Name: Nael Salah

Address: 233 Al Madina Al Munawara Street, Amman, Jordan

**Your Past and Current Relationship with ESKADENIA**

Founder and Managing Director of ESKADENIA Software since its establishment in July 2000.

**Your Past and Current Relationship with ICIEC**

ICIEC is one of the Insurance customers of ESKADENIA Software.

**Describe the Background Qualifications Training Professional experience**

**Current Position:** Managing Director and Chairman, ESKADENIA Software, since 2000.

**Education:** BSC in Electronic Engineering from the University of Liverpool, England.

**Professional Experience:**

1978 to 1983 Senior Telecom Engineer at Etisalat UAE,
1983 to 2000 Ericsson Sweden various positions ending with Corporate Vice President,
2000 to date Managing Director of ESKADENIA Software.

ESKADENIA Software is one of the most successful and reputable software companies in Jordan. The company started to work in Insurance Software products directly upon establishment in the middle of 2000 and is considered today as the leading Arabic provider of Insurance Systems. We have always delivered on our promises and have never had any legal dispute with any of our insurance customers.

Our first contact with ICIEC came in the beginning of 2016 when ICIEC sent ESKADENIA Software, an RFP with the aim of replacing the existing Credit Insurance and other Software Systems with new ones. ESKADENIA declined to take part in the tender due to the lack of a readily available Credit Insurance System at the time. The ICIEC CEO expressed his disappointment that ESKADENIA did not want to participate in the RFP to our representative Shadi Saadeh at the General Arab Insurance Federation conference in Beirut in May 2016 who conveyed the message to me.

The RFP was reissued in the beginning of 2017 and after internal deliberations we decided not to participate as in addition to the fact that ESKADENIA did not have a Credit Insurance System, we knew that the Credit Insurance System being used at ICIEC was developed and maintained by software developers within the ICIEC IT Unit and that this unit will be heavily involved in the project. Resistance to change is one of the most common reasons for the failure of software projects and as the ICIEC IT staff will manage the project, we were concerned that this replacement could be difficult.

The ICIEC CEO contacted me by phone and strongly asked me to participate and to put our conditions in terms of time plan, payments, and price and he promised to facilitate good cooperation with his IT team.

ESKADENIA decided to participate after having verbal assurances that an ICIEC Project Manager will have a mandate to facilitate the systems replacements as we received assurance from the ICIEC CEO that he is willing to cooperate with ESKADENIA based on his positive experience with ESKADENIA when he was the CEO of WATANIA Insurance Company of Abu Dhabi when he contracted ESKADENIA to deliver Insurance Software Systems. It is worthwhile mentioning that these systems are still in operation at WATANIA and that frequent updates have been made to the WATANIA systems throughout the past 15 years.



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ESKADENIA assembled a competent insurance business team and started to evaluate and study the Credit Insurance business of both ICIEC and the international market and to see how we can utilize significant existing modules of the Insurance Systems we already have for all other lines of insurance business such as General, Medical, Motor, Travel, Group and Individual Life Insurance Systems.

The agreement with ICIEC took a long time to finalize as the ICIEC's project evaluation team carried out a thorough due diligence process. During this almost 2 years period, ESKADENIA developed the first version of the Credit Insurance System before signing the agreement with ICIEC on 18th February 2019. This initial release was used for system demonstrations and helped to identify the additionally requested ICIEC business features after the project agreement was signed.

The signed Agreement included many other systems that were readily available at ESKADENIA but needed minor customization as is normally done for most projects. ESKADENIA and ICIEC signed the License Agreement for a total of 13 Systems and the Services Agreement needed to implement these systems. ESKADENIA normally signs one agreement for both the software licenses and the Implementation Services, but ICIEC asked us to separate the two and we accepted. It is of importance to also mention that the signed agreements stated that both parties will agree on the project duration during the project execution.

The activities of the project started in April 2019. The first project meeting took place at the ICIEC Premises on the 7th of April 2019, and the ESKADENIA staff stayed on premises for around a month and then both teams continued to work on the Scope Definition for a period of more than 2 months. The first Credit System Business Requirement Document (BRD) was ready and shared with ICIEC at the end of June. The ESKADENIA team traveled to ICIEC on the 7th of July to present the Credit Insurance BRD and the Credit System interfaces as developed by ESKADENIA. Many of the contracted systems such as WAKALA Takaful, Business Intelligence, Audit Trail, Logging etc. were accepted as is without any customization and a few other had minor customizations. It is worthwhile to mention that the ESKADENIA team convinced ICIEC to use the concept of "Endorsements" a process that documents the changes of any issued and / or finalized insurance policy, a method that was not used in the old ICIEC system.

ESKADENIA started the development of the captured Gap between our products and their requirements, or the need for Customization of the developed Credit Insurance System at the end of July 2019 but continued to discuss and work on the Scope with ICIEC for 2 additional months until the end of September. ICIEC sent updated Operational Manuals and Business Processes at the end of September, and the ESKADENIA team agreed to include them in the Scope. The updated Scope Document was shared with ICIEC on the 4th of November 2019, for their feedback and approval and ICIEC requested changes on certain functions such as NPL and Claims and requested to review the Reinsurance module one more time.

ESKADENIA provided an updated Credit System BRD that includes the changes requested on Reinsurance and shared the new version with ICIEC in the first week of December. In the second week of December, ICIEC asked to include 29 additional new reports in the BRD document. ICIEC shared the feedback of its business staff on the Credit Insurance BRD and the Business processes in the first week of January 2020. The ESKADENIA and ICIEC Underwriting, Risk Management and Finance teams had 3 conference calls in the 3rd week of January 2020 to go through their comments shared on the credit documents. ESKADENIA agreed to share the updated Credit BRD & Business Processes documents before the end of the second Week of February 2020.

ICIEC business users requested additional requirements that need software development from the ESKADENIA side. A meeting was held in the first week of February 2020 where the ESKADENIA team stated that there is a risk of Scope Creep in the project. The updated credit insurance BRD v6.0 and business processes v4.0 were shared with ICIEC on the 9th of February, and a meeting took place on the 13th to discuss the new ICIEC requirements. A financial analysis sheet was presented for the first time in a conference call held on



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Sunday 16th of February 2020. The development that contains all ICIEC requirements was ready for testing at the time, and ESKADENIA considered these new requirements as part of the Risk and Assessment Management System.

I was officially informed, that a conference call was held between Mr. Ahmad Samara & Mr. Mohamad El-Sayed on Sunday 23rd of February 2020 where ESKADENIA asked the possibility of commencing the Gap Verification sessions for the Credit Insurance System on the first of March and ICIEC confirmed the request and asked ESKADENIA to provide the sessions agenda. The ESKADENIA Project Manager Laisan Mubeideen asked for the ICIEC approval on the updated Credit BRD and Business Processes as soon as possible and prior to conducting the Gap Sessions Phase. The verification sessions agenda was shared by the ESKADENIA Project Manager Laisan Mubedeen with ICIEC.

The Credit BRD v7.0 and the Credit Business Processes v5.0 were signed by ICIEC & ESKADENIA in the last week of February 2020, and all scope documents were approved and shared between both parties. It basically took both teams a year to agree on the initial Scope of the project.

The Gap Verification of the original signed scope document started in the first week of March and continued onsite for 2 weeks. The ICIEC Project Manager agreed to consider the Installation Milestone as "achieved" upon the completion of the Gap Verifications sessions.

ICIEC mother company the Islamic Development Bank, decided on the 10th of March 2020 to stop onsite meetings and consultants' entry to the ICIEC premises due to the COVID pandemic, Saudi Arabia & Jordan decided to suspend all flights in both countries and announced state of emergency in Jordan, and a Curfew was applied in both countries. The ESKADENIA implementation team working at ICIEC caught one of the last flights to travel back to Jordan. ICIEC & ESKADENIA agreed to continue the Gap Verification sessions remotely.

Two conference calls were conducted on the 17th and 19th of March with the ICIEC IT team to discuss the production environment. Data migration sheets clarification sessions were scheduled to be conducted remotely for the remaining migration sheets [Commercial Production Declaration, Sovereign Production, Claims, Reinsurance] on 5th & 6th of April.

The Provisional Acceptance Form was shared with ICIEC in the middle of April to acknowledge the completion of system installation and Gap Verification activities. The 13 contracted systems including the agreed Customization Items were installed at the ICIEC test environment and were presented to the ICIEC IT team by ESKADENIA product owners on the 23rd of April 2020.

5 discussion sessions were conducted during the last week of April and first week of May with ICIEC to discuss the new ICIEC requirements under the [Credit Insurance, Reinsurance, Agent Portal, Customer Portal] Verification Logs. ICIEC decided to conduct internal sessions to discuss all items to classify the new list of points and arrange for additional sessions with ESKADENIA.

Many Verification Logs discussion sessions were held between the 10th and 28th of May and after estimating all development needed efforts for the Verification Log new out of the agreed scope required points by the "Project Change Control Board", the efforts will be considered under the project schedule and project activities will be re-scheduled and re-baselined. A decision was made by ICIEC that the Training Phase shall commence after completing the Development & Verification activities of the new functional requirements.

Change Request 1/2020 was signed by ICIEC on the 25th of June 2020 for a total of 308 Man Days of work and the development of the new requested requirements along with a free of charge long list of additional ICIEC requirements started. The Data Migration preparation continued in parallel with the CR 1 development. A new Milestone was also achieved as the project Provisional Acceptance was signed by ICIEC & ESKADENIA Project



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Managers on the 15th of July 2020. ICIEC decided to prepare the Production Environment to be ready to go Live which was decided to take place on the 3rd of January 2021 and the ESKADENIA team worked on preparing the Production Environment during July and August.

CR 1 was ready for testing at the end of August, and the CR Verification Sessions started on 31 of August and were planned to end on 7th of September to cover the Financial System, Credit Insurance, Customer Portal, Agent Portal and Banc-assurance sessions. A few verification points were, however, deferred to the middle of September.

The Training sessions for the ICIEC IT team started on the 17th of September and continued until almost the end of October. ICIEC requested a review of all the Credit Insurance products before commencing business users' training. The products Revision Sessions continued from 11th to the 25th of October before the training for business users will start. The ICIEC CEO requested to limit the training of business users to be 3 hours per day and to also apply that on the UAT sessions.

The ICIEC CEO & Project Manager decided on the 26th of October 2020 that the credit insurance products cycle Revision Sessions shall continue, and the final log sheet should be shared to discuss the showstopper points (whether they were under the scope or not) to be delivered before commencing the business users training sessions. ICIEC will continue the credit products revision sessions based on request to ensure the products cycles are complete under both Credit System & Business Channels.

The Credit Insurance System Revision Sessions continued until the middle of November while those for the Portals continued until the 3rd of December. The Financial System log sheet was shared by ICIEC at the end of December and the Log Sheet for the Credit Insurance System was shared in the first week of January 2021. The Data Migration activities were still being worked in parallel to the Revision Sessions.

ICIEC asked for an estimation for all the additional out of scope points requested during the Credit, Financial and Channels Systems Revisions Sessions and stressed that the integration with the RCL System must be delivered before going live. The new requirements were studied and analyzed, and a new Change Request CR 1/2021 was prepared and signed on the 28th of March 2021 for a total of 259 Man Days of work excluding the RCL integration that was deferred to a later stage. ESKADENIA started to work on the development of the additionally requested requirements in the Change Request and delivered around 99% of the CR points by beginning of June 2021. The teams were working on the Data Migration, Training, and User Acceptance Test of the systems in parallel to the CR development and verifications work. The 9 months ahead from June 2021 to March 2022 witnessed a range of activities such as ICIEC staff Training, UAT, discussion on integrations points with RCL, etc., a long list of minor and medium scale ICIEC requirements were developed in the systems free of charge, major new requirements, definitions of new Reinsurance treaties etc. This period was characterized by the lack of will from the ICIEC side to go live with what has been developed and delivered.

WE received a letter on the 6th of March 2022 from the ICIEC CEO expressing his dissatisfaction with the delays in going live and we responded by informing him that we could go live with all systems by early June if ICIEC decides to take all the contracted systems into live operation and that the cause of the delays is the insistence of the ICIEC team to have new systems' business requirements before going live. The ICIEC team insisted however to go ahead with a third Change Request for a long list of new requirements that needed 680 days of development efforts which is more than double the man days of the previous 2 CRs combined, it is worthwhile to mention that the CR included a long list of free ICIEC requirements at no cost. We also stated in the letter that ESKADENIA is exerting much more man days in this project than planned and that we should be entitled for compensation. ICIEC signed Change Request 1/2022 on the 28th of June 2022 for a total of 680 Man Days. Parallel to the Change Request Development work, our team worked on Data Migration, Systems familiarization and UAT and it was at this time obvious that these activities needed multiples of the contracted man days and

what is normally required for similar projects. The Change Request development was ready by end of October. The work on the Data Migration and UAT became very slow as the huge development efforts, limited time available by the ICIEC staff and continuous open ended scope creep by the ICIEC users. The ESKADENIA staff were under pressure to develop an uncontrollable number of additional requirements made the situation worse and ESKADENIA requested a period of 6 weeks in January of 2023 to focus on quality assurance of the systems. The tested systems were deployed at ICIEC Azure Test server during the week of 26th of Feb 2023. The project has now been open for 4 years which is unhealthy.

An activity driven by ICIEC aimed at yet another verifications exercise of the Credit Insurance and Channels Systems including all the 3 signed CRs started at the beginning of March 2023. The ICIEC & ESKADENIA managements had a meeting at ESKADENIA premises on the 23rd of March, and a decision was taken to go live with the systems by the 3rd of July 2023. A Project Time Plan endorsed by the ESKADENIA Business Units Managers was prepared for all needed activities needed to go live by July, the plan was shared with ICIEC and the activities started in March. The progress was much slower than anticipated as the ICIEC team did not allocate enough time for the verifications, insisted on doing lengthy full system cycles instead of seeing that the additional requirements are done, insistence on development of additional requirements during the process and halting the work whenever a bug is discovered until it is fixed. It took until the end of August to reach a 95% verification while the ESKADENIA and ICIEC staff had disagreements on the remaining points. The parties agreed in October 2023 on a new date to go live, the 1st of January 2024.

ICIEC decided however and insisted at the end of 2024 to order another Change Request for a yet another new list of requirements and ICIEC signed Change Request 1/2024 on the 20th of February 2024 for a total of 1,237 Man Days of development. The Change Request involved almost twice as much as the 3 previous Change Requests combined. We strongly tried to convince ICIEC to go live with what we have and defer additional requirements to after going live but to no avail.

The Development Progress of the 2024 CR reached 100% by June 2024 and the overall CRs Verification 95.9% with CR 01_2020: 100%, CR 01_2021: 95%, CR 01_2022: 99.4% and CR 01_2024: 80.6 %. ESKADENIA and ICIEC continued to work on the remaining points verification albeit at a very slow pace due to the little time allocated by the ICIEC team on this matter.

The CRs points Verifications went from June 2024 forward into a stalemate with the ICIEC IT team allocating very little time to view the points. We had a disagreement on 17 out of a total of 462 points where ICIEC required and insisted on a different scope than was originally described and agreed. They started to talk about a list of new requirements and insisted that these should be done Free of Charge.

The CRs Verification and Data Migration activities were finally concluded in April 2025 with a 100% completion from ESKADENIA's perspective. There were, however, several new points that need considerable development raised during the CRs Verification & Data reconciliation activities. ESKADENIA insisted that these are new requirements that are not covered by the 4 Change Requests and that we should go live with the project ahead of any additional development Change Request. The ICIEC IT team insisted on the other hand that these new points should be developed free of charge and made available to ICIEC before going live.

Throughout this very long project time, ESKADENIA spent thousands of man days above what was contracted and we requested payment of these days but the official response from ICIEC was that the project is turnkey and is fixed price. The ICIEC CEO visited the ESKADENIA exhibition in February of 2024 during the General Arab Insurance Federation Conference in Oman and while we were posing for a photograph, he whispered in my ear that the signed agreement does allow for payment of additional man days. I sent a letter to the ICIEC CEO a few weeks after the conference asking for compensation only to receive a letter that states that the agreement does not allow for payments of additional man days.



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The Language you will use in the Oral Testimony is Arabic and English.

**Declaration of Truth and Accuracy**

I hereby declare and confirm that all information, statements, and representations provided herein are **true, accurate, complete, and correct to the best of my knowledge and belief**. I further confirm that I have not knowingly omitted, concealed, or misrepresented any material information relevant to this statement. I accept full responsibility for the truthfulness, accuracy, and completeness of the information provided and acknowledge that the arbitration tribunal may rely upon such information for the purposes for which it has been provided.

Date: 5/11/2026 Signature: Nael Salas