

ENVIPCO HOLDING N.V.

Investor Relations Policy

1. INTRODUCTION

- 1.1 This is the investor relations policy (the **Policy**) that Envipco Holding N.V. (the **Company**) has adopted in accordance with Best Practice Rule 4.2.2 of the Dutch Corporate Governance Code and the Oslo Børs Code of Practice for IR of 1 March 2021 (the **IR Code**).
- 1.2 The Company complies with the IR Code. Any future deviations from the IR Code will be explained as required by the IR Code.
- 1.3 This Policy has been approved by the CEO and shared with the board of directors of the Company (the **Board**) on 10 May 2024.

2. IR TEAM

- 2.1 The Company's investor relation activities are conducted by the investor relations team, consisting of the chief executive officer (CEO) and the chief strategy officer and IR director (CSO). Other spokespersons may be appointed by the IR team at occasion. In certain circumstances the Chairman of the Board may lead interactions with shareholders and the investor community.
- 2.2 The IR team will strive to make itself available and meet with stakeholders, hereunder attend and meet stakeholders at relevant conferences and investor road shows and host open presentations in connection with its financial reporting.

3. COMMUNICATION AND INFORMATION

- 3.1 English is the language used for all investor communications. All financial and other IR information published on the Company's investor website and other formal communications will be published in English. Information related to or relevant to activity in local markets published in social media channels and/or blogs may be published in other local languages, in addition to English.
- 3.2 All disclosure, communication and reporting shall be in compliance with the applicable laws and regulations, in particular the Market Abuse Regulation ((EU) No. 596/2014, **MAR**), the Dutch Financial Supervision Act (*Wet op het financieel toezicht*) the Norwegian Securities Trading Act (*verdipapirhandelloven*), and Euronext Amsterdam's and Oslo Børs' continuing obligations for listed companies. The Company shall also comply with the relevant recommendations and market practices for reporting financial and other IR information.
- 3.3 The Company will seek to ensure that all stakeholders and market participants receive relevant, accurate and precise information related to the Company in a prompt and timely manner to ensure that the Company's share price reflects its underlying values and future prospects. All such information shall be made available meeting requirements for equal treatment of all participants in financial markets.

- 3.4 The Company's communication with the financial markets shall be on an equal treatment basis and in compliance with applicable laws and regulations. Further, communication will be made through public disclosures, news releases, online and physical meetings, presentations and catering to incoming inquiries.
- 3.5 The Company's ability to provide information to individual market participants, including investors and analysts, is limited by regulations applicable to listed companies, including the rules on good stock exchange practices, and the general requirement of equal treatment.
- 3.6 The quarterly, half-year and annual results are reported to the financial markets. These are published on the website and filed with the competent authorities. These are also made available to individual institutional investors.
- 3.7 The Company will at the end of each year publish a financial calendar on the Company's investor website providing an overview of major events such as its annual general meeting and the publication of its annual and interim reports.
- 3.8 The Company shall not publish specific guiding on the Group's future financial results. The Company operates in accordance with a set of financial and non-financial strategic targets, established by the Board. These targets govern the Group's operations within a defined strategic period.
- 3.9 The Company will invoke a silent period of at least three weeks prior to the release of quarterly financial reports. In silent periods contact with analysts, investors and other stakeholders will be minimized and Company spokespersons will make no comments on or discuss matters related to the Company's operations, financial performance or expectations.
- 3.10 The Company will not comment on rumors and/or speculations, especially in regard to share price sensitive matters.

4. CONTACTS AND DIALOGUE WITH SHAREHOLDERS

- 4.1 The Company is committed to have an open and constructive communication with its shareholders and with the financial markets and the investor community. All conversations with shareholders, both in general meetings and on a bilateral basis, form an integral part of this communication process.
- 4.2 Shareholders are expected to be prepared to enter into a constructive dialogue with the Company, and the Company is generally prepared to enter into a dialogue with its shareholders and shall facilitate the dialogue unless, in the opinion of the Board, this is not in the interests of the Company and its operations. The Board will take into account the interests of the Company and all stakeholders when deciding whether to enter into a bilateral conversation.
- 4.3 The Company can request shareholders to provide certain written information in order to assess whether a conversation outside a general meeting would be in the interest of the Company. This information can include the objectives of the conversation, the matters to be discussed and the shareholder's view on these matters, the shareholder's interest (both long and short positions in the Company) and/or further clarification of the shareholder's views, objectives and investment intentions.

5. MEETINGS AND PRESENTATIONS

5.1 As a general rule, the Company shall announce scheduled analyst meetings, analyst presentations, presentations to institutional or other investors and press conferences in advance on the Company's website and by means of press releases. The Company shall endeavor that all shareholders are able to follow these meetings and presentations in real time, by means of webcasting, telephone or otherwise.

5.2 After the meetings, the presentations shall be posted on the Company's website.

6. INSIDE INFORMATION

6.1 The Company is committed to providing high quality, clear, accurate and timely information to all shareholders in compliance with the applicable rules and regulations, in particular those concerning selective disclosure and inside information. The Company has established policies and implemented processes for safe handling of sensitive information to ensure that the Company, its employees and representatives fulfill their obligations with regards to the handling and publication of sensitive information.

6.2 The Company is committed to adhering to its legal obligations relating to confidentiality and the disclosure of inside information and strives to only disclose publicly available information in bilateral contacts. In the event that non-public inside information is inadvertently disclosed during any bilateral contact, the Company will publicly announce such information as prescribed by applicable law.

6.3 Unless exceptions apply and are invoked, the Company shall promptly disclose all inside information (as defined by MAR and the Norwegian Securities Trading Act).