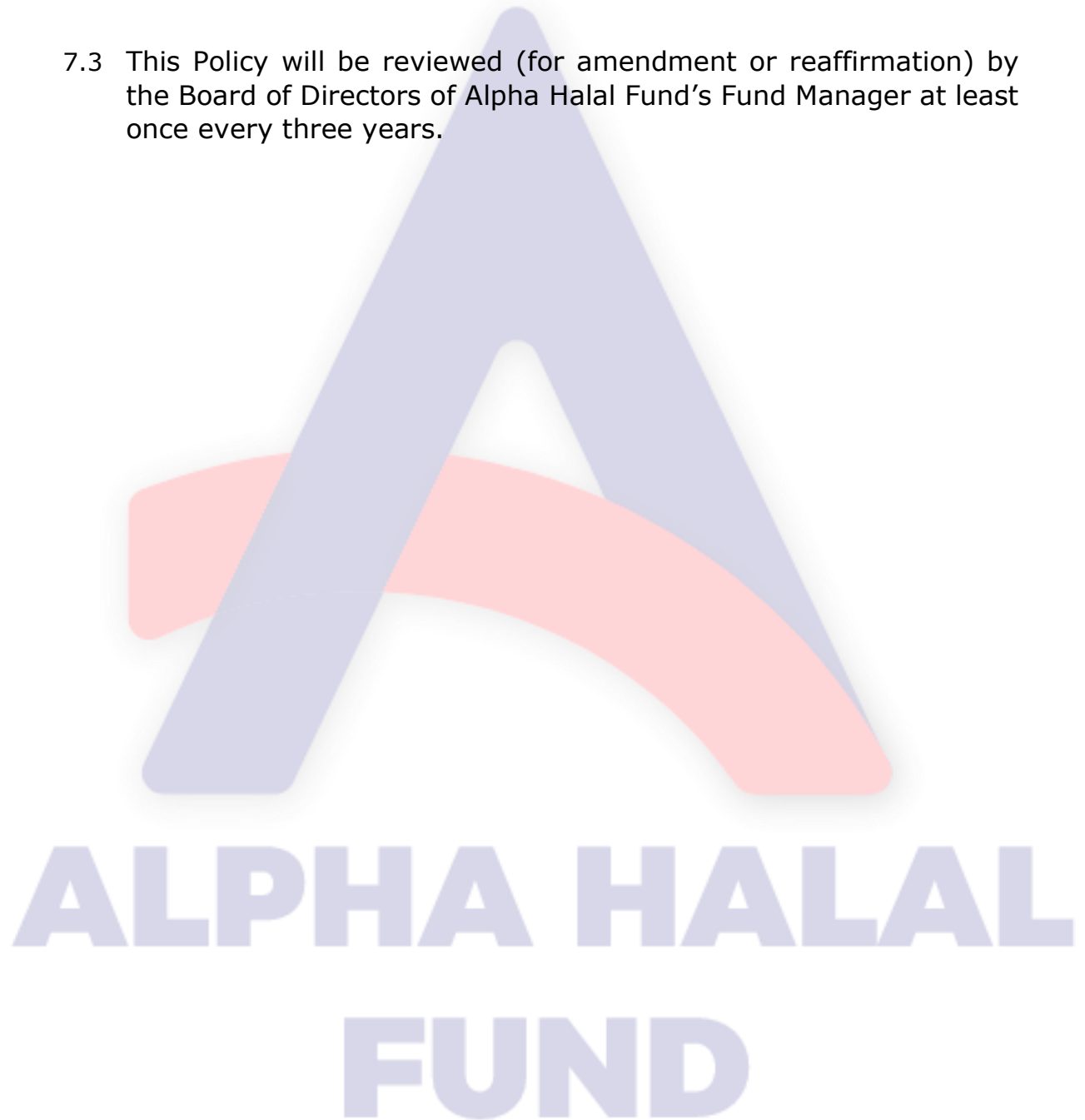
- 6.1 Alpha Halal Fund may deny a request for disclosure of information, in whole or in part, if any of the following situations apply:
- 6.1.1. If one or more of the limitations set out or referred to in this Policy or its Annexes applies;
 - 6.1.2. If the request is deemed by Alpha Halal Fund, in its sole discretion, to be an excessive demand upon Alpha Halal Fund's resources, i.e. requiring a significant amount of full time staff time, provided that this limitation shall not apply to a request by a Unitholder;
 - 6.1.3. If, in the judgment of Alpha Halal Fund, the request is unreasonable, repetitive, abusive or vexatious; or
 - 6.1.4. If the request is related to one or more similar request(s) that have been denied by Alpha Halal Fund.

- 6.2 If only part of the information that is responsive to a particular request for disclosure is subject to one of the limitations set out in this Policy or its Annexes, Alpha Halal Fund may decide, at its sole discretion, that the remaining part of the information, responsive to that request, will be disclosed. In such cases, Alpha Halal Fund will take appropriate measures to preserve the confidentiality of the information that is not disclosed.
- 6.3 The implementation of this Policy is subject to the intellectual property and other proprietary rights of Alpha Halal Fund and third parties, including but not limited to patents, copyrights, and trademarks, or non-disclosure agreements which may, inter alia, limit the right to reproduce, share or otherwise exploit information.
- 6.4 No representation is made or warranty given, express or implied, as to the completeness or accuracy of third-party-owned information made available by Alpha Halal Fund. Moreover, Alpha Halal Fund does not warrant that the use of any such individual component contained in the requested information will not infringe on the rights of those third parties. The risk of claims resulting from such infringement rests solely with the requestor/user. It is the responsibility of the requestor/user to determine whether permission is needed for any use of the information and to obtain permission from the copyright holder. In no circumstances will Alpha Halal Fund be liable for any direct or indirect loss arising from use of the information.
- 6.5 Nothing contained in or relating to this Policy, or done pursuant to it, shall be construed as a waiver of any of the privileges and immunities enjoyed by Alpha Halal Fund under national or international law, and/or as submitting Alpha Halal Fund to any national court jurisdiction. Without limiting the generality of the previous sentence, the disclosure of information in response to a request for disclosure, will not constitute a waiver, express or implied, of any of the rights and privileges of Alpha Halal Fund.

7.0 Entry into force and application of this Policy

- 7.1 This Policy shall enter into force on the date assigned by the Board of Directors of Global Alpha Capital Limited, the Fund Manager. It applies to information created or coming into Alpha Halal Fund's possession after its entry into force. This policy will be implemented progressively, subject revision by the Board.

- 7.2 Heads of Alpha Halal Fund Departments are responsible for ensuring compliance with this Policy, and for defining and periodically reviewing the classification of information for which they are responsible, in accordance with this Policy.
- 7.3 This Policy will be reviewed (for amendment or reaffirmation) by the Board of Directors of Alpha Halal Fund's Fund Manager at least once every three years.



**Overview of Alpha Halal Fund information available on
dedicated Alpha Halal Fund websites**

(“Publicly Available Information”)

1. Institutional information

- 1.1 About Alpha Halal Fund
 - 1.1.1 Constitutive documents
 - 1.1.2 Form of Shari’ah contract
- 1.2 The work of Alpha Halal Fund
 - 1.2.1 Investment Policy
 - 1.2.2 NAV
 - 1.2.3 Periodic Financial Results
 - 1.2.4 Geographic spread

2. Governance and Oversight

- 2.1 Governing Bodies (Fund Manager, Custodian / Trustee)
- 2.2 Shari’ah Advisor
- 2.3 Sharia Advisory Board
- 2.4 Shari’ah Advisor, Composition of Shariah Advisory Board,
- 2.5 Fund Manager, Custodian/Trustee, Legal Counsel, Auditor
- 2.6 Selling agent(s)
- 2.7 Independent Oversight
 - 2.7.1. Internal Compliance Officer
 - 2.7.2. Shari’ah Auditor

**Overview of types of ALPHA HALAL FUND information
available on request**

("Information available on request")

This comprises all remaining information which is not publicly available on the Alpha Halal Fund website (**Annex 1**), but is not classified as confidential information (**Annex 3**).

Access to some information in this category may be restricted to Unitholders only. This includes internal audit reports and reports of due diligence on other actors.

**ALPHA HALAL
FUND**

Overview of types of ALPHA HALAL FUND information considered to be confidential

("Confidential information")

Confidential information is not subject to disclosure.

The following categories of information are classified as "Confidential information":

1. Personal information

Alpha Halal Fund does not provide access under this Policy to information and documentation pertaining to either staff members or non-staff members performing Alpha Halal Fund work or holding Units of Alpha Halal Fund, including:

- (a) Private and employment-related information, including human resources records, medical records, salaries and benefits, personal communications;
- (b) Personal information received from individuals performing work for Alpha Halal Fund including technical and financial experts;
- (c) Information on staff appointment and selection processes;
- (d) Information on claims and internal conflict resolution proceedings;
- (e) Personal declaration of interest forms and related internal deliberations or similar issues submitted by Alpha Halal Fund staff members, as well as other individuals performing work for Alpha Halal Fund and experts participating in Alpha Halal Fund technical meetings;
- (f) Information about investigations of allegations of misconduct (other than as reported to Alpha Halal Fund Governing Bodies).

2. Security and safety

- (a) Information, the disclosure of which may endanger the life, health, safety or security of any individual, or
- (b) Information, the disclosure of which may violate the rights of any individual or to invade his or her privacy;
- (c) Information, the disclosure of which may endanger public security or prejudice the security or proper conduct of any operation or activity of Alpha Halal Fund;
- (d) Information, the disclosure of which may compromise the security and safety or commercial interests of any Alpha Halal Fund collaborators; or
- (e) Information, the disclosure of which may jeopardize Alpha Halal Fund property;

3. Information concerning Alpha Halal Fund Unitholders

Information, the disclosure of which may adversely affect Alpha Halal Fund's relations with any Unitholder or agent(s) thereof.

4. Information obtained or shared in confidence

- (a) Information received from or sent to a Unitholder, Investee or third parties under an expectation of confidentiality;
- (b) Information obtained in confidence from a government, non-governmental organisation, international organisation or other entity or person that would or would be likely to, if disclosed, compromise the Fund's relations with that party.

5. Confidential Internal documents

- (a) Internal email correspondence;
- (b) Internal reports, analyses, reviews, notes for the record of internal meetings or meetings with third parties, statistics prepared solely to inform Alpha Halal Fund's internal decision-making processes;
- (c) Internal policy, guidelines, standard operating procedures, unless otherwise decided;
- (d) Internal telephone directories;
- (e) Information pertaining to corporate administrative matters.

6. Deliberative information

- (a) Information concerning Alpha Halal Fund's own internal deliberations, communications (including internal interoffice or intra-office documents such as emails, memos, and draft documents);
- (b) Documents relating to the communications, deliberations and decisions of Alpha Halal Fund internal bodies and internal advisory committees;
- (c) Contributions to and deliberations of Alpha Halal Fund expert panels and committees, technical advisory groups, including communicators between Alpha Halal Fund and its experts or service providers;
- (d) Internal management documents produced by Alpha Halal Fund for the information of senior management including without being limited to internal briefings, reports, self-assessments, corporate risk register;
- (e) Communications of Member States' representatives and/or their offices;
- (f) Alpha Halal Fund's communications and deliberations with third parties and other entities with which the Fund collaborates, except where such collaboration is deemed to have an impact on the Fund's compliance with the Constitutive Document or Offer Document.

7. Privileged information

- (a) Information covered by legal privilege, or the disclosure of which may expose Alpha Halal Fund to legal risk;
- (b) Legal advice and requests for legal advice;
- (c) Information related to due process rights of individuals involved in internal audits and investigations;
- (d) Requests for ethics advice addressed to, and ethics advice provided by, any third party.

8. Financial information

- (a) Documents, analyses, correspondence or other information prepared for financial and budgetary transactions, or for the development of internal or external financial reports;

- (b) Banking or billing information of Alpha Halal Fund offices, Alpha Halal Fund's contractors and vendors (companies or individuals), including consultants.

9. Commercial information

- (a) Commercial information which, if disclosed, may harm either the financial interests of Alpha Halal Fund or those of third parties;
- (b) Information relating to Alpha Halal Fund's procurement processes, except that covered in Annex 1, paragraph 5, such as information submitted by prospective bidders, tenders, proposals or price quotations;
- (c) Information relating to the Alpha Halal Fund Pre-Qualification of Vendors (PQV), including but not limited to information and data submitted by such bidders;
- (d) Information that is subject to obligations of confidentiality or non-disclosure pursuant to confidentiality agreements or other contractual or legal obligations of the Fund or which could, if disclosed, expose the Fund to legal risk or violate applicable internal regulations, rules and procedures.

10. Other

- (a) Other kinds of information, which because of its nature, content or the circumstances surrounding its creation, use or communication is deemed confidential in the interests of Alpha Halal Fund or third parties;
- (b) Passwords, pins and other access codes for Alpha Halal Fund systems.

Disclaimer:

This list is not exhaustive, and other types of information may need to be added to the category of Alpha Halal Fund Confidential Information.