

# Vincit Plc's disclosure policy

Version	Date of approval and approver
Established	March 25, 2020, Board of Directors of Vincit Plc
Updated	April 23, 2025, Board of Directors of Vincit Plc

## 1. Introduction

The purpose of this disclosure policy is to define the internal and external communication and investor relations practices and responsibilities that Vincit Plc (hereinafter “Vincit” or “the Company”) follows in its external communication. In its communications, Vincit complies with the Nasdaq First North Growth Market Rulebook, the rules of Nasdaq Helsinki Oy, the EU Market Abuse Regulation (MAR), the guidelines and regulations of the Finnish Financial Supervisory Authority (FIN-FSA), and the obligations of listed companies under the Finnish Limited Liability Companies Act, the Securities Markets Act and other legislation, as applicable, as well as the Company's disclosure policy approved by the Board of Directors. As Vincit's share is traded on the Nasdaq First North Growth Market Finland marketplace, the Company is not obligated to comply with the Finnish Corporate Governance Code 2025 prepared by the Securities Market Association.

The disclosure policy has been approved by the Board of Directors of Vincit Plc on April 23, 2025. The disclosure policy is reviewed and updated as necessary.

The summary of the disclosure policy is available on the Company's website at <https://investors.vincit.com/en>

## 2. Objectives and key disclosure principles

The purpose of Vincit's disclosure policy is to ensure that all parties operating in the market have immediate and simultaneous access to consistent, relevant, and sufficient information about factors affecting the value of the Company's share or other financial instruments.

In its communications, Vincit adheres to the following principles:

- The information disclosed is accurate, reliable and relevant
- The information is published as soon as possible
- Communication is consistent and accurate
- Communication is simultaneous, impartial and transparent

### 3. Decision-making, preparation and responsibilities regarding information disclosure

Vincit's CEO is responsible for monitoring and interpreting the company's disclosure policy.

The Company's CEO and CFO have the operative responsibility for the execution of the disclosure policy. Vincit's Board of Directors has the ultimate decision-making power regarding external communications, and it approves and confirms the disclosure policy.

The Company's Board of Directors approves the company announcements to be published. The CEO, or in their absence, the CFO, and the company's certified advisor review and approve all company announcements prior to their publication. In the event of a data leak, the CEO may also approve the company announcement (see section "Rumors and data leaks").

The Company's CFO, together with the persons/directors in charge of business operations, prepares the company announcements and their related supplementary materials before presenting the drafts to the CEO and/or the Board of Directors for decision-making.

### 4. Communication channels and language

Vincit's primary channel for investor information is the Company's website at <https://investors.vincit.com/en/>, which is equally available to all investors. The purpose of the website is to convey accurate and up-to-date information about the Company as an investment, and it is divided into several sub-sections. In particular, the site contains information intended for shareholders and analysts about the Company's shares and other financial instruments, financial performance, ownership and governance, as well as other materials mainly intended for investors. All releases published by the Company will be available on the website for at least five years from their publication.

In order to ensure fair and simultaneous distribution of information, the Company will make the material it uses in investor and analyst meetings, among other things, available on its website as soon as possible.

The Group's business areas' own websites focus on marketing-oriented communication that supports each business.

Business units primarily use social media as a marketing communications tool. Thus, social media is never the primary communication channel for the disclosure of information subject to disclosure requirements or other new information, but its role is to further distribute information published in official channels.

The official reporting language of the company is Finnish. Company announcements are published in Finnish and English.

## 5. Types of releases

Vincit's releases are divided into company announcements and press releases. The category of release is selected based on the materiality and significance of the information.

### 5.1 Company announcements

The Company will publish a company announcement as soon as possible concerning matters, actions and events related to the Company's operations that are estimated to have a significant impact on the price of the Company's financial instruments, as well as other matters to be announced under current regulations and the Nasdaq First North Growth Market Rulebook. The more detailed content of company disclosure is described in Section 6, "Disclosure of information".

### 5.2 Disclosure of transactions by persons discharging managerial responsibilities and their related parties

Persons discharging managerial responsibilities at Vincit and their related parties are required to notify both the Financial Supervisory Authority and Vincit of all transactions conducted on their own account relating to the Company's financial instruments.

The Company shall disclose information on transactions by persons discharging managerial responsibilities and their related parties promptly and no later than two (2) business days after the Company has received notification of the transaction from a person discharging managerial responsibilities or a related party. The information is published as a company announcement under the category "Managers' Transactions".

### 5.3 Changes in ownership and flagging notifications

The company discloses shareholders' notifications of reaching, exceeding or falling below the ownership thresholds stipulated in the Finnish Securities Markets Act. Changes in shareholdings must be notified and published if the ownership reaches, exceeds or falls below 5, 10, 15, 20, 25, 30, 50 or 90 per cent or two-thirds of the total number of votes in the Company or the total number of the Company's shares. A flagging notification is also required when a shareholder is a party to an agreement or other arrangement which, when implemented, would result in reaching or exceeding a

flagging threshold, or in a shareholding falling below a flagging threshold. Notifications of changes in shareholdings are published without undue delay in a stock exchange release.

## 5.4 Press releases

The Company publishes press releases regarding such business related events that do not meet the requirements for company releases but are considered to have news value or are otherwise considered to be of interest to the Company's various stakeholders.

## 6. Disclosure of information

The Company will publish a company announcement as soon as possible concerning matters, actions and events related to the Company's operations that are estimated to have a significant impact on the price of the Company's financial instruments, as well as other matters to be announced under current regulations and the Nasdaq First North Growth Market Rulebook. The Company itself assesses whether the information could have a significant impact on the price of the Company's financial instruments. The information is disclosed once it has been confirmed and verified, and the Board of Directors or the Company's management has made a decision regarding its disclosure.

### 6.1 Inside information

In accordance with the EU's Market Abuse Regulation (MAR), Vincit discloses any direct insider information concerning the Company as soon as possible. Inside information is published in a company announcement. The basic information of the company announcement shall include the annotation "Inside information" when the announcement concerns inside information.

Inside information means precise information, which has not been made public, relating directly or indirectly to the Company and which, if it were made public, would be likely to have a significant effect on the prices of the Company's financial instruments or the price of related financial derivatives.

In determining whether information is inside information, the Company considers the likely impact of the information in relation to the Company's business as a whole and all other market factors that may affect the price of the Company's financial instrument in the situation.

In accordance with the EU's Market Abuse Regulation (MAR), Vincit may decide to postpone the disclosure of inside information, if all the following conditions are met:

- immediate disclosure would likely jeopardize the legitimate interests of Vincit;
- delaying disclosure is unlikely to mislead the public; and
- the confidentiality of that information can be ensured.

The decision to delay, its timing and the reasons for the decision to delay are recorded by the Board of Directors or the CEO, who also monitors the fulfillment of the above-mentioned criteria. A pre-drafted announcement is prepared for a possible data leak. The company notifies the Financial Supervisory Authority of the postponement of disclosure immediately after the information is disclosed.

The procedure guidelines and decision-making document regarding the postponement of the disclosure of inside information are attached to this disclosure policy as Appendix 1.

Inside information may include, but is not limited to:

- Changes in the Company's strategy
- Changes in the future outlook
- Significant investments and financial arrangements, e.g., a company or business acquisition
- Significant customer or cooperation agreements
- Significant legal proceedings or other official proceedings and decisions taken therein

## 6.2 Financial reports

Vincit publishes its half-year report and financial statement release, as well as two business reviews, according to a pre-announced annual schedule. Vincit publishes its annual calendar as a company announcement before the end of each financial year.

Vincit prepares its regularly published financial reports in accordance with FAS (Finnish Accounting Standards). The financial reports are prepared by the Company's management.

Risks and significant uncertainties are only updated for the full year. Financial guidance is always updated if there are changes to it.

Information to be disclosed includes:

- Financial Statement Release and Half-Year Financial Report. Financial information for the full year and half-year will be published at least to the extent required by the rules for First North companies in force at any given time. The information is published on the Company's website on the date indicated in the investor calendar for the full year no later than three months after the end of the financial year and for the half year no later than two months after the end of the reporting period.
- A Business Review is published twice a year, after the first and third quarters. The information will be published on the date indicated in the Company's investor calendar, no later than one month after the end of the reporting period.
- The financial statements, the report by the Board of Directors, and the auditor's report will be published during the week announced in the investor calendar, no later than three months after the end of the financial year, and at least three weeks before the Annual General

Meeting.

## 6.3 Silent period

Regularly published financial reports are always preceded by a 30-day silent period during which Vincit does not comment on the Company's financial position, business, markets or prospects. During the silent period, representatives of the Company's top management do not meet with investors, analysts or other market participants and do not give interviews regarding the company's financial position. The dates of result releases are published in Vincit's investor calendar on the company's website.

If an event during the silent period requires immediate disclosure, the Company will disclose the information promptly in accordance with the disclosure requirements and may comment on the event and/or meet with market participants.

## 6.4 Financial targets and guidance

In connection with the strategy process, Vincit's Board of Directors defines the Company's financial targets and assesses the need for changes. Changes to financial targets are announced via company announcements.

The company presents its outlook by providing an annual estimate of the likely future development in connection with the financial statements in the report by the Board of Directors, which is also published as part of the Financial Statement Release. The company may not provide exact numerical forecasts in its guidance, but it strives to provide the general direction of future development to the best of its ability.

Vincit does not comment on the Company's valuation or the development of the share price or the price of other financial instruments. If market expectations differ significantly from the estimates given by the Company, the Company will pay special attention to the accuracy of its communication and the explanation of its earnings logic.

## 6.5 Profit warnings

Vincit will release a profit warning as soon as possible if the Company estimates that its financial position and/or future outlook deviates significantly, either positively or negatively, from the information it has previously published or from an assessment that can reasonably be made based on the signals previously given by the Company. The profit warning decision is based on the information previously provided by Vincit, and the prevailing market situation is also taken into account when making it. The Company's Board of Directors makes the decision to issue a profit warning. Issuing of a profit warning cannot be postponed.

Information to be disclosed includes:

- Material changes in outlook (positive and negative profit warnings)

## 6.6 Other situations required by the rules

Other information to be disclosed includes:

- Significant organizational changes
- Changes in the composition of the Board of Directors or the Leadership Team, changes regarding the certified advisor, the auditor and measures to increase liquidity
- Notice of the Annual General Meeting
- Resolutions of the Annual General Meeting
- Share-based incentive schemes
- Issuance of financial instruments
- Related party transactions
- Other important matters affecting the Company's business and other matters in accordance with the rules of the First North Growth Market Rulebook in effect at the time

## 7. Media relations and representing the Company

### 7.1 Meeting the media and interview requests

Vincit aims to respond to media inquiries as quickly as possible and to actively meet with media representatives. The Company's CEO coordinates media meetings. Meetings are attended by the Company's top management or other business management or other Company representatives, depending on the topic. The purpose of the meetings is to provide background information on the Company, its operations and operating environment.

Discussions with the media are always based on market information previously published by Vincit or otherwise generally available. Individual statements must not provide information that deviates from the information previously published by the Company, nor such supplementary information that together with the previously published information may constitute new material information.

### 7.2 Vincit's representatives in the media

Only designated individuals are authorized to make public statements pertaining to the Company. Only the CEO, CFO and Chairperson of the Board comment on the Group's strategy, results, financial targets and their development.

In addition, the Company has appointed representatives (spokespersons) who are authorized to issue statements on behalf of the Company. These representatives are

- The CEO and the Chairperson of the Board in all matters concerning the Company
- The CEO and CFO specifically in matters relating to the Company's financial performance
- Business management in matters concerning their own area of responsibility
- Other employees may, when necessary, issue opinions regarding their area of expertise
- The CEO is responsible for media relations

The CEO or other management of the Company will not comment on matters relating to the Company's Board of Directors or matters within its jurisdiction. The Board is represented by the Chairperson of the Board.

### 7.3 Rumors and data leaks

The Company generally does not comment on rumors circulating in the market, the performance of its stock, the actions of competitors or business partners, or analysts' estimates, except to correct material and clearly erroneous information that could have a material effect on the value of the Company's stock or other financial instruments.

The Company continually monitors internally for events and situations that could result in a data leak. Special attention is paid to the confidentiality of information in situations where a decision has been made to delay the disclosure of inside information. If confidential information concerning Vincit is leaked and has a significant effect on the value of the Company's shares or other financial instruments, the Company will publish an announcement on the matter as soon as possible. In such a case, the CEO will make the final decision on the disclosure of the information.

### 7.4 Contact with investors and analysts

Vincit aims to respond promptly to inquiries from investors and analysts and meets with them regularly to discuss the Company, its operating model, strategy and financial performance. The CFO prepares presentation materials for meetings, monitors the market and shareholders, and collects investor feedback for the Company's Board of Directors and management. Investor meeting discussions are based on information already published or generally available on the market and do not present new information that could potentially affect the value of the Company's share or other financial instruments.

## 8. Crisis situations

The company strives to identify potential crisis situations and risks that may affect its operations. In the event of a crisis, the Company's CEO must be informed immediately. Depending on the scope and



nature of the crisis, the CEO will appoint a crisis management team to handle the situation and coordinate communications. In a crisis, communication must be clear, consistent and truthful. The company's crisis communication also includes ex-post evaluation and updating the necessary measures.