

POLICY ON COMMUNICATION WITH INVESTORS

1. General Principles

DIGI Communications N.V. (hereinafter referred to as "**DIGI**" or the "**Company**") is committed to providing timely, transparent, consistent and credible information on operational performance, financial and non-financial (sustainability) data and corporate strategies to shareholders, investors, proxy advisors, analysts, brokers and investment banks (the "**Investment Community**"), in compliance with applicable laws, regulations and stock exchange rules.

DIGI takes every precaution to disseminate the material non-public information simultaneously through multiple communication channels, in order to avoid providing selective or inside information to any specific party.

In order to maintain consistency and to prevent the unintentional disclosure of material non-public information, all inquiries from the Investment Community should be directed to the Investor Relations team (**the "IR Team**"), available at <u>investor.relations@digi-communications.ro</u>.

This policy regarding the communication between the Company and the Investment Community (the "**Policy**") shall be read in conjunction with the Company's Policy on bilateral contacts with shareholders, adopted in accordance with section 4.2.2 of the Dutch Corporate Governance Code and in line with the provisions of section 4.2 of the Dutch Corporate Governance Code adopted by the board of directors of the Company (the "**Board**").

All interactions between the IR Team or the Company's management and parties from the Investing Community, shall be made in compliance with this Policy, the Company's Policy on bilateral contacts with Shareholders and the applicable laws, regulations, and stock exchange rules.

2. Objectives

The main objectives of this Policy are to:

- 2.1. ensure accurate, timely, and transparent communication of the Company's financial performance, strategic initiatives and material developments;
- 2.2. maintain ongoing engagement with institutional and retail investors, as well as analysts of the Investment Community, through various communication channels; and
- 2.3. comply with regulatory obligations, including the continuous disclosure requirements of the Bucharest Stock Exchange ("**BSE**"), the relevant financial supervisory authorities and EU directives and regulations.

3. Communication Channels

DIGI makes available material non-public information to the Investment Community through the following communications channels:

3.1. **The Bucharest Stock Exchange (online platform/website):** by releasing financial reports (including quarterly, half-yearly, preliminary and annual financial results, in accordance with IFRS Accounting Standards as endorsed by the European Union (EU-IFRS) and Section 2:362(9) of the Dutch Civil Code) and non-financial material developments of the Company, under current reports;



- 3.2. The supervision financial authorities' online platforms (Autoriteit Financiële Markten (AFM) / Autoritatea de Supraveghere Financiara (ASF)): financial reports (including quarterly, half-yearly, preliminary and annual financial results) and non-financial material developments of the Company are published on the supervision financial authorities' online platforms;
- 3.3. **The Company's website:** financial reports (including quarterly, half-yearly, preliminary and annual financial results) and non-financial material developments of the Company are published on the Company's website under section "*Announcements*". Additionally, the Company maintains a dedicated investor relations section on its corporate website, providing access to financial reports, presentations, current reports and other relevant materials;
- 3.4. **Press Releases:** current reports concerning the announcement of publication of financial reports and nonfinancial material developments are additionally disseminated after the publication on the BSE and on the relevant supervision financial authorities' platforms, to local and international journalists.

4. Other forms of direct engagement with the Investment Community

In addition to the communication channels indicated above, the Company interacts with various entities of the Investment Community through the following methods or with the occasion of the following events:

- 4.1. Annual General Meetings (AGMs) or extraordinary general meetings (EGMs) of the Company: shareholders are encouraged to attend and participate in AGMs or EGMs, where they can raise questions and discuss the Company's performance with the Board, in compliance with the provisions of the Company's articles of association;
- 4.2. **Earnings Calls:** DIGI holds earnings calls with representatives of the Investment Community as investors and analysts on a quarterly basis, following the release of quarterly financial results. These conference calls are recorded and the recordings are published in a timely manner on the Company's website, ensuring that all interested entities of the Investment Community have equal access to the same information;
- 4.3. **Investor Roadshows and Meetings:** The Company regularly engages with institutional investors through roadshows, one-on-one meetings and investor conferences. As indicated also in the Company's Policy on bilateral contacts with shareholders.
 - 4.3.1. *Roadshows and Conferences*: DIGI periodically arranges roadshows to major national and international financial centers to meet with entities from the Investment Community, as shareholders and investors. These roadshows are organized to showcase the Company's strategy and previous financial performance. In addition, the Company may participate in conferences hosted by local or international intermediaries and investment banks. DIGI endeavors to accommodate requests from brokers and banks to participate in these events, subject to management schedules and other commitments. During these meetings, the IR Team uses the latest version of the IR presentation, which is also available on the Company's website. No further materials, other than public reports and documents already disclosed to the public, are shared;
 - 4.3.2. *Individual Meetings or Calls*: The Company, through its IR Team or senior management, may participate in individual meetings or calls with participants from the Investment Community, as investors and analysts. These interactions are designed to offer clarifications on publicly available information and discuss the Company's general strategy and performance, in line with the Company's Policy on bilateral contacts with shareholders;



4.3.3. *Small Group Sessions*: DIGI may hold small group sessions, where institutional investors or analysts are invited to participate in discussions regarding the Company's operations and financial performance.

During these interactions, no confidential or non-public information will be shared under any circumstances. DIGI will strictly adhere to its obligation to prevent the selective disclosure of material information. The Company will only provide information that is already in the public domain, ensuring that the Investing Community have equal access to the same information. This Policy ensures that no investor or group of investors is placed in a privileged position or gains an unfair advantage based on access to non-public information.

5. Frequency of Disclosures

- 5.1. DIGI releases its financial results on a quarterly basis. Each set of financial disclosures includes the most relevant financial information. Additionally, the Company issues an interim report that provides summarized financial data and the annual report.
- 5.2. The Company discloses any material non-public information through current reports on the BSE online platform, the relevant supervisory financial authorities, the Company's website and via press releases, in compliance with applicable laws and regulations.

6. Continuous Disclosure Obligations

DIGI complies with the continuous disclosure requirements set by the BSE, the relevant supervisory financial authorities and EU regulations, primarily through current reports. The Company ensures the prompt disclosure of price-sensitive information and any other material developments that may impact the Company's share price or influence investor decision-making. Such information will be disclosed with no delays, but no later than 24 hours from the occurrence of the event or as soon as management becomes aware of it.

DIGI is committed to maintaining transparency and ensuring that the Investment Community is provided with timely and accurate information.

7. Access to Information

The Investment Community has access to the IR Team, at <u>investor.relations@digi-communications.ro</u>. The contact details are continuously posted on the Company's website.

Questions and inquiries submitted to the IR Team will be dealt with in a timely manner, provided they do not request confidential information or any data that cannot be disseminated in compliance with applicable law.

All information shared by the Company with representatives from the Investment Community via email will strictly pertain to publicly available data and will not include any confidential or non-public material information. DIGI ensures timely responses, providing only information that aligns with fair disclosure practices, reinforcing the Company's commitment to equal and fair treatment of all shareholders and market participants.

8. Analyst Reports

To ensure comprehensive coverage and understanding of the Company's performance, DIGI maintains an active working relationship with analysts, investment banks, and credit-rating agencies, regardless of their current views or



recommendations on the Company. While DIGI may review analyst reports or financial models for factual accuracy, the Company does not endorse any analysis or attempt to influence analysts' conclusions.

9. Forward-Looking Statements

As a matter of policy, DIGI does not provide forward-looking statements regarding its financial results. However, to enable the Investment Community to better assess the Company's performance, prospects and future strategy, the Company's management may discuss operational plans and future goals. All statements regarding events or outcomes that are not historical facts are considered forward-looking information. Such statements are based on management's current expectations and are inherently subject to uncertainties and risks.

DIGI advises the Investment Community to exercise caution when interpreting forward-looking statements or information, as various factors and risks, some beyond the Company's control, may cause actual results to differ materially. The Company undertakes no obligation to publicly update or revise any forward-looking information, except as required by law.

10. Market Abuse Regulation (MAR) Compliance

DIGI is fully committed to complying with the Market Abuse Regulation (MAR) as enforced by the EU, which aims to prevent insider trading, unlawful disclosure of inside information and market manipulation. To ensure compliance with MAR, the Company has approved the Insider Trading Policy, available <u>here</u>.

- 10.1. **Inside Information:** means information of a precise nature, which has not been made public, relating, directly or indirectly, to the Company or to the Securities of the Company, and which, if it were made public, would be likely to have a significant effect on the prices of the Securities of the Company or on the price of related derivative financial instruments; Any material information that could affect the Company's share price or impact investors' decision-making will only be disclosed publicly through regulated channels, ensuring equal access to the Investment Community.
- 10.2. **Insider Lists:** DIGI maintains up-to-date insider lists, identifying persons who have access to Inside Information. Any person on the list is informed of his legal and regulatory obligations.
- 10.3. **Closed Periods:** In line with MAR requirements, the Company adheres to closed periods of thirty (30) calendar days prior to the publication of financial results. During these periods, persons with access to Inside Information, including directors and senior management, are prohibited from trading in the Company's Securities, according to the provisions of the Company's Policy on Insider Trading.

11. Compliance and Review

For any further information or questions with respect to this Policy, please contact the Company's IR Team via investor.relations@digi-communications.ro.

A copy of this Policy is published on the Company's website (www.digi-communications.ro). This Policy may be amended by a resolution of the Board. Any amendments will be published on the Company's website.