

# INCAP CORPORATION

# THE DISCLOSURE POLICY OF INCAP CORPORATION.

This disclosure policy document approved by Incap Corporation's Board of Directors describes the objectives and key principles that Incap as a listed company follows when communicating with the capital markets, media and other stakeholders. The CEO of Incap Group monitors the compliance with the disclosure policy and defines the procedures in cases where adherence to these instructions may be deviated from. This policy is publicly available on Incap's website. It is reviewed periodically and revised if necessary.

The share of Incap Corporation, the parent company of Incap Group, is listed on Nasdaq Helsinki Ltd. In its disclosure policy and investor communications, Incap complies with the applicable EU and Finnish legislation, the rules of Nasdaq Helsinki, the regulation and guidance of instructions of the European Securities Markets Authority ("ESMA") and the Finnish Financial Supervisory Authority, other rules regulating listed companies and Incap's own policies and guidelines.

## **The principles and responsibilities of investor relations.**

The objective of Incap's investor relations is to support the correct price formation of its share by producing accurate and timely information concerning the company's business, financial development, goals, and strategy. Incap's guidelines for communication are used to ensure that information concerning the company is published in a timely, consistent

and clear manner and simultaneously to all market participants.

Incap's investor relations are managed by the President and CEO, who is ultimately responsible for the fulfilment of the disclosure obligation. Disclosure policy applies also to the company's internal communication and the information provided to employees.

## **Stock exchange releases.**

Incap publishes inside information and certain other information based on the regulation as stock exchange releases.

The following information and events are always published as stock exchange releases:

- inside information

- financial reports, including business reviews, half-year reports and financial statements report
- Annual Report including financial statements and Board of Directors' report, Corporate Governance Statement, and Remuneration Report

- schedule for financial reporting
- changes in the company's Board of Directors and top management
- changes of the company's auditors
- significant changes in the Group structure
- share-based incentive plans
- notice to convene and the decisions of the Annual General Meeting
- management transactions
- changes to the total number of shares and the number of shares held by Incap
- flagging notifications
- material transactions with related parties

significant for the decision-making of an investor:

- significant investments
- strategically significant company acquisitions or divestments
- credit losses or losing important customers
- significant credit arrangements
- important new product range extensions
- significant new orders or strategically important cooperation agreements
- significant legal actions taken by or against Incap or its subsidiary
- crises with significant impact on Incap's operations or reputation
- significant organisational changes

The following events are published as stock exchange releases if the event or information is inside information or estimated to be

Incap may also publish other information as stock exchange releases based on regulations or the rules of Nasdaq Helsinki.

## Press releases.

A press release is used to publish information on business-related events that do not meet the criteria for a stock exchange release, but which are deemed to be of news value or otherwise of general interest. Incap respects the views of its customers and other business partners on publishing information concerning

orders received, company acquisitions, and cooperation agreements. Publishing customer contracts with the customer's name always requires the approval of the customer and the company's own judgement on the competitive situation.

## Inside information.

Incap publishes and manages inside information in accordance with the requirements of MAR, the Insider Guidelines of Nasdaq Helsinki Ltd., and Incap's Insider Policy. The policy describes, among others, the definition of inside information, the management of inside information and the procedures for delaying the disclosure of inside information.

Trading by Incap's insiders is forbidden 30 days before the release of an interim report, a half-year report, a financial statements bulletin or any other financial report.

Changes in the holdings of insiders are disclosed in stock exchange releases, which the company publishes in accordance with the MAR regulation.

## Regularly published financial and other reports.

Incap publishes business reviews for three and nine month's periods of the year as well as the half-year report for the first six months of the year and financial statements release for twelve months. The half-year report and financial statement release are drafted according to IFRS regulations and include figures describing the development of revenue and profitability for the last 6-month period. Business reviews describe operations during the period from the beginning of each 3-month or 9-month period giving significant information on the development of the company's business, the realisation of the strategy, investments, company acquisitions,

financing, balance sheet, future prospects, and other relevant topics. The financial statement is published within three months after the end of the financial period.

In addition, Incap annually publishes a Corporate Governance Statement and a Remuneration Report in compliance with the Corporate Governance Code.

Incap publishes reports according to a predetermined schedule. The reports are published at the Group level. Incap does not have any operational or geographical segments that would be reported separately.

## Information leaks and market rumours.

If Incap finds out of a market rumour that is clearly related to inside information that has been leaked, the company discloses the information immediately.

Incap does not comment on market rumours. However, if necessary, the company rectifies at

its discretion essential and erroneous information presented on the market that may have a harmful impact on the company's business or price formation of the company's shares.

## Guidance.

Incap provides outlook statement covering a certain period in connection with business reviews, financial statement releases, half-year reports and interim reports as well as on the

company's website. The outlook includes the grounds and potential factors of uncertainty related to the outlook.

## Profit warning.

As per the EU Market Abuse Regulation (MAR), Incap issues a profit warning if the company's forecasted profit or financial position in the review period differs from that which it previously publicly forecast or can be reasonably expected from other information

previously published by the company and the change in question is so material that it meets the definition of inside information according to the Market Abuse Regulation (MAR). Profit warnings are published without delay.

## Flagging announcements.

Incap publishes announcements made by shareholders on significant changes in

holdings in accordance with the Securities Market Act. Changes in holdings are disclosed

when the holding reaches, exceeds or falls below 5, 10, 15, 20, 25, 30, 50 or 90 percent or two

thirds of the voting rights or the number of shares of the company.

## Methods of publication.

Among other things, Incap publishes information through stock exchange and press releases, the company's website, brochures, interviews, and public presentations. Incap uses a distribution service for publishing the stock exchange releases to allow the different market participants to receive the published information simultaneously. Through the distribution, the stock exchange releases are also delivered to the stock exchange and the central storage facility responsible for archiving the stock exchange releases. At the same time, the releases are published on the company's website.

Incap's website also presents up-to-date information about Incap and other information published based on the applicable regulation and disclosure obligation of a listed company. All financial reports are available on Incap's website for 10 years. All other regulated information is archived on the company's website for 5 years. Incap's stakeholders can subscribe to releases on the company's website.

The official reporting language of Incap is Finnish. All official material is published in Finnish and English.

## The calendar and the silent period.

Each year, Incap publishes a calendar showing the release dates for the company's financial reports and the time of the Annual General Meeting. The release dates for the next financial period are always published before the end of the previous financial period.

Incap observes a silent period of three weeks prior to the publication of financial statements and financial reports. During this period, the

company's representatives will not issue statements on the financial development or future prospects of the company or meet with representatives of the capital markets. If events requiring immediate disclosure during the silent period occur, Incap will disclose the information according to the regulation and comment on the event in question, if necessary.

## Investor relations.

Incap's representatives regularly meet with owners, investors, and analysts at investor fairs, seminars, events organised by various organisations, and one-on-one meetings. When publishing the financial results, Incap may arrange webcasts for analysts, financiers, investors, and the media when needed. In these meetings and events, the company representatives only present previously disclosed information or information that is common knowledge in the market. The aim is to provide the market with information increasing the understanding of the

company's business model, strategy and financial performance.

Incap answers to questions asked by shareholders, investors, analysts, and the media without delay, except during the silent period. If requested by an analyst, Incap evaluates the correctness and accuracy of publicly available information included in a research report drafted by the analyst. Incap does not distribute analysts' reports to investors or favour a particular analyst.

Incap monitors market expectations, but it does not comment on analyst's estimates or

forecasts. Such estimates and forecast do not form the basis for profit warnings. Incap does not under any circumstances comment on the

company's price formation or the development of the share price.

### **Spokesperson.**

The President and CEO and the CFO have the authority to issue statements concerning Incap Corporation or its subsidiaries.

Helsinki, 24 April 2025  
Incap Corporation  
Board of Directors