- **Name**: **Laisan Al-Mobaideen**
- **Address: Al Madina Al Munawara St. 233 Amman Jordan**
- **Your Past and Current Relationship with ESKADENIA**

I was employed at ESKADENIA Software as a Business Analyst in 2015 and was promoted to a Project Manager at the Insurance business unit since 2017. I took an additional role as the Insurance Configuration Manager from 2016 to 2022.

- **Your Past and Current Relationship with ICIEC**

I served as the Project Manager for the ICIEC project from 2019 until 2025, my relationship with ICIEC up to 2025 was professional and related to my responsibilities as Project Manager. I was involved in managing the project from initiation, planning and monitoring and controlling the execution activities (scope definition, development (customization), testing, data migration, and deployment activities including installation, gap verification, training and UAT). In addition to managing the requested and signed change requests (CRs) by ICIEC.

- **Describe the Background Qualifications Training Professional experience and your present position as relevant to the dispute or to the contents of the statement**

- **Current Position:** Project Manager, ESKADENIA Software, since 2017.
- **Education**: I hold a Bachelor of Science (B.Sc.) in Computer Engineering in 2010 from The University of Jordan, Amman, Jordan.
- **Professional Certifications:**
  - ✓ Project Management Professional (PMP) certification, awarded in 2020.
  - ✓ ITIL Foundation Certificate in IT Management, awarded in 2012.
- **Professional Experience:**

  I have over 16 years of professional experience, including more than 9 years of experience in project management.

  - ✓ March 2017 to Present – Project Manager at ESKADENIA Software
  - ✓ April 2016 to 2022 – Additional Role (Insurance Configuration Manager) at ESKADENIA Software
  - ✓ October 2015 to February 2017 – Insurance Business Analyst at ESKADENIA Software
  - ✓ October 2014 to September 2015 – Senior Professional Services at ITG Jordan
  - ✓ October 2010 to October 2014 - Professional Services Officer at ITG Jordan

  At my current position as a Project Manager, I drive the activities for the project initiation, planning, monitoring, and controlling of project execution covering key activities including (requirements gathering and scope definition, development (customization), testing, data migration, and deployment activities including installation, gap verification, training and user acceptance test (UAT)) and project closure. Responsibilities also include coordination of project resources, risks and issues management, facilitating communication between stakeholders and project teams, monitoring and reporting project activities status and progress, and managing and documenting project meetings and progress reports to ensure effective project delivery.

From 2016 to 2022, in addition to my other responsibilities, I served as Insurance Software Configuration Manager at ESKADENIA Software. In that role, I was responsible for configuration management governance activities within the Insurance Business Unit, including process compliance and continuous process improvement.

Prior to becoming a Project Manager, I worked as an Insurance Business Analyst at ESKADENIA Software from 2015 to 2017. In that position, I provided business analysis and consultation services, collaborated closely with customers and project teams to identify and analyze business requirements, support solution design, and ensure alignment between business needs and system capabilities.

- **Your statement of the facts (testify here, distinguishing between facts personally known to you, facts based on information and belief BUT identifying by exhibit number every document related to fact you referred to.**

The following are based on my professional knowledge and involvement in the project,

1. Project Initiation and Planning

- Project Kick-off Meeting
  - ✓ I conducted the project kick-off meeting at ICIEC premises on 07 Apr 2019 with the ICIEC project team and have prepared and circulated the minutes of the meeting. During the kick-off meeting, we presented the project schedule, phases, deliverables, and planned activities, including key milestones. We also presented the schedule for the requirements-gathering and gap-analysis sessions.
  - ✓ We highlighted the key identified project risks and their corresponding preventive actions to ensure smooth project execution and effective project control.
  - ✓ One of the key risks highlighted during the meeting and documented in the kick-off meeting minutes was "Changes to the Approved Gap Scope Documents," which was assessed as having a “High” impact on the project. The preventive action was to defer any requested changes out of the scope and address them through formal Change Request (CR) orders for implementation after Go-Live.
- Project Charter
  - ✓ I developed and circulated the Project Charter, which was reviewed internally by ESKADENIA project team and by ICIEC Project Manager. The final version was signed on 11 April 2019.
  - ✓ The Project Charter covered various aspects of the project, including, but not limited to, the executive summary, business needs, project and product definitions, out-of-scope items, key project milestones and delivery approach, known risks with their preventive actions, key dependencies, assumptions from both ESKADENIA and ICIEC, and project constraints.
  - ✓ Under the signed project charter, we’ve highlighted that any additional requirements (gap) that are out of the signed scope documents will be considered as a Change Request and shall not be linked with the systems provisional or project final acceptance.
  - ✓ Under the Risks section, detailed preventive actions were mentioned to address each risk, emphasizing that any changes to the signed scope shall not affect any acceptance under the project

- ✓ Under the assumptions section, the project overall all assumptions and the expectations from ESKADENIA and ICIEC were documented; The gap shall be developed from ESKADENIA as stated in the signed scope documents. and we mentioned that in case of any delay that exceeds the project total man days and is caused by ICIEC; ICIEC will be charged the agreed-upon number of extra man-days as per the signed agreement. including requesting changes on the approved gap scope document.

- The Project Schedule and Plans

  - ✓ The project schedule was initially developed during the initiation phase and going live milestones were set in 3 phases; phase 1 on 02 Feb 2020, Phase 2 on 05 Apr 2020 and phase 3 on 01 Jun 2020.
  - ✓ Project plans - not limited - to communication, configuration management, training, validation & verification, project management were developed and maintained throughout the project implementation lifecycle.
  - ✓ During the project implementation and due to the requested changes, several updates were applied to the project schedule to reflect the impact on the project timeline and going live, in response to these requests (changes), ESKADENIA allocated additional technical and business resources to expedite the development and delivery of the requested changes. In good faith and to support the project's success, with several changes were developed and delivered at no additional cost to ICIEC.
  - ✓ ICIEC continued to introduce new requirements beyond the agreed scope, making the previously planned schedules unachievable. Furthermore, project activities, including UAT and go-live preparations, could not proceed as planned due to ICIEC's decisions to postpone or suspend these activities due to the additional requested changes.
  - ✓ Consequently, the repeated introduction of out-of-scope requirements and the resulting delays in resuming project activities significantly impacted the original and the subsequently revised project schedules (especially for the UAT and going live), as well as the planned go-live milestones.

2. Project Execution

- Original Scope Definition and Sign-off During the period from Apr 2019 – Mar 2020

  Requirements gathering and gap analysis sessions conducted with ICIEC teams onsite at ICIEC premises and offsite and the scope of the needed requirements were defined, documented, reviewed with ICIEC, updated and finally approved and signed under the Business Requirements Documents (BRDs), Business Processes and Gap Scope Documents, onsite sessions were planned to review the prepared scope documents in Jul 2020, the sign-off was obtained on 12 scope documents as follows:

  - ✓ Credit Insurance Business Requirements Document (BRD) & Business Processes (BP) Document – [Feb 2020 - Mar 2020]
  - ✓ Agent Portal BRD and Business Processes Documents – [Dec 2019]
  - ✓ Bancassurance Portal BRD and Business Processes Documents - [Dec 2019]
  - ✓ Customer Portal BRD and Business Processes Documents - [Dec 2019]
  - ✓ CRM & IMS Gap Scope Document - [Dec 2019]
  - ✓ Financial Integration with (SAP, Reuters & SWIFT) Document – [Dec 2019]
  - ✓ Financial Gap Scope and Financial Processes Documents - [Dec 2019]

- Customization and internal testing were initiated by ESKADENIA, and the delivery was completed in accordance with the approved and signed scope documents, including the BRDs, BPs, Financial Integration and Gap Scope Documents.

- Installation; In Feb 2019, the systems including the developed gap as per the signed scope documents were deployed at ICIEC test environment.

  Installations were also performed at ICIEC production environment and based on ICIEC requests the environments were changed and ESKADENIA did the needed configurations to account for these changes.

  Active Directory Integration was performed and also configured at ICIEC production environment.

- Gap verification sessions & COVID 19 Announcement; gap verification sessions performed to ICIEC team on the developed gap in accordance with the signed scope documents.

  - ✓ Seven of ESKADENIA resources were onsite in KSA to facilitate and perform the gap verification sessions starting 01 Mar 2020.
  - ✓ COVID 19 – Onsite visits cancellation while ESKADENIA team were onsite: On Friday 13 Mar 2020, ICIEC has shared with ESKADENIA the official Memo by IsDB - Business Continuity Management “4th BCM Circular on COVID-19 to All IsDB Group Staff in HQs and Regional Hubs”, Point 2 & Point 3 of the Memo stated to cancel all meetings, gatherings, events of any kind and to disallow any visitors from accessing the premises and cancel all kind of visits.
  - ✓ Due to the above official Memo shared and the pandemic-related circumstances in both countries (Jordan & KSA) It was agreed with ICIEC to continue the sessions remotely and the schedule was shared and performed accordingly until the end of Mar 2020; additional sessions were conducted afterwards to close the discussions and the remarks raised by ICIEC.
  - ✓ The verification log sheet was prepared based on the conducted sessions and the received remarks from ICIEC team. The remarks were classified including change requests (new requirements) and changes at no extra cost to ICIEC in addition to other classifications.
  - ✓ Based on the verification log results, the first CR was signed in 2020.

- Delivery and Acceptance of System Installation of all solutions in scope.

  Installation orientation session was conducted with ICIEC team on 23 Apr 2020 and The project provisional acceptance was signed by ICIEC on 15 Jul 2020, stating and confirming the following,

  “ESKADENIA has installed the contracted systems at ICIEC test environment, and has performed the below activities:

  - ✓ All contracted systems – 13 systems - were installed at ICIEC test environment: [Credit Insurance, Financial System, CRM/ IMS, Wakala, Approval & Notification, DMS, Workflow, BI, Logging, Audit Trail, Customer Portal, Agent Portal, and Banc-assurance].
  - ✓ The setup of the main systems [Core setup, Credit Insurance, Financial System, CRM/IMS, Business Channels] were defined on-site.
  - ✓ Gap verification sessions conducted to ICIEC business users based on the approved gap scope documents, business processes & business requirements documents.
  - ✓ Gap verification sessions Minutes of Meetings were shared with ICIEC for all of the conducted sessions.

- ✓ Gap verification sessions log sheets were shared with ICIEC for the following systems [Financial System, Credit Insurance, Customer Portal, Agent portal, and Banc-assurance].
- ✓ The gap verification results [Enhancements, Signed Change Request, Setup] will be implemented as agreed except for the cancelled points.
- ✓ Based on the provisional acceptance, the teams from both parties can arrange for the deployment at ICIEC production environment in order to proceed with data migration activities, and training activities can be arranged for as well."

- Setup configurations performed on all systems as per ICIEC needs.
- The Knowledge Transfer (Training) Acceptance:
  - ✓ The training sessions were conducted remotely from September to November 2020 due to the COVID-19 pandemic.
  - ✓ Training sessions on all contracted systems including CR 01_2020 were conducted in accordance with the agreed training plan and training syllabuses, which were shared with ICIEC. The training syllabuses were signed by ICIEC, and Training Effectiveness Surveys were completed by ICIEC at the conclusion of the training sessions for each system.
  - ✓ Training Acceptance was obtained and signed by ICIEC on 12 December 2021.
  - ✓ Training log sheet also prepared which included ICIEC team remarks where new changes were requested.

- User Acceptance Test (UAT) Sessions:
  - ✓ The UAT sessions were conducted remotely due to the COVID-19 pandemic. Additional sessions were also conducted to revalidate previously tested scenarios, as detailed below.
  - ✓ The UAT scenarios for each system, along with the corresponding results, were shared with ICIEC after the conducted sessions.
  - ✓ UAT activities for the Credit Insurance system and portals were subsequently paused by ICIEC, primarily due to the introduction of additional requirements beyond the agreed scope.

System	UAT Status	Notes
Core Administration	**Conducted**	*UAT Failed scenarios were re-validated (Passed) on 22.05.2022*
DMS	**Conducted**	*UAT Failed scenarios were re-validated (Passed) on 03.11.2021*
Workflow	**Conducted**	
Logging	**Conducted**	*UAT Failed scenarios were re-validated (Passed) on 21.09.2021*
Audit Trail	**Conducted**	*UAT Failed scenarios were re-validated (Passed) on 21.09.2021*
Analytics (BI)	**Conducted**	*UAT Failed scenarios were re-validated (Passed) on 21.09.2021*
Approval & Notifications	**Conducted**	*UAT Failed scenarios were re-validated (Passed) on 23.05.2022*
Financial System	**Conducted**	
Credit Insurance	**Paused as per ICIEC request**	
CRM & IMS	**Conducted**	*All scenarios (Passed) 26.05.2022*
Customer Portal	**Paused as per ICIEC request**	*Additional sessions needed to conclude the UAT*
Agent Portal	**Paused as per ICIEC request**	*Additional sessions needed to conclude the UAT*

Banc-assurance Portal	**Paused as per ICIEC request**	*Additional sessions needed to conclude the UAT*
Wakala	**Conducted**	

- The data migration landscape approach was shared with ICEC, and Data Migration was performed based on the shared filled data and updated data, Reconciliation sessions conducted with ICIEC project team, and the data reconciliation results were shared, eventually having all data reconciled as per the agreed scope, but ICIEC have asked for changes which are beyond the agreed scope on the Credit Insurance system.

  Mohammad Jarwan, ESKADENIA's key resource for data migration, was assigned to the project from 2020 through 2025, providing continuous support throughout the data migration activities.

- Change requests requested by ICIEC during the project implementation:

  Change requests were requested by ICIEC after conducting the original scope verification sessions, training sessions, during the UAT performed activities and during the final re-verification sessions.

  The re-verification sessions on all of the CRs were performed as per ICIEC request during 2024 & the begging of 2025 with 100 % verification completed and passed in accordance with the signed scope of the CR documents.

  - ✓ CR 01_2020 | The CR verification acceptance was signed by ICIEC on 26 Jun 2024.
  - ✓ CR 01_2021
  - ✓ CR 01_2022
  - ✓ CR 01_2024

3. Project Monitoring, Controlling and Reporting

- Throughout the project implementation, progress reports were prepared and shared with ICIEC starting on 15 Apr 2019, covering the project summary, status, progress, activities required from ICIEC's side, identified risks and issues, project resources, and efforts consumed.
- At the early stages of the project and throughout its implementation, the project risks were identified, communicated, and documented. One of the key risks identified as having a high impact on the project was the changes to the approved scope that could affect the planned go-live date. The agreed preventive approach was to handle changes that are outside the signed scope through separate Change Requests following ESKADENIA's change control procedure, with such changes to be implemented after go-live where applicable, and not to affect project acceptance.
- ICIEC has requested ESKADNIA to analyze several requests ex. New operational manual, integration with RCL (where several meetings were conducted with RCL team and ICEC) but they didn't go with it.
- Regular meetings were conducted with ICIEC to review and report the project status, progress, risks and issues, and the minutes of meetings and PowerPoints were prepared and circulated to document the discussions, decisions, and actions arising from those meetings.

- The latest technical meeting was conducted on 14 Apr 2025 between ESKADENIA and ICIEC to present our position of the new requirements requested and the following were shared by email with ICIEC based on the discussions made along with the PPT prepared presentation:

  - ✓ ESKADENIA highly recommends continuing with the UAT based on the agreed and signed scope documents (Scope Boundaries)
  - ✓ The project CCB (Change Control Board) are the SMEs (Subject Matter Experts) from ESKADENIA's Business Units involved in the project and consist of (The Business Unit Manager, The Product Manager(s)/ Or Product Owner(s), The Project Manager, and the Development Manager(s)).
  - ✓ The remarks (new requirements) raised can be delivered under a change request process after going live or after the UAT.
  - ✓ None of the justifications provided by ICIEC on the remarks has proved to be within the scope, *below are samples of the justification provided by ICIEC:*
    - *Illustrations are not scope boundaries—they demonstrate minimum UI expectations*
    - *ESKADENIA must implement a natural enhancement*
    - *ICIEC's business needs have evolved*
    - *Adjusting the behavior is a valid scope inclusion*
    - *The request enhances an existing functionality*
    - *This enhances an existing functionality…..etc.*
  - ✓ ICIEC Data must be corrected under ICIEC's current system (as mentioned in the Appendix A – 3 Data lifecycle Management)
  - ✓ ICIEC has acknowledged the below example shared by Radwan during the meeting;
    - Ex. The expiry dates provided by ICIEC don't match the initial dates & the durations provided.
    - Same is applied to the calculated items; premiums, etc.
  - ✓ ESKADENIA is still at their position with the remarks (additional requirements) under both the CRs verification & data reconciliation, Internal assessment meetings conducted based on the signed scope documents of the (BRD, Business Processes, and the CRs documents (01_2020, 01_2021, 01_2022 & 01_2024))

- The latest Project Progress Report was shared on 13 Apr 2025 where we've highlighted the overall status of the project as follows:

  - ✓ We've concluded the CRs verification activities from ESKADENIA's perspective (with reference to the agreed and signed CRs documents) with 100% progress
  - ✓ We've concluded the Data reconciliation activities from ESKADENIA's perspective with 100% progress
  - ✓ The remarks (which need development) raised during the (CRs verification & Data reconciliation) activities by ICIEC IT team were analyzed and justifications provided from both sides:

    - ESKADENIA's perspective (The remarks are out of scope); with the approved and signed scope documents serving as the baseline for our assessment.

    - ICIEC's perspective (The remarks are in the scope)

4. Key Challenges Faced

- **Continuous Changes and Additions to the Agreed Scope:**

  - Original Scope Definition and Sign-off During the period from Apr 2019 – Mar 2020
  - CR 01_2020
  - CR 01_2021
  - CR 01_2022
  - CR 01_2024

  Under each CR, additional changes were requested with some on the previously requested and agreed changes and our assessments had proved it, especially under the latest signed CR 01_2024, it's highlighted that the new requirements were a change to the previously requested requirements under the previous CRs and a clear note was stated under this CR 01_2024 document that highlighted this.

  Even when we've completed the re-verification sessions on all the CRs, ICIEC still requested for the new changes that are out of the signed scope to be delivered at no extra cost

- **Continuous Delays to UAT and Go-Live Activities Due to ICIEC's Ongoing Changes and Additional Requirements, which were Repeatedly Considered by ICIEC as Prerequisites for Proceeding with these Activities.**

- **Access to ICIEC Environments was Locked by ICIEC on 11 May 2025** from ESKADENIA resources as reported by the team, ICIEC team were reported with the issue.

- The Language you will use in the Oral Testimony is Arabic & English where applicable

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: 05 Nov 2026

- Your Signature: 