

## **DISCLOSURE POLICY**

### **GRK INFRA PLC**

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Approved by the Board of Directors of GRK Infra Plc  
with effect from 21 March 2025

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## 1 GENERAL INFORMATION

### 1.1 Introduction and the objectives of the disclosure policy

GRK Infra Plc ("**GRK**" or the "**Company**") is a Finnish public limited company whose shares are traded on the official list maintained by Nasdaq Helsinki Ltd ("**Nasdaq Helsinki**"). This disclosure policy has been approved by the Board of Directors of the Company, and it describes the key principles and practices that GRK adheres to in its communication with capital markets, the media and other stakeholders. The disclosure policy will be reviewed periodically and updated as necessary.

The Company complies with applicable EU and Finnish legislation, such as the Securities Markets Act (746/2012, as amended) and the Market Abuse Regulation ((EU) N:o 596/2014) ("**MAR**") in all disclosure and communications. Furthermore, the Company complies, as applicable, with the rules of Nasdaq Helsinki and the regulations and guidelines of the European Securities and Markets Authority ("**ESMA**") and the Finnish Financial Supervisory Authority, the Finnish Corporate Governance Code for listed companies maintained by the Finnish Securities Markets Association as well as Company's principles and other internal guidelines.

The aim of the disclosure policy is to ensure that all parties have access to equal, fair, adequate and simultaneous information on the Company and its business for the basis of price formation of GRK's financial instruments. The disclosure policy aims to ensure proper disclosure of information. The key principles of GRK's disclosure are consistency, accuracy, transparency, activeness and fairness. GRK communicates information, whether positive or negative, consistently and simultaneously to the capital markets and stakeholders.

The principles of the disclosure policy apply to the whole GRK group. This disclosure policy has been approved by GRK's Board of Directors on 10 March 2025 and will be updated as necessary. The disclosure policy will be effective from 21 March 2025, when it shall be published on the Company's website in Finnish and English.

## 2 PERIODIC DISCLOSURE OBLIGATION

GRK publishes its financial statement release, annual financial statements and the report of the Board of Directors, half-year report and interim reports as a stock exchange release in accordance with a pre-announced annual schedule. Before the beginning of each financial year, the Company publishes an event calendar, including the dates of publication of the Company's financial reports and the date of the Company's Annual General Meeting in a stock exchange release. The calendar is also published on the Company's website.

In accordance with the provisions of the Securities Market Act and the recommendations of the Corporate Governance Code, the Company publishes a Corporate Governance Statement and a remuneration report for governing bodies for each financial year. Furthermore, the auditor's report on the annual financial statements is published together with the publication of the annual financial statements and the report of the Board of Directors. Furthermore, GRK publishes a statutory sustainability statement as part of the

report of the Board of Directors. Other information and materials required by the Corporate Governance Code are published on the Company's website.

### **3 ONGOING DISCLOSURE OBLIGATION**

GRK will publish inside information as soon as possible as a stock exchange release, unless the conditions for delayed disclosure are met. The obligation to publicly disclose inside information and the procedure for delaying disclosure are discussed in more detail in the Company's insider guidelines. It will be stated in the title of the stock exchange release in which GRK discloses inside information that the disclosed information is inside information.

Inside information means information of a precise and undisclosed nature relating directly or indirectly to the Company or one or more Company's financial instruments and which, if made public, would be likely to have a significant effect on the prices of the Company's financial instruments or the prices of related derivatives.

### **4 MANAGERS' TRANSACTIONS**

GRK will publicly disclose transactions in the Company's financial instruments by the Company's managers and persons closely associated with them as a stock exchange release promptly and no later than two (2) working days after receiving the notification. A manager refers to a member of the Board of Directors, the President and CEO and the CFO of the Company. Disclosure obligation of managers' transactions is specified in more detail in the Company's insider guidelines.

### **5 OTHER INFORMATION TO BE DISCLOSED PURSUANT TO REGULATION AND THE RULES OF NASDAQ HELSINKI**

The Company shall also disclose through stock exchange release other regulated information and information to be disclosed pursuant to the Rules of Nasdaq Helsinki, including the following:

- Financial reports
- Notice of general meeting and decisions of general meeting
- Information on the issuance of financial instruments
- Changes in the Board of Directors or senior management or change of auditor
- Decision on the introduction of a share-based incentive scheme (if any)
- Significant transactions between the Company and its related parties
- Decisions on listing the Company's financial instruments
- Event calendar on the publication dates of the financial reports
- Information on a share buyback programme

- Information on the total number of shares and votes monthly, if this number has changed
- Notifications of major holdings
- Other information required to be disclosed under the applicable regulations or the rules of Nasdaq Helsinki.

Stock exchange releases are published in accordance with the current message categories of Nasdaq Helsinki.

## **6 RELEASES**

### **6.1 Stock exchange releases**

Information covered by the periodic and ongoing disclosure obligations described above is published as a stock exchange release. Inside information subject to ongoing disclosure obligation may include significant new orders, projects, contracts, mergers and acquisitions, litigation or other matters relating to the Company's activities.

Stock exchange releases are distributed simultaneously to the key domestic media and a few international news agencies via the STT's release distribution service and to the national central storage of regulated information. All releases are also published simultaneously on the Company's website. The Company's reporting languages are Finnish and English.

### **6.2 Investor news**

GRK's business-related events that do not meet the criteria for the public disclosure of inside information and other stock exchange releases, but which are deemed to be of interest to the Company's investors, are published as investor news.

For example, new orders, construction project launches and cooperation agreements are published as investor news. Investor news may also include invitations to various investor events and meetings and related news and recordings.

The languages of the investor news are Finnish and English.

### **6.3 Press releases**

GRK issues press releases on events that it considers to be of interest to the general and professional media and the Company's stakeholders, but which do not meet the criteria for disclosing inside information and other stock exchange releases.

For example, press releases are used to report on matters of local or professional media interest, such as the activities or progress of a specific construction site or the technical solutions or methods used in construction. The language of the press releases is Finnish. Press releases may also be published in Swedish, Estonian or English.

## **7 RUMOURS AND ANALYST FORECASTS**

### **7.1 Rumours**

GRK does not comment on public rumours. However, in the event that unfounded market rumours or blatantly inaccurate information may have a material impact on the price of the Company's financial instruments, the Company will consider correcting such market rumours or inaccurate information without delay.

If a market rumour clearly relates to inside information, the publication of which the Company has delayed, and the rumour is sufficiently specific to indicate that the confidentiality of such inside information can no longer be guaranteed, the Company will publicly disclose the inside information as a stock exchange release as soon as possible.

Information relating to market rumours concerning the Company shall be provided primarily by the President and CEO and secondarily by the CFO of the Company.

## **7.2 Analyst forecasts**

The Company does not correct analyst forecasts or give comments on the Company's valuation or share price development. The Company is not responsible for any valuations made by representatives of the capital markets or comment on these. The Company may review the accuracy of already published information in the analyst estimate or report upon request, but it does not give comments on the conclusions.

If the Company discovers that the conclusions presented by an analyst on the value of the Company's financial instruments significantly differ from the Company's own estimate, the Company shall consider whether the information it has provided has been correct and sufficient for making a justified estimate on the Company and its financial instruments.

## **8 FUTURE OUTLOOK**

The Company may present in its financial statements releases, half-yearly reports and interim reports a numerical estimate of the development of revenue and profit for a selected reporting period (guidance). Furthermore, the Company provides supplementary information on, among other things, the market prospects.

## **9 PROFIT WARNING**

The Company will issue a profit warning as soon as possible as inside information via a stock exchange release if it estimates that the Company's profit or financial position or their likely development has changed materially from the information previously disclosed by the Company. The profit warning is based on the Company's earlier forecasts or what can be reasonably inferred from information previously disclosed by the Company. The Board of Directors of the Company decides on issuing a profit warning. In an extraordinary situation, if the Board of Directors cannot reach quorum within a timeframe required by a profit warning, the President and CEO can decide on issuing a profit warning together with the Chairman of the Board of Directors. The issuing of a profit warning must not be delayed.

## **10 INVESTOR COMMUNICATIONS**

The objective of the Company's investor communications is to support the correct value creation of the Company's financial instruments by communicating effectively with the different parties on the capital markets. The Company's management meets with

investors and analysts at events and meetings aimed at presenting the Company, its business, strategy, operating environment, objectives and financial result. Discussions with investors, analysts and the media are limited to information that has already been published or made publicly available on the market.

The President and CEO and the CFO are responsible for issuing statements concerning the Company to the capital markets. The President CEO or other executives of the Company do not comment on matters concerning the Board of Directors of GRK. The Board of Directors is usually represented by the Chairman. Others may make statements in matters related to the Company only when specifically authorised by the President and CEO.

The communications manager of the Company is responsible for the practical organisation of investor communications, such as coordinating and organising communication related events and interviews.

## **11 CRISIS COMMUNICATIONS**

The President and CEO and the communications manager of the Company lead GRK's crisis communications. The objective of the communications is to share information in a coordinated, rapid, clear, equal and transparent way.

## **12 WEBSITE AND SOCIAL MEDIA**

GRK's website ([www.grk.fi](http://www.grk.fi)) is the Company's principal channel of communication for up-to-date investor communication. The Company publishes stock exchange releases and investor news on its website in Finnish and English. The language of press releases is Finnish, but they can also be published in Swedish, Estonian or English.

The Company keeps the stock exchange releases it has published on its website for at least five (5) years. The Company keeps the financial reports, corporate governance statement and remuneration report published under the periodic disclosure obligation on its website for at least ten (10) years.

## **13 SILENT PERIOD AND CLOSED WINDOW**

Regularly released financial reports are preceded by a silent period starting 30 days before the day of the disclosure of the next financial report. During the silent period, results or factors affecting it are not discussed by the representatives of the Company with the representatives of capital markets or media. The silent period ends when the financial statements, interim report or the half-yearly report is published.

Should an event requiring immediate disclosure (such as a significant business transaction) occur during the silent period, GRK shall publicly disclose said information without delay in accordance with applicable disclosure obligations and procedures and may comment on said event after the disclosure. Furthermore, GRK may, at its discretion, publish current orders or project launches as investor news during the silent period.

In accordance with the Company's insider guidelines GRK's managers and persons receiving financial information are subject to a closed window before the publication of the interim report, half-year report or financial statements release. Should the financial

statements contain material information that has not been published previously in the financial statements release, the closed window applies also to the financial statements. Closed window applies during the 30-day period prior to the publication of a financial report and on the publication day (30+1). Transactions in the Company's financial instruments during the closed window, either on own account or for the account of a third party, directly or indirectly, are prohibited.

#### **14 INSIDER GUIDELINES**

GRK complies with the Nasdaq Helsinki Guidelines for Insiders, in addition to which the Company has insider guidelines approved by the Board of Directors of the Company.

#### **15 INTERPRETATIONS AND DEVIATIONS, AMENDMENTS AND MAINTENANCE**

The Board of Directors of GRK is responsible for the supervision and interpretation of the Company's disclosure policy. The President and CEO and the CFO of GRK give further instructions regarding the execution of the disclosure policy.

In individual cases, for weighty reasons and within the limits of applicable laws and regulations, the Chairman of the Board of Directors and the President and CEO of the Company together may deviate from the disclosure policy.

GRK's Board of Directors decides on the amendments to this disclosure policy. However, minor or technical amendments to this disclosure policy may be approved by the Management Team of GRK.

This disclosure policy has been prepared Finnish and English. Where conflicts arise, the Finnish-language text shall prevail.