

**INVESTOR COMMUNICATION POLICY**  
**ROCA Industry Holdingrock1 S.A.**

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## I. Introduction

ROCA Industry Holdingrock1 S.A. (hereinafter referred to as “ROCA Industry” or the “Company”) reaffirms its commitment to transparent, fair, complete and timely communication with all stakeholders, including the Company’s shareholders, investors, and financial analysts. This policy aims to define the framework, principles and responsibilities related to the investor communication process, aligning with the best practices applicable to listed companies. The policy is developed to ensure compliance with capital market regulations, avoid selective disclosure of information, and support informed decision-making by investors.

The policy applies to all members of the board of directors, executive directors, and employees of ROCA Industry.

## II. Objectives and Principles

The main objectives of the policy include:

- provide clear, accurate and transparent information on the activity of the Company and the Group (defined as the Company and its subsidiaries), including on its strategy, performance, and development directions, to facilitate a complete understanding of its performance and prospects,
- increase investor confidence and satisfaction by promoting open dialogue and constant interaction,
- ensure equal access to information for all capital market participants and their active involvement,
- ensure fair treatment of inside information, in accordance with the specific provisions applicable, to prevent illegal insider trading and its unauthorised disclosure,
- compliance with applicable law, including continuous disclosure obligations.

## III. Communication Channels

To ensure proper management of the communication process with investors and analysts, ROCA Industry has a specialised Investor Relations (IR) department that coordinates all communication activities on the capital market. The role of the IR department is to review all information prior to publication, ensuring its compliance with applicable regulations. This department also monitors the internal and external flow of information, to prevent accidental or unauthorised disclosure of sensitive information.

ROCA Industry uses multiple channels to communicate with investors, including:

- The company’s **official website**, which contains a section dedicated to investors, where financial reports, current reports, investor presentations and recordings of quarterly conference calls, corporate governance issues and other relevant materials are published,

- **The monthly newsletter** sent to all stakeholders who have expressed an interest in receiving information about the Group's companies,
- **Financial** (annual, half-yearly, quarterly) and non-financial **reports**, which the Company publishes in accordance with regulatory requirements,
- **Quarterly conference calls** organised to present the Company's financial results and strategy,
- **Current reports** published on the Bucharest Stock Exchange and on the Company's website, through which all stakeholders are informed about important aspects of the Group's activity, about corporate events, financial results, etc.,
- **Press releases** through which information on the company's activity is constantly disseminated to the widest possible audience,
- **Roadshows and meetings with** retail and institutional **investors**,
- **General Meetings of Shareholders**, where shareholders can interact with the members of the Board of Directors either directly or remotely, via eVote,
- **Social media platforms**, used to disseminate important information to stakeholders.

The Company ensures the uniform distribution of information across all communication channels, avoiding selective or preferential disclosure. Any communication between the Company's management, shareholders, investors, and analysts will comply with this policy, as well as all applicable laws and regulations in Romania.

#### **IV. The Company's Representatives in Relation to Investors and analysts**

The representatives of ROCA Industry, responsible for communication with analysts, shareholders, investors, and capital market regulators are the Chairman of the Board of Directors, the General Manager, the Chief Financial Officer, and the IR Director.

Members of the Board of Directors, other executive directors, and employees, may be specifically authorised by one of the above-mentioned representatives to represent the Company before investors.

#### **V. Insider Trading and Selective Disclosure Management**

The Company manages privileged information according to the European and national regulations in force, having in force a policy on the management of this type of information. Inside information is defined as information of a precise nature that has not been made public, which directly or indirectly relates to ROCA Industry, and which, if made public, could significantly influence the share price. If the Company has such information, the IR Department prepares the current report and publishes it, as soon as possible (but not later than 24 hours from the time the event took place), through the Bucharest Stock Exchange, the FSA and the Company's website, where it will be kept for a period of at least ten years.

No person who, by the nature of their business, has access to inside information is permitted to use or disclose it for their own purposes. Disclosure of this information to a person or group of persons, including analysts and investors, is considered selective disclosure and is illegal and prohibited.

In the unlikely event that an unintentional selective disclosure is identified, the IR Department shall ensure that the relevant information is disseminated to all interested parties through a current report published on all regulated channels.

#### **VI. Rumour Management**

In case of rumours or incorrect information in the press or online, the Company will react promptly by publishing its point of view by means of a current report and, if necessary, by organising a press conference. ROCA Industry maintains its commitment to transparency by ensuring that accurate information is accessible to the public in a timely manner.

#### **VII. Interaction with Analysts and Investors**

The company maintains an active dialogue with financial analysts and investors, respecting the principles of equality and transparency. In one-to-one meetings, information that is not already public is not disclosed.

ROCA Industry representatives do not organise informal meetings with investors and analysts and do not issue unofficial comments. Responses to questions regarding ROCA Industry's revenue, profits, and other estimates will be limited to the Company's forecasts and estimates already publicly disclosed. In any interaction with stakeholders, the Company's representatives use simple, clear, easy-to-understand, and concise language.

No unauthorised employee of the Company responds to questions asked by investors or analysts unless the answer has been validated by one of ROCA Industry's representatives in relation to investors.

To ensure consistency and compliance, all requests from shareholders or the investor community should be directed to the Investor Relations Department at [investors@rocaindustry.ro](mailto:investors@rocaindustry.ro). Feedback from investors is fostered, and their queries are promptly resolved through dedicated channels.

#### **VIII. Forward-Looking Statements**

The Company will not publish estimates or forecasts of the type of forecasts (i.e., quantified conclusions of studies aimed at determining the total impact of a list of factors relating to a future period). However, ROCA Industry can offer:

- statements regarding its operational strategy and long-term objectives, to support investors and analysts in the process of understanding the Group's direction. These statements are based on estimates from time to time and may be subject to risks and uncertainties, and the Company is not obligated to update them unless required by law,

- forward-looking financial information, such as income and expenditure budgets, expected investment levels, prospects for future added value creation resulting from new investments at Group level, the Company's prospects, including growth (organic or inorganic) intentions, plans to explore future growth opportunities, expectations regarding the macroeconomic impact on the Group's business, risks, uncertainties, whether known or unknown, many of which are beyond the Company's control and all are based on current assumptions and estimates regarding the future.

In preparing forward-looking financial information, the Company's management will use reasonable efforts to ensure that the assumptions and scenarios used are appropriate and provide realistic estimates of expected future financial results or impact on the Company's financial position and performance.

If ROCA Industry's management determines that future results may deviate significantly from the previously issued estimate, the information will be disclosed by means of a current report or a financial report, which will also include the reasons behind the recorded or expected deviations.

#### **IX. Regulatory compliance**

The Company complies with the Market Abuse Regulation (MAR) and other relevant regulations. Internal procedures include maintaining up-to-date lists of insiders and monitoring compliance with closed trading periods. All published information is communicated in accordance with capital market legislation.

#### **X. Policy Review**

The investor communication policy complies with the laws of Romania and the rules of the Bucharest Stock Exchange, being reviewed annually by the Board of Directors to ensure compliance with the regulations in force and to integrate the good practices of the capital market. Any significant changes will be disclosed publicly.