

## Investor Relations Policy

### Purpose

The purpose of Wirtek's Investor Relations activities is to maintain an open, transparent, and consistent communication with the market and its stakeholders, which at all times, is in compliance with existing disclosure rules and regulations for companies listed on Nasdaq First North Growth Market Denmark.

Wirtek wish to be perceived and respected as a trustworthy company understanding and fulfilling the requirements and needs of the investment community. As such, Wirtek aims at supplying timely, reliable, clear, sufficient, and fact-based communications to the market.

The objectives of the Investor Relations activities are to ensure that:

- ☐ The Wirtek share remains an attractive share with high liquidity and a true and fair market value
- ☐ Wirtek has a diversified owner structure in terms of investment horizon and investment strategy
- ☐ All relevant information is available to both existing and new investors to perform an assessment of Wirtek and its shares

### Disclosure of information and Investor Relation activities

Wirtek will disclose information compliant with regulatory and legal requirements through company announcements to Nasdaq First North Growth Market Denmark.

Further, Wirtek will send out press releases, communicate with journalists and analysts, communicate directly with existing and potential investors, communicate through the company website, and participate in investor presentations. All interested will be able to sign up for the company's e-mail service.

All such communications will be done in compliance with the regulatory and legal requirements.

The communication will be based on the requirements laid out in the Market Abuse Regulation, the Nasdaq First North Growth Market rulebook, the Danish FSA, and in accordance with Danish law, and following internal rules and practices.

The CEO of Wirtek is responsible for the Investor Relations activities.

### Disclosure committee

Wirtek will at all times have a Disclosure Committee responsible for all investor relations activities regarding company announcements and for outlining the rules for additional disclosure through other media. The Disclosure Committee is responsible towards Wirtek's Board of Directors.

### Guidance

Wirtek will supply guidance to the market on expected yearly revenue and EBITDA for the Wirtek Group.

Wirtek will not, more than required in the Market Abuse Regulation and the Nasdaq First North Growth Market rulebook, comment or provide opinions on whether it will meet, exceed, or fall short of the current guidance. In the event analysts or others estimate future revenue or EBITDA values, Wirtek will not comment on such.

### Announcement of orders

Wirtek is committed to a growth strategy and is as such depending on a steady flow of new and renewed orders for its services from new and existing customers.

The Disclosure committee of Wirtek will on a case-by-case basis evaluate incoming orders towards the legal and regulatory requirements in the Market Abuse Regulation, the Nasdaq First North Growth Market rulebook, and other authorities.

Furthermore, Wirtek will evaluate each individual firm and unconditional order towards the following internally defined criteria:

- Wirtek or Wirtek Group companies has received orders from new or existing customers with an expected 12-month revenue value of DKK 1m or more. Wirtek will in such cases publish a company announcement containing the information that Wirtek has received a “large order”. If the large order leads to a change in financial expectations for the fiscal year, the company announcement must state that it contains inside information.
- Wirtek or Wirtek group companies has as examples: (a) received orders below the mentioned threshold but with strategic relevance towards potential future size, technology, market and/or outside Wirtek’s normal business area, or (b) entered into a partner agreement of strategic interest, or (c) received orders below the threshold from new branches of existing global or large-scale customers. In such cases, Wirtek will publish a company announcement holding inside information, that Wirtek has received a “Strategic Order”.

### **Quiet periods and no-comment policies**

Wirtek will observe a quiet period starting 21 days prior to releasing annual and quarterly reports. In this period the release of company announcements will be kept to a minimum as required by the Market Abuse Regulation and Nasdaq First North Growth Market rulebook and Wirtek does not in the period comment on any matters related to financial results or expectations and will not participate in investor meetings.

Wirtek has a firm policy of not disclosing information about sales, staff and or other aspects that may compromise the competitive situation of the company.

Wirtek will not, unless extraordinary situations occur, comment on any prices, movements, or the liquidity of the Wirtek shares.

### **Authorized spokespersons**

Wirtek's Executive Management Board and the Chairman of the Board are the only authorised spokespersons for the company. Other employees may not and will not communicate with the investment community unless authorised to do so by an authorised spokesperson. Only information coming from an authorised spokesperson should be considered relevant for the investment community.

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*This policy has been adopted by the Board of Directors of the Company on 30 August 2023.*