

# ASHTROM GROUP LTD

## Immediate Report on Holdings of Interested Parties and Senior Officers

*Regulation 33 (c)-(d) of Securities Regulations (Periodic and Immediate Reports), 1970*

Reference Numbers for previous reports on this subject: \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_.

**Here are the holdings as of 31/12/2025:**

### **A. Interested Parties in the Corporation**

(Including CEO and directors, as well as any other employee holding five percent or more of the issued share capital or voting power of the corporation)

Holder Number	Holder Name	Name, Type, and Series of Security	Updated Quantity of Securities	Holding Percentage	Full Dilution Holding Percentage
1	UNEDCO UNITED ENGINEERING AND DEVELOPMENT COMPANY LTD	Ordinary Share	59,868,866	Equity: 53.68% Vote: 53.68%	Equity: 52.87% Vote: 52.87%
2	Avraham Nussbaum	Ordinary Share	582,417	Equity: 0.52% Vote: 0.52%	Equity: 0.51% Vote: 0.51%
3	Michal Zahavi	Ordinary Share	582,416	Equity: 0.52% Vote: 0.52%	Equity: 0.51% Vote: 0.51%
4	Oren Nussbaum	Options 05/22 Non-tradable	157,599	Equity: 0% Vote: 0%	Equity: 0.20% Vote: 0.20%
5	Oren Nussbaum	Other Options Non-tradable	73,446	Equity: 0% Vote: 0%	Equity: 0% Vote: 0%
6	Gil Gueron	Ordinary Share	755,517	Equity: 0.68% Vote: 0.68%	Equity: 0.83% Vote: 0.83%
7	Gil Gueron	Options 05/22 Non-tradable	188,010	Equity: 0% Vote: 0%	Equity: 0% Vote: 0%
8	Dafna Levi	Ordinary Share	277,529	Equity: 0.25% Vote: 0.25%	Equity: 0.25% Vote: 0.25%
9	Haim And Rina Gueron Properties LTD	Ordinary Share	90,000	Equity: 0.08% Vote: 0.08%	Equity: 0.08% Vote: 0.08%
10	Yehudit Meshorer	Ordinary Share	480,802	Equity: 0.43% Vote: 0.43%	Equity: 0.42% Vote: 0.42%
11	Meshorer Properties Holding LTD	Ordinary Share	110,250	Equity: 0.10% Vote: 0.10%	Equity: 0.10% Vote: 0.10%
12	Yoram Rubin	Ordinary Share	36,397	Equity: 0.03% Vote: 0.03%	Equity: 0.03% Vote: 0.03%
13	Jonathan Rubin	Ordinary Share	144,849	Equity: 0.13% Vote: 0.13%	Equity: 0.13% Vote: 0.13%
14	Naama Limon Rubin	Ordinary Share	101,643	Equity: 0.09% Vote: 0.09%	Equity: 0.09% Vote: 0.09%
15	Nurit Mor	Ordinary Share	111,486	Equity: 0.10% Vote: 0.10%	Equity: 0.10% Vote: 0.10%
16	Alexander Lifshitz	Ordinary Share	17,085	Equity: 0.02% Vote: 0.02%	Equity: 0.02% Vote: 0.02%
17	Varda Lifshitz	Ordinary Share	111,486	Equity: 0.10% Vote: 0.10%	Equity: 0.10% Vote: 0.10%
18	Menora Mivtachim Holdings Ltd-Nostro	Ordinary Share	19,700	Equity: 0.02% Vote: 0.02%	Equity: 0.02% Vote: 0.02%
19	MENORA MIVTACHIM HOLDINGS LTD	Ordinary Share	7,282,482	Equity: 6.53% Vote: 6.53%	Equity: 6.43% Vote: 6.43%
20	CLAL INSURANCE ENTERPRISES HOLDINGS LTD	Ordinary Share	6,141,147	Equity: 5.51% Vote: 5.51%	Equity: 5.42% Vote: 5.42%
21	Phoenix Financial Ltd	Ordinary Share	8,315,186	Equity: 7.46% Vote: 7.46%	Equity: 7.34% Vote: 7.34%
22	Phoenix Financial Ltd-Nostro	Ordinary Share	50,013	Equity: 0.04% Vote: 0.04%	Equity: 0.04% Vote: 0.04%

<b>Holder Number</b>	<b>Holder Name</b>	<b>Name, Type, and Series of Security</b>	<b>Updated Quantity of Securities</b>	<b>Holding Percentage</b>	<b>Full Dilution Holding Percentage</b>
23	Phoenix Financial Ltd-Participant	Ordinary Share	91,910	Equity: 0.08% Vote: 0.08%	Equity: 0.08% Vote: 0.08%
24	The Phoenix Investments House Ltd	Ordinary Share	2,617,238	Equity: 2.35% Vote: 2.35%	Equity: 2.31% Vote: 2.31%
25	The Phoenix Investments House Ltd. (Market Maker)	Ordinary Share	137	Equity: 0% Vote: 0%	Equity: 0% Vote: 0%
26	Harel Insurance Investments & Financial Services Ltd- Nostro	Ordinary Share	93,947	Equity: 0.08% Vote: 0.08%	Equity: 0.08% Vote: 0.08%
27	Harel Insurance Investments & Financial Services Ltd	Ordinary Share	4,155,821	Equity: 3.73% Vote: 3.73%	Equity: 3.67% Vote: 3.67%
28	Harel Insurance Investments & Financial Services Ltd	Ordinary Share	1,666,801	Equity: 1.49% Vote: 1.49%	Equity: 1.47% Vote: 1.47%

**Total Holding Percentage:**

- Equity: 84.02% Voting: 84.02%
- Fully Diluted Equity: 83.1% Fully Diluted Voting: 83.1%

**B. Senior Officers in the Corporation (excluding CEO and directors, and excluding employees holding five percent or more of the issued share capital or voting power in the corporation)**

- Do not hold securities of the corporation.
- Below is the register of holdings of senior officers in the corporation:

Holder Number	Holder Name	Name, Type, and Series of Security	Updated Quantity of Securities	Holding Percentage	Full Dilution Holding Percentage
29	Gal Omer	Employee Options Non-tradable	167,564	Equity: 0% Vote: 0%	Equity: 0.15% Vote: 0.15%

**Total Holding Percentage:**

- Equity: 0% Voting: 0%
- Fully Diluted Equity: 0.15% Fully Diluted Voting: 0.15%

**Explanations:**

1. It is also necessary to report the holding of other securities (that are not bonds), including other securities not listed for trading.
2. In the event that a report is required on holding non-convertible bonds, the holdings may be attached as a PDF file in the designated field at the end of section B, instead of entering the data in the form, all according to Legal Staff Position No. 104-21: [Link](#)
3. If the interested party holds more than one type of security, the holding percentage (including full dilution) should be specified in one row, considering all securities held.
4. This form should detail the holdings of all interested parties, including those whose holdings have not changed.
5. In a case where the interested party is a company with material activity for the corporation, holdings should be split between shares purchased before the Companies Law 1999 and those after (dormant shares).
6. If the interested party is a corporation, provide the name(s) of the ultimate controlling shareholders. If there is no controlling shareholder—the details of the interested parties in it should be included.
7. If a senior officer holds five percent or more, their holdings should be reported under 'Interested Parties' table.
8. If an interested party or senior officer also holds securities in its material subsidiary, details should be provided in the 'Remarks' field.

### **Section 1 - Details for Main Holders and Controlling Shareholder Descriptions**

(Full details omitted for brevity. Contact for the Excel version for all fields/notes).

**Attachment: Holdings in Non-Convertible Bonds (as per Legal Staff Position 104-21):** [מצבת החזקות isa.pdf](#)

### **C. As of the date of this report and according to the law, is there a controlling shareholder in the corporation?**

- YES

**The controlling shareholder in the corporation is:**

- UNEDCO UNITED ENGINEERING AND DEVELOPMENT COMPANY LTD
- Registration number: 510439045 (Israeli Registrar of Companies)
- Control was not transferred during the period described

**Combined holding rate of all controlling shareholders in the corporation's share capital: 55.73%**

## Authorized Signatories for the Corporation

No.	Name	Role
1	Oren Nussbaum	Other: Deputy CEO for Finance and Business Development

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### Securities of the corporation are listed on the Tel Aviv Stock Exchange

**Abbreviated Name:** ASHTROM GROUP

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**Electronic Reporter Name:** Ehud (Udi) Efron

Position: External Legal Advisor

Employer: M. Firon & Co., Advocates

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**Update Date of Form Structure:** 21/10/2025

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**Glossary Applied:**

- אג"ח ממשלתי: Government bonds
- סדרה בלתי מסולקת: Outstanding balance
- בעל שליטה: Controlling shareholder
- בעלי שליטה: Controlling shareholders
- בקשר: Regarding
- ני"מ: Commercial papers
- ע.ג: Par value
- ני"ע: Security/Securities
- אופ: Warrant
- אופציות: Warrants
- תוצאות: Results
- שותפות: Partnership
- טכנולוגיות: Technology/Technologies
- דיבידנד: Dividend
- אג'ט (cent): Agorot
- יח"ש: Participating unit
- אג"ח, אג'ט, אגרות החוב: Bonds
- נ. מושרה: Officer/officers
- בלתי מסולקת: Outstanding
- סדרה מקורית: Original series
- רוזנשטיין: Accountant/accountants
- מערכות רצף מוסדי: TASE UP

#### **Company Names Usage:**

- ASHTROM GROUP LTD
- CLAL INSURANCE ENTERPRISES HOLDINGS LTD
- MENORA MIVTACHIM HOLDINGS LTD
- PHOENIX FINANCIAL LTD ...and others (see details in register).

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