

EP GROUP POLICY

Market Abuse Policy

1. DEFINITIONS

For the purposes of this Policy, the capitalized terms listed below are defined as follows:

Financial Instrument	means a transferable security and other instruments defined by applicable law admitted to trading on a regulated market;
Issuer	means a legal entity governed by private or public law, which issues or proposes to issue Financial Instruments;
Regulation	means Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse;
Policy	means this Market Abuse Policy;
Company	means EP Group, a.s.;
EPG Group Company	means any company which forms part of the EPG Group;
EPG Group	means EP Group, a.s. and all companies directly or indirectly controlled by it;
Inside Information	means information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more Issuers or to one or more Financial Instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those Financial Instruments;
Employee	means all employees and senior managers of EPG Group Companies, as well as any member of the governing bodies of the EPG Group Companies, and any person working for the EPG Group Companies on a contractual basis;
Insider	means a person who possesses Inside Information.

2. PURPOSE OF THE POLICY

The purpose of this Policy is to ensure that EPG Group's activities comply with all applicable laws and regulations designed to protect investors and safeguard the proper functioning and integrity of financial markets. The applicable legislation prohibits Insider dealing, unlawful disclosure of Inside Information and market manipulation; by issuing this Policy, EPG Group undertakes to make every reasonable effort to prevent such prohibited activities.

3. SCOPE OF THE POLICY

This Policy applies to all Employees and to all countries and territories in which the EPG Group Companies operate.

The provisions of this Policy may continue to apply to an Employee after they cease working for the EPG Group.

4. INSIDE INFORMATION

For the purposes of this Policy, 'Inside Information' is defined in Section 1 above, and the criteria of its precise nature and likely significant effect on the prices of Financial Instruments are set out in more detail in Article 7 of the Regulation.

In the course of its operations, the EPG Group, and in the performance of their duties, its Employees may come into possession of Inside Information relating to any EPG Group Company, as well as to other Issuers, such as suppliers or competitors of the EPG Group Companies. This Policy also applies to such situations.

Inside Information may include, for example, financial, commercial or strategic information, as well as information concerning cyber security incidents, administrative, judicial and other proceedings, accidents or discoveries involving an Issuer, whether the Issuer is an EPG Group Company or a company outside the EPG Group.

In addition to complying with the obligations set out below regarding Inside Information, each EPG Group Employee is required to strictly protect the confidentiality of information relating to the EPG Group in their possession, even if such information does not constitute Inside Information within the meaning of this Policy, and to strictly follow the EPG Group's internal rules applicable to such information.

5. PROHIBITIONS TO PREVENT MARKET ABUSE

5.1. Prohibition of Insider Dealing and Recommending Insider Dealing

A person shall not engage or attempt to engage in Insider dealing, or recommend that another person engage in Insider dealing or induce another person to engage in Insider dealing.

Insider dealing arises where a person possesses Inside Information and uses that information by acquiring or disposing of, for its own account or for the account of a third party, directly or indirectly, Financial Instruments to which that information relates. The use of Inside Information by cancelling or amending an order concerning a Financial Instrument to which the information relates where the order was placed before the person concerned possessed the Inside Information, shall also be considered to be Insider dealing.

5.2. Prohibition of Unlawful Disclosure of Inside Information

A person shall not unlawfully disclose Inside Information.

Unlawful disclosure of Inside Information arises where a person possesses Inside Information and discloses that information to any other person, except where the disclosure is made in the normal exercise of an employment, a profession or duties. Such permitted disclosure must be closely connected with and necessary for the ordinary performance of an employment, profession or duties, i.e. it must be limited exclusively to persons who need to know the Inside Information in order to achieve, through their activities or performance of duties, the purpose intended by such disclosure.

5.3. Prohibition of Market Manipulation

A person shall not engage in or attempt to engage in market manipulation, including, but not limited to, disseminating information through the media, including the Internet, or by any other means, which gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of, a Financial Instrument, or secures, or is likely to secure, the price of one or several Financial Instruments at an abnormal or artificial level, including the dissemination of rumours, where the person who made the dissemination knew, or ought to have known, that the information was false or misleading.

6. INSIDE INFORMATION OF THE EPG GROUP

Where the Inside Information directly concerns an Issuer that is an EPG Group Company, that EPG Group Company is also subject to the following obligations:

- a) to inform the public as soon as possible of the Inside Information unless the conditions for deferring the disclosure of the Inside Information are met;
- b) to draw up a list of Insiders who have access to Inside Information and to promptly update this Insider list;
- c) to have in place appropriate internal procedures for its Employees to report infringements of the Regulation.

7. MANAGERS' TRANSACTIONS

Persons discharging managerial responsibilities and persons closely associated with them are required to report any transaction conducted on their own account involving Financial Instruments of an Issuer that is an EPG Group Company.

8. SANCTIONS

In the event of a breach of this Policy, the EPG Group will impose sanctions on the Employee in accordance with applicable law and the relevant contract documents.

A breach of this Policy or applicable law may result in proceedings before administrative or judicial authorities, which may impose administrative and criminal sanctions, including imprisonment.

9. IMPLEMENTATION

In order to support the EPG Group in mitigating financial, regulatory and reputational risks and to ensure regulatory compliance in accordance with the Policy, each EPG Group Company is responsible for implementing the measures and procedures set out in this Policy that are necessary and appropriate given its profile and nature of its activities. In doing so, the EPG Group Companies shall implement this Policy in such a way as to establish all processes and rules in accordance with this Policy and the Regulation, thereby ensuring compliance with the obligations arising from the Regulation, including related obligations concerning measures to prevent market abuse.

10. FURTHER OBLIGATIONS OF EMPLOYEES

All Employees are required to read, understand and comply with this Policy. Senior managers are required to actively support the implementation of this Policy.

Each Employee is responsible for ensuring that their conduct complies with this Policy. In the event of any uncertainty or doubt, Employees are encouraged to contact the EPG Group Compliance Officer. The

‘Ten Commandments against Market Abuse’, which form Annex 1 to this Policy, may serve as a guide to help Employees understand the key principles of this Policy.

The EPG Group and its Employees are subject to various obligations regarding the content of information disclosed and the means by which it is communicated. For this reason, it is strongly recommended that the EPG Group Employees do not publish information regarding the nature and details of their work for the EPG Group on their private social media accounts.

11. FINAL PROVISIONS

The EPG Group Companies shall ensure that the Policy is duly communicated to all Employees.

Employees’ exposure to the risk of breaching market abuse rules varies significantly depending on their role. Employees who, due to their roles, are particularly exposed to this risk of market abuse must be informed by the EPG Group Companies of the associated risks and the key principles they are required to follow. The EPG Group Companies will assess which Employees are affected by these aspects and, where necessary, ensure that such Employees receive regular training on this topic. The frequency and scope of such training shall be determined by the EPG Group Companies.

The EPG Group is introducing appropriate internal procedures for its Employees to enable them to report breaches of the Regulation and this Policy through its internal whistleblowing system. Reports may be submitted in writing, via a secure web interface; further details on submitting reports and on this internal whistleblowing system are set out in the Company’s Whistleblowing Directive. This system is available to all Employees and business partners of the EPG Group and operates alongside any appropriate internal procedures established by an Issuer that is an EPG Group Company, as referred to in Section 6(c) of this Policy.

Where applicable law prescribes a stricter rule, restriction or obligation than that set out in this Policy, that stricter rule, restriction or obligation shall take precedence over the provisions of this Policy.

Annexes: Annex 1 – The Ten Commandments against Market Abuse

Approved by the Board of Directors of EP Group, a.s. on 25 May 2026.