



INVESTOR RELATIONS COMMUNICATION POLICY

Approved in the meeting of the Board of Directors of the Company dated 11.05.2026



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Companie de Familie

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1. Policy

General

Cris-Tim Family Holding SA („Cris-Tim” or the „Company”) is committed to publishing inside information in a fair manner, without favouring an interested party, in accordance with the applicable legislation in the field of capital markets.

The "EU Regulation no. 596/2014 on market abuse (MAR)" prohibits the selective disclosure of inside information to certain persons, and is intended to eliminate situations in which Cris-Tim may disclose important information that is not public to securities analysts or certain investors before disclosing the information to the general public.

The members of the board of directors and the executive management of the company consider that it is in Cris-Tim's interest to maintain an active and open dialogue with shareholders, other investors, securities market professionals (such as brokers, dealers and investment advisors), investment companies and analysts, regarding the historical performance and future prospects of Cris-Tim. Cris-Tim believes that it can best bring value to its shareholders by publishing its strategies, strengths and growth opportunities and actively engaging in dialogue about them, while protecting the necessary confidentiality regarding key business strategies and plans and operations.

Objectives

The objectives of this Policy are:

- **Compliance Commitment:** Strengthening Cris-Tim's commitment to complying with the continuous communication obligations imposed by the Romanian capital market laws and the rules and regulations of the Bucharest Stock Exchange.
- **Ensuring the quality of information:** Ensuring that all communications to investors regarding Cris-Tim's activity and business are:
 - (a) with informative, fact-focused, prompt and accurate content;
 - (b) and communicated in accordance with all applicable legal and regulatory requirements.
- **Equal access to information:** The commitment to publish and permanently update the Investor Relations Communication Policy taken in order to comply with the provisions of the laws, rules and regulations, as well as to ensure that accurate information regarding Cris-Tim is provided equally to all shareholders and participants on the capital market;
- **Inside Information:** Ensuring that all persons to whom this policy is addressed understand the obligations to maintain the confidentiality of inside information, namely:
 - to prevent illegal insider trading and unauthorized disclosure;
 - to regulate the modalities of notifying insider persons of applicable legal obligations and regulations, as well as to inform them of the sanctions applicable to illegal insider trading and unauthorized disclosure;
 - to notify the persons in management positions of their legal obligations;



- to periodically notify the persons who have access to privileged information regarding the prohibition of trading the shares issued by Cris-Tim.

- **Effective communication:** Promoting efficient, effective and proactive communication with shareholders and encouraging their participation in general meetings

Thus, this policy applies to all members of the board of directors, executive directors and employees of Cris-Tim, including persons who are authorized, at any given time, to represent Cris-Tim to investors and analysts and, to the extent possible, collaborators, consultants and any other persons who may have inside information regarding Cris-Tim.

This policy outlines the main methods used by Cris-Tim to communicate with investors and analysts, such as documents filed with financial supervisory authorities, written statements in Cris-Tim's annual reports, financial statements, letters and responses to investors and analysts, presentations given by management, and information published on Cris-Tim's website. It also covers verbal statements made both at group and individual meetings or in telephone discussions with shareholders, analysts and potential investors.

2. Internal Structure for Investor Relations Communication

2.1 General

The policy has been reviewed by the Consultative Management Committee set up by way of Decision no. 3 of 27.04.2026 of the General Manager of the Company (the „**Management Committee**”) and approved by the Board of Directors. The Management Committee is responsible for this policy, including recommending any material changes to it and ensuring compliance with it. To this end, the responsibilities of the Management Committee include the following:

- decide whether or not information that is not public may have an impact on the share price and when changes require public disclosure;
- ensuring compliance with applicable regulatory requirements regarding the disclosure of inside information;
- monitoring compliance with this Communication Policy in relation to investors;
- advising the members of the board of directors, executive directors and employees of Cris-Tim on transparent communication issues in the relationship with investors and analysts and on this policy;

For the purpose of preparing the relevant documents, the members of the Management Committee are responsible for preparing the controls and disclosure procedures, establishing the procedures and modalities for the control of the communication, which are specified in Chapter 4.

2.2 Committee for the evaluation of the level of transparency in external communication

Taking into account the applicable regulations on the immediate disclosure of inside information and any changes to such regulations, this investor disclosure policy is administered and interpreted by the Management Committee, coordinated by the Chair of the Committee, as described below.



Component

The Committee shall have 5 (five) members and a secretary. The members of the Management Committee are the CEO, the Deputy CEO, the Chief Operational Officer (COO), the CFO and the Production Manager of the Company.

President

The CEO is appointed as Chairman of the Committee. In the absence of the CEO, the members present at the meeting will elect one of them to chair the meeting.

Secretary

The Secretary is not a member of the Committee. He/she is responsible for keeping records of the Committee's work. The Secretary organizes all meetings of the Committee, prepares the agenda, prepares and transmits the relevant drafts and supporting documentation, and keeps the minutes of the meetings and decisions of the Committee.

Committee Invitations

Members of the board of directors, executive directors, other employees or any external professional advisor may be invited to participate in the meetings if deemed necessary, depending on the topics discussed.

Attributions

- The main task of the Management Committee in relation to this Policy is to ensure the dissemination to all interested parties of inside information that relates directly to the company (through specific transmission systems) as soon as possible so as to comply with the regulated disclosure obligations (including in accordance with the Market Abuse Regulation - MAR). The Management Committee must assess any information disclosed to it or known by any other means (i.e. sensitive issues, which have not been addressed in previous cases, and not specifically mentioned in the provisions of the capital markets legislation) and decide whether this information **constitutes inside information** or **whether it has become such information**. The Management Committee must also assess the company's need to create new insider lists or amend its existing lists.
- In order to fulfil this role, the Management Committee will have the following non-exhaustive tasks:
 - assesses the status of 'inside information' in accordance with the MAR Regulation Article 7;
 - establishes the company's right to postpone the publication of inside information;
 - in general, advises, if deemed necessary by the IR service, on the scope and content of any disclosure. This activity includes supervising the preparation of presentations for investor conferences and rating agencies and the material aspects included in correspondence with investors and analysts;
 - provides support in matters communicated to shareholders, investors, rating agencies and analysts including inside information, if assistance is requested by the IR service;



- with the assistance of the IR team, monitors market news and media speculation that includes information that could be privileged and analyzes whether it is necessary to issue a current report through an 'official report storage mechanism';
- monitors any changes in the company's circumstances and assesses whether they give rise to the obligation to issue a current report by means of a 'formal reporting mechanism' and, in particular, monitors any variation between the company's performance and its own forecasts, as well as analysts' expectations of the company's performance, assesses the materiality of these variations and whether they constitute inside information and recommends the necessary measures to ensure that the company's performance is carried out. be taken;
- immediately informs all executive directors and employees who, by the nature of their work, must have access to information and who are not present at that meeting of the Board of any decision to issue a current report through a 'formal reporting mechanism';
- ensure that the company's insider handling procedures are adequate to allow for the effective dissemination of information to the Committee;
- assesses which executives, employees or collaborators should be on the insider list prepared and permanently updated by the company;
- take any other measures it deems appropriate to ensure that the company complies with regulatory obligations in relation to insider disclosure and the maintenance of insider lists;
- ensure that all decisions of the Committee and any procedures are preserved to ensure the effective dissemination of information; and
- review and, if necessary, propose amendments to these general aspects of the Committee.

Authority

The Committee or any individual member shall have full access to all records, records (, facilities and personnel, including external auditors and attorneys. The Committee or any individual member has the authority to request representatives of the company's external auditors, internal audit and/or external legal counsel to attend any meeting or part thereof or to meet with the members or consultants.

2.3 Representatives in the relationship with investors and analysts

Cris-Tim's representatives, responsible for communicating with analysts, shareholders, potential investors and capital market regulators, are the CEO, CFO, CCDO and the representative of the internal or outsourced IR Service.

The members of the board of directors and employees, other than the designated representatives, must not answer under any circumstances the questions received from investors, analysts, capital market regulators, unless they are specifically authorized by one of the representatives identified above (by e-mail).



3. Information: inside information and how to manage that information

3.1 Inside information

Inside information means any information relating to Cris-Tim's business and operations that result in or could reasonably lead to a material change in the market price or value of any of Cris-Tim's securities or that is expected to have a material influence on an investor's investment decision.

Inside information includes, but is not limited to:

- significant changes in assets or major operations;
- financial performance and its significant change;
- dividend policy;
- reorganization;
- business and strategic plans;
- acquisitions and sales of major business segments;
- important changes in executive management and the board of directors;
- public or private sale of securities;
- borrowing a significant amount of funds;
- conclusion or loss of significant contracts;
- takeover offers; and
- any other changes in Cris-Tim's business and operations that could reasonably be expected to significantly affect the price or market value of Cris-Tim's securities or that could have a material influence on investors' decisions to invest.

3.2 Confidentiality of information

All persons who have access to confidential information ("data subjects") have a legal obligation not to disclose confidential information to other employees of Cris-Tim who are not authorized to have access to it and other third parties to Cris-Tim, unless disclosure is necessary as a result of their current activity, or required by law or permitted by this Policy. In addition to the legal requirements, the data subjects must comply with the following:

- not to discuss Cris-Tim's activity in places where the discussion can be listened to by persons not authorized to hold information;
- confidential documents will not be read, displayed in public places or thrown into spaces where they can be retrieved;
- documents and files containing confidential information must be kept in a secure place with restricted access;
- visitors will be accompanied by Cris-Tim staff to ensure that they are not left alone in offices or spaces containing confidential information;



- documents containing confidential information should be removed immediately from conference rooms and work areas after the end of meetings, and additional copies of confidential documents should be destroyed; and
- Every effort will be made to limit access to confidential information, so that only persons who need to know that information have access, and these persons must be warned that the information must be kept confidential.

External parties who receive confidential information not disclosed in the course of their activity in relation to Cris-Tim must confirm the confidentiality commitment by a written agreement to this effect.

3.3. Selective disclosure

All data subjects have the legal obligation not to disclose confidential information to persons outside Cris-Tim who are not subject to a confidentiality obligation. No person is permitted to use or disclose inside information for their own purposes. Disclosure of such information (confidential and/or privileged), which has not been publicly disclosed, to a selected person or group, including investment analysts, investors, other market professionals, is considered selective disclosure. Selective disclosure is illegal and prohibited.

3.4. Unintentional selective disclosure

If an unintentional selective disclosure has occurred, the Management Committee must be notified immediately, through its secretary or the Head of the IR Service. The Committee must meet immediately (physically or electronically), analyze the situation and immediately take all appropriate measures.

3.5. Correction of previously released insider information

If the previous publication of information through a current report contains an erroneous presentation, after conducting a reasonable investigation regarding the information that was erroneously published, the head of the IR service will ensure that a current report is issued to correct the erroneous information and that appropriate notifications will be made to the Bucharest Stock Exchange and the Financial Supervisory Authority.

4. Communication procedures and related controls

4.1 Publication of current reports and other public documents for the attention of investors and analysts

The Committee will determine whether certain inside information is to be disclosed and when the disclosure is to be made.

- **Current reports:** Generally, the responsibility for controlling communication lies with the CFO. Depending on the content of the current report, in addition, the responsibility for the content and control of the communication also lies with the responsible executive director (manager) or the board of directors.
- **Annual and Interim Report Reports:** For the annual report and interim reports, the CEO/CFO/Board of Directors are responsible for controlling disclosure.

- **Questions asked by investors:** The answers to the questions are formulated by the relevant departments, at the request of the IR service. The IR receives the responses proposed by the departments concerned, and the CFO approves the final form of the responses, with the support of the Committee, if necessary (only in sensitive cases, when support is requested by the CFO or the IR service).

4.2 Insider Disclosure Procedures

The IR service prepares the current report and publishes, as soon as possible (but within less than 24 hours from the time the event occurred or from which the IR service was notified of such information), the inside information that relates directly to the Company: The current report will be published in a manner that provides quick access and a full assessment, correct and prompt information by the public. When the IR team has been notified about the need to publish a current report, it informs all impacted/involved Departments.

4.3 Principles of transparent communication

In accordance with the requirement to disclose all inside information in a timely manner according to the applicable legislation, the company's staff will comply with the following basic principles regarding transparent communication:

- **Immediate Notice:** Subject to the terms of this Policy, inside information will be published immediately.
- **Non-speculative and factual communication:** The communication must be factual and non-speculative and must include any information whose omission would cause the rest of the communication to be unclear.
- **Compliance with applicable regulations:** The communication of corporate information must comply with applicable legal and regulatory requirements.
- **Prompt disclosure of adverse insider information:** Adverse insider information should be disclosed as quickly and completely as possible in a manner comparable to the publication of adverse information.
- **Impermissible Insider Disclosures:** If inside information has previously been inadvertently disclosed, this information should be disclosed immediately by current report.
- There will be no informal meetings with investors and analysts and there will be no „unofficial” comments. The company will not hold any "informal meetings" or comment "unofficial".
- **Equal access to inside information:** All investors must have equal access to inside information. Selective disclosure is prohibited.
- **Plain language:** All Cris-Tim representatives in relations with investors and analysts must use the principles of plain language when preparing the communication, including, but not limited to: using short sentences, not using worthless words, preparing documents presented in clear, easy to understand and concise language, avoiding any jargon words or abstract terms, Not using template forms.



4.4 Answering questions

No employee of Cris-Tim (other than authorized representatives) may answer questions posed by investors or analysts, unless they are specially authorized to do so by a member of the Management Committee.

Questions posed by analysts, shareholders or investors received by any employee should be forwarded to the head of the Investor Relations Service. It will be established in advance whether it is intended to communicate inside information. In this case, the inside information must be communicated before, or simultaneously with, the transmission of the response to the applicant, by issuing a current report.

4.5 Forecasts and estimates

Cris-Tim publishes the results for the previous periods and the budget for an explicit period of one year.

Any other forecasts or estimates that will be made public (if any), with the exception of the annual budget, will be published in the annual reports.

If the Company chooses to disclose information regarding forecasts or estimates (only in exceptional circumstances) in documents, speeches, conference calls, or press releases, the following recommendations will be followed:

- The information, if considered inside information, will be disseminated through a current report in accordance with this policy.
- The information will be clearly identified as forecasts or estimates.
- The factors and assumptions used to make predictions or estimates should be clearly described.
- The information will be accompanied by a statement that identifies, in specific terms, the risks and uncertainties that could cause actual results to differ materially from those anticipated.
- The information shall be accompanied by a statement disclaiming the Company's intention or obligation to update or revise its forecasts as a result of new information, future events or otherwise, unless applicable capital market law provides otherwise.

4.6 Keeping records of inside information disclosed to the Chief of the IR Service or another designated person shall maintain:

- record for a period of ten years of all documents prepared and published regarding the investor relations activity;
- copies of all minutes of meetings and decisions of the responsible parties; and
- copies of transcripts of conference calls, notes from meetings with analysts and investors, and analysts' reports on Cris-Tim.



4.7 Trading restrictions

It is illegal for someone to buy or sell securities of a listed company knowing inside information that affects the issuer and that has not been publicly disclosed. Unless the disclosure is made as a result of the nature of the activity carried out, it is illegal for a person to communicate inside information to other persons.

4.8 Quiet periods

In order to avoid the potential for selective disclosure or even the perception or occurrence of selective disclosure, the Company will observe a *quiet period* beginning 30 days prior to the publication of quarterly (or annual) financial results. During this waiting period, no comments will be provided on the operations or results of that quarter.

During the silence period, Cris-Tim will not initiate any meeting or telephone contact with investors, analysts or rating agencies, but will respond to questions received regarding matters of fact, based on public or non-privileged information. If Cris-Tim is invited to participate, during a period of silence, in meetings or conferences with investors and analysts organized by third parties, the Committee will determine, on a case-by-case basis, whether it is appropriate to accept these invitations. In case of acceptance, extreme caution will be exercised to avoid selective disclosure of inside information.

5. Relationships with selected groups

5.1 One-on-one meetings with analysts and investors

In general, discussions with analysts and investors (face-to-face or by telephone) should be limited to explanations or clarifications of publicly disclosed inside information or other non-privileged or non-confidential information. Cris-Tim must provide, verbally or in writing, the same information to any person who requests it.

5.2 Conference calls, web conferences, presentations

Conference calls and web conferencing

Telephone conferences and/or web conferences will be organized and held quarterly, in order to present the financial results. Other conferences may be organized, if deemed necessary by the Committee, in the event of major events, whereby discussions on these issues are simultaneously accessible to all interested parties.

The conference call will be preceded by a current report, containing all relevant inside information, if applicable.

The Company will announce the conference call or web conference by issuing a press release that will present the nature of the information to be discussed at the conference, the date and time of the event and will provide information on how interested parties can access the conference. In addition, the company can send invitations to analysts, institutional investors, the media and others.

A recording of the conference call and/or web conference may be made available following the event for a period of time deemed appropriate.



Investor conferences and presentations

When possible, Cris-Tim will publicly announce in advance, investor conferences, presentations and related supporting materials will be available on Cris-Tim's website. Cris-Tim will encourage the organizers to provide webcasting connectivity for official presentations.

5.3 Analysis reports and models

No person referred to in this Policy may comment on analyst reports, financial models and assumptions. However, Cris-Tim's spokespeople can correct inaccurate information and discuss economic and industrial trends, which are generally known, that can affect the company.

Analysts' reports are the property of the analysis firm, and Cris-Tim should not be regarded as endorsing such reports by redistributing or making them available to the public or employees. Cris-Tim may, however, distribute analysts' reports to the Board of Directors, CEOs, credit bureaus and certain employees or consultants to help them monitor communications about Cris-Tim.

5.4 Analyst requests for revenue, profits, and other estimates

Responses to analysts' questions about Cris-Tim's revenues, earnings and other estimates will be limited to the company's already publicly disclosed forecasts and estimates, as well as the limits and average estimates made by other analysts. Cris-Tim will not guide analysts in terms of estimated revenues.

If management determines that future results are expected to deviate significantly from any estimate previously issued by Cris-Tim (particularly if revenues are expected to be below the limit), the Committee will consider issuing a current report and/or holding a conference to explain the change.

6. Electronic communications

Website

The IR Service will monitor the Investors section of the Cris-Tim website, to ensure that all information in the section is accurate, complete, up-to-date and in compliance with all capital market laws and this Policy.

The communication of inside information only on the company's website does not constitute an adequate dissemination of it. Any communication of inside information on the website must be preceded by the issuance of a current report.

Social media pages

Only Cris-Tim's Communication department is authorized to post information on Cris-Tim's social media forums, such as Facebook, LinkedIn. All information posted on the company's social media forums will comply with the rules of this Policy, including regarding the use of anticipated information and the disclosure of inside information, if applicable.



7. Consequences of non-compliance with the policy

Failure to comply with this Policy may lead to serious consequences, which may include internal disciplinary measures, termination of employment contracts or termination of consultancy contracts without prior notice.

If it turns out that an administrator, executive director or employee has violated such laws or regulations, then Cris-Tim can notify the competent authorities, which could entail sanctions, fines or even prison sentences.

8. Policy Review

This Policy has been approved by the Board of Directors of Cris-Tim. The IR Service will review this policy at least every two years and any material changes will be subject to the approval of the Board of Directors.

9. Questions

Any questions regarding this policy can be directed to the IR Service at the email address investors@cris-tim.ro.

10. Glossary

BVB – Bucharest Stock Exchange

MAR – Regulation (EU) no. Regulation (EC) No 596/2014 of the European Parliament and of the Council on market abuse and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC.

This document has been drafted in English and Romanian. In case of discrepancies between the two versions, the Romanian version shall prevail.