

# Policy on Communication with Investors of AROBS Transilvania Software S.A.

## 1. Commitment to Transparency and Equal Access

AROBS Transilvania Software S.A. (the "Company") is dedicated to offering shareholders, investors, analysts, and other stakeholders timely, accurate, and transparent information about its financial performance, strategic objectives, and key corporate events. All communications align with applicable Romanian laws, the regulations of the Bucharest Stock Exchange (BVB), and other relevant governing bodies.

The Company ensures that no material, non-public, or privileged information is disclosed without simultaneously making it available to the market. Queries from the investment community are directed to the Investor Relations (IR) team via the dedicated email address [ir@arobsgroup.com](mailto:ir@arobsgroup.com) to ensure consistent, transparent, and fair communication.

## 2. Policy Objectives

The core goals of AROBS Transilvania Software's Communication Policy include:

- **Fostering Transparency:** Consistently share the Company's performance, strategies, and financial details without unnecessary delays, in order to ensure accurate communication with the investment community.
- **Enhancing Engagement:** Maintain a proactive dialogue with institutional and retail investors, analysts, and financial institutions to provide equal access to all stakeholders.
- **Meeting Regulatory Standards:** Ensure strict compliance with legal disclosure obligations, including continuous disclosure requirements under Romanian regulations.

## 3. Communication Channels

To facilitate accessibility and transparency, the Company uses several communication methods:

- **Annual General Meetings (AGMs):** Shareholders are encouraged to attend the AGMs, which gives them an opportunity to interact with the Board of Directors and review the company's performance. Participation is possible both physically and remotely using digital voting platforms such as eVote.
- **Financial Reporting:** Quarterly, semi-annual, and annual reports are prepared following International Financial Reporting Standards (IFRS) and are first released through the Bucharest Stock Exchange platform before being made available on the Company's website.

- **Press Releases:** Significant corporate milestones or updates are communicated through press releases and posted on the Company's website.
- **Current Reports:** Material events like mergers, acquisitions, or corporate governance changes are disclosed through current reports filed with the Bucharest Stock Exchange and subsequently on the Company's website.
- **Investor Relations Website:** A dedicated section on the Company's website hosts financial statements, presentations, corporate governance documents, and other investor-focused materials and offers the possibility of subscribing to the newsletter for investors.
- **Earnings Calls:** Quarterly financial results are followed by investor and analyst calls. These calls are recorded, and their availability is announced through a current report, with recordings accessible to all interested parties.
- **Roadshows and Conferences:** The Company actively participates in meetings with institutional investors and international conferences to communicate its strategies and performance.
- **Social Media:** The Company may use official social media channels to share key updates and engage with a wider audience, ensuring compliance with ongoing disclosure requirements and related legal obligations.
- **Newsletter for investors:** regular updates regarding the Company's financial performance, market developments and other relevant information.
- **Email address dedicated to investor relations:** [ir@arobsgroup.com](mailto:ir@arobsgroup.com) - essential channel for questions, clarifications or requests for information from investors. This is specified in the investor relations section of the Company's official website.

#### 4. Financial Disclosure Schedule

AROBS Transilvania Software reports its financial results quarterly, as per the financial calendar announced each January through a current report. Each disclosure provides comprehensive insights into the Company's revenues, profitability, and other financial metrics, with preliminary annual reports offering concise interim summaries.

#### 5. Commitment to Continuous Disclosure

The Company adheres to strict continuous disclosure obligations, promptly communicating price-sensitive developments in compliance with Romanian laws and BVB requirements. This ensures equal and timely access to critical information for all investors.

#### 6. Participation to Roadshows

To foster transparency and maintain an open dialogue, AROBS Transilvania Software takes part in investor roadshows and conferences. During these sessions, management presents financial results, strategic

initiatives, and development plans. Materials shared are based on publicly available information, in order to uphold compliance and equal access to information of all investors.

## 7. Engagement with Investors

The Company values interaction with the investment community and ensures such engagements adhere to fair and consistent practices regarding disclosing information. Investor interactions may take the following forms:

- **Direct Meetings and Calls:** Management and the IR team clarify publicly available information and discuss strategy without revealing any confidential or non-public data.
- **Group Discussions:** Small sessions with investors or analysts provide focused insights, while also following legal obligations regarding the disclosure of information.
- **Public Presentations:** Updates on the Company's market performance, strategic direction, and growth plans are shared in conferences, based solely on publicly disclosed information.
- **Email address dedicated to investor relations:** [ir@arobsgroup.com](mailto:ir@arobsgroup.com) - essential channel for questions, clarifications or requests for information from investors. This is specified in the investor relations section of the Company's official website.

During these events, no privileged or non-public information will be disclosed. Any inquiries requiring disclosure of such information will be directed to official public communication channels to comply with market regulations.

## 8. Relations with Analysts

AROBS Transilvania Software fosters positive relationships with financial analysts, ensuring accurate and consistent sharing of performance-related information. While the Company may review reports for factual accuracy, it does not influence analysts' opinions or recommendations.

The Company does not undertake responsibility for the accuracy of the information in the analysis reports or other materials prepared by third parties, which are carried out independently. If errors or inconsistencies are identified, the Company may, to the extent possible, contact the analyst to report the inaccuracies. However, their correction depends solely on the decision of third parties. The Company has no obligation to ensure the implementation of corrections or to clarify inaccurate information produced by third parties. Investors are responsible for verifying the sources of information used in making decisions.

## 9. Fair Disclosure Practices

The Company commits to fair disclosure of information regarding its activity, by ensuring all stakeholders have simultaneous access to the same information. No confidential or non-public information is shared during private discussions or correspondence. Inquiries requesting such data are respectfully declined.

In all cases, the Company remains compliant with applicable disclosure rules and regulations, ensuring a level playing field for all market participants

## 10. Forward-Looking Statements

While the Company generally avoids providing forward-looking statements, management may discuss general plans and long-term objectives to offer stakeholders an understanding of strategic direction. The Company advises all stakeholders that actual results may differ from these forward-looking statements due to various factors. These insights are subject to uncertainties, and the Company is under no obligation to update these statements unless required by law.

## 11. Compliance with Market Abuse Regulations (MAR)

**Confidentiality of Insider Information:** The Company enforces rigorous policies and procedures to safeguard insider information from unauthorized disclosure. Any significant information with the potential to influence the Company's share price or impact investor decisions is shared publicly only through authorized and regulated channels, ensuring equal access for all stakeholders.

**Management of Insider Lists:** The Company keeps detailed and up-to-date insider lists, documenting all individuals with access to insider information. These lists are routinely monitored for compliance with MAR regulations, and all listed individuals are made aware of their legal and regulatory responsibilities.

**Closed Trading Periods:** In compliance with MAR requirements, the Company enforces 30-day closed periods prior to releasing financial results or announcements containing insider information. During these times, individuals with access to such information—including Persons Discharging Managerial Responsibilities (PDMRs), directors, senior management, and employees involved in financial reporting to the Bucharest Stock Exchange—are prohibited from trading the Company's securities. Closed periods are communicated via market reports and internal notifications, such as emails to those listed as insiders.

**Commitment to Preventing Market Manipulation:** AROBS Transilvania Software is firmly dedicated to avoiding any actions by the Company, its employees, or related parties that might be perceived as market manipulation. This includes refraining from distributing false or misleading information or engaging in activities that could distort market pricing.

## 12. Accessing Investor Relations Resources

The Investor Relations section of the Company's website, available [HERE](#), provides comprehensive resources, including financial reports and presentations. The IR team is available via [ir@arobsgroup.com](mailto:ir@arobsgroup.com) for prompt responses to inquiries, in compliance with the applicable legal provisions.