

## Dovre Group Plc Disclosure Policy

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This disclosure policy describes the main principles according to which Dovre Group Plc (“Company”), as a listed company, discloses information to capital markets and other stakeholders. This disclosure policy comes into force as of October 14, 2022.

In its disclosure policy, Dovre Group complies with EU legislation, the Finnish Securities Markets Act, the Finnish Companies Act, the regulations of the Finnish Financial Supervisory Authority, the rules of NASDAQ Helsinki Ltd as well as other regulations governing listed companies.

The purpose of the policy is to ensure that the market has access to sufficient and accurate information concerning the Company’s financial position and operations, and that all legally mandated disclosures are released without undue delay and in a non-discriminatory and non-selective manner. Dovre Group discloses both positive and negative information consistently and simultaneously to the market.

This policy governs all functions and entities of Dovre Group. The Company’s Communications Team is responsible for the implementation of the policy. The Company responds to all inquiries by shareholders, investors, investment analysts, and the media without undue delay. The Company’s releases indicate the Company’s spokesperson(s) concerning the information disclosed. This policy has been distributed to all Dovre Group’s entities globally to ensure that Dovre Group employees understand the disclosure obligations, restrictions, and regulations governing listed companies.

### Key disclosure principles

Dovre Group communicates with the capital market and other stakeholders primarily through stock exchange releases and press releases.

In order for the information provided to the market to give market participants a fair picture of Dovre Group, it is important that Dovre Group’s information is both consistent and compliant with applicable regulations. Disclosures must therefore (if permitted by the applicable regulatory framework) take into account Dovre Group’s previous disclosure practice in similar cases (including any threshold values applicable to the notification and the choice of the notification channel).

### *Stock exchange releases*

Dovre Group discloses all information, which is likely to have a significant effect on the price of the Company’s financial instruments as a stock exchange release. The preparation and publication of stock exchange releases is the responsibility of the Company’s Communications Team, which consists of the information officers, the Company’s CEO, one member of the Company’s Board of Directors and one member of the Company’s Group Executive Team. The task of the Communications Team is to regularly, but at once every six months, assess the need to update the disclosure policy and to otherwise evaluate the state of the Company’s communication. The Company’s Board of Directors

approves all stock exchange releases that contain financial information as well as those that require the Board's decision. The Company's CEO approves other stock exchange releases.

Dovre Group discloses its Half-Year Financial report and its Year-End Financial Report on regular basis and according to a preannounced schedule. In addition, the Company releases Trading Statements covering the first three and the first nine months of the financial year as stock exchange releases. The Annual Report is published once a year. The release schedule for the upcoming financial period is announced prior to the end the previous financial period. Where necessary, the Company discloses as stock exchange releases all other information that is likely to have a significant effect on the on the price of the Company's financial instruments.

Dovre Group releases information concerning changes in its corporate strategy and the composition of the Board of Directors as stock exchange releases. The Company also releases all significant changes in its financial outlook and result and its business structure and organization as well as all information concerning corporate acquisitions, restructuring measures, and major contracts as stock exchange releases. Changes to the Group Executive Team and auditors are communicated through stock exchange releases. The Company also releases as stock exchange releases all transaction notifications submitted both by persons discharging managerial responsibilities in the Company and by persons closely associated to them once a total amount of EUR 5,000 has been reached within a calendar year.

Stock exchange releases can only be published if the information in question meets the materiality criteria presented below.

#### *Press releases*

The Company releases as press releases information relating to the Company's business, which does not have a significant effect on the price of the Company's financial instruments, but has marketing value. The respective business area or unit produce press releases. Group level press releases are prepared by the Group administration. The Group administration publishes and distributes all press releases through the Company's main communication channels (the Company website and NASDAQ Helsinki Ltd.'s press release distribution service). Business areas or units may also use other channels to distribute their press releases. The Company's CEO approves all press releases.

#### **Rumours, market assessments, and information leaks**

The Company does not, as a rule, comment on public rumours, Company valuations, share price developments, or analyst forecasts. If materially erroneous information about the Company is publicly disseminated and this information is likely to have a significant effect on the price of the Company's financial instruments, the Company may consider correcting this information by releasing a stock exchange release. If information which is likely to have a significant effect on the price of the Company's financial instruments has, whether prematurely or accidentally, been released selectively and discriminately, the Company will immediately disclose this information to the market and other stakeholders as stock exchange release.

#### **Contacts with investors, analysts, and media**

Dovre Group aims to respond to inquiries from investors, analysts, and media without undue delay. The Company's Communications Team centrally handles communication with investors and analysts. The Communications team also prepares and coordinates all financial reports and other material that concerns shareholders, investors, and analysts. Dovre Group's CEO and CFO or the person(s) designated by them may comment on the Company's financial situation, its outlook, and the markets as a whole. Heads of the Company's business areas or units may comment on issues within the scope of their area of responsibility. The Company's releases indicate the Company's spokesperson(s) concerning the information disclosed.

**Silent period**

The Company observes a three (3) week silent period prior to the Company's scheduled earnings releases (Half-Year Financial Report, Annual Financial Statements, and Q1 and Q3 Trading Statements). During this period, the Company does not comment on its financial situation, business, or outlook, nor meet with investment analysts or other members of the investment community. If an event during the quiet period requires immediate disclosure, the Company will disclose the information immediately in compliance with disclosure rules and may comment on the event concerned.

**Inside information and insiders**

Dovre Group complies with the applicable legislation, the standards of the Finnish Financial Supervisory Authority as well as NASDAQ Helsinki Ltd.'s Guidelines for Insiders. In accordance with the legislation in force and the standards and guidelines in question, inside information refers to all information of a precise nature, which has not been made public and relates, directly or indirectly, to one or more issuers or to one or more financial instruments and which, if made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments. Dovre Group discloses any possible inside information concerning the Company as soon as possible and as a stock exchange release. However, the Company may, on its own responsibility and on a case-by-case basis, delay disclosure of inside information to the public in accordance with the conditions outlined in the Market Abuse Regulation ((EU) No 596/2014). If the Company decide to delay disclosure, the Company documents and continuously monitors the conditions for delayed disclosure. The Company notifies the Finnish Financial Supervisory Authority of the delayed disclosure immediately after the information has been publicly disclosed.

The Company's insider manager is the Group's CFO, who performs tasks related to insider management together with the manager of insider lists, the insider communication manager and the persons responsible for project-specific insider registers. In addition, the head of each function is responsible for supervising the insider affairs of his own organization. The Company organizes training in activities related to insider affairs. The manager of the relevant insider project, who is named to the aforementioned project-specific insider register, is responsible for preparing and maintaining project-specific insider register.

The list of insiders includes, by virtue of their position, Dovre Group's management personnel (the members of the Company's Board of Directors, the CEO, the members of the Group Executive Team and the Company's subsidiary Suvic Oy's Board members and CEO) and certain other persons working in the knowledge core of Dovre Group who, based on the tasks they perform, have better knowledge of the Company than the market in general. These persons are typically persons who prepare an interim report or annual financial statements, persons responsible for the Company's finances, financial reporting or communication, or persons who have access to such information, as well as some other persons working in managerial positions in the Company.

The Company also keeps a project- or event-specific insider list of all persons who have access to insider information and who work for the Company based on an employment contract or otherwise perform tasks through which they have access to insider information. Persons who participate in the planning and preparation of projects or events dealing with insider information, such as mergers and acquisitions, are considered to be Project- or event-specific insiders. A project-specific insider may not trade or carry out other transactions with the Company's financial instruments during the project.

**Trading restrictions**

Persons discharging managerial responsibilities in the Company may not trade in any financial instruments in the Company during a closed period of 30 calendar days before the announcement of the Company's Half-Year Financial Report, Annual Financial Statements, or Q1 and Q3 Trading Statements. In addition to persons discharging managerial responsibilities in the Company, the trading restriction applies to the Company's employees participating in the preparation, drawing-up, and disclosure of the Company's financial reports.

**Communication channels**

Dovre Group's primary channels of communication are the Company's website and the stock exchange and press release distribution service provided by NASDAQ Helsinki Ltd. All releases released by the Company are available on the Company's website and are stored there up to five (5) years from the date of release. The Company's Annual Financial Statements, Corporate Governance Statement, Remuneration Report, Auditor's Report, Half-year Financial report, Financial Statement Release, and the Q1 and Q3 Trading Statements regularly released by the Company are available on the website up to ten (10) years from the date of release. Euroclear Finland Ltd. provides shareholder details published on the Company's website.

The Company's official reporting language is Finnish. However, because the Company operates in both Finnish and English, all public reports are also released in English. Press releases prepared by business areas or units that have only local relevance may be published only in the local language.

**Crisis communication**

Crisis communication is part of the Company's risk management strategy. The aim of crisis communication is to ensure that the Company is able to implement and carry out quickly and efficiently all necessary communication measures in crises. The Company's Communications Team is responsible for crisis communication.