

medartis

# Ad-hoc Announcement Policy

# AD HOC ANNOUNCEMENT POLICY

## 1. Purpose

This Ad Hoc Announcement Policy is designed to ensure that Medartis complies with the requirements set by SIX Swiss Exchange for the timely and transparent communication of price-sensitive information to the public. In addition to legal compliance, ad hoc disclosures are an important tool for maintaining market integrity, equal treatment of shareholders and investor confidence.

## 2. Responsibility

The responsibility for making ad hoc announcements lies with Medartis' Board of Directors. The Board of Directors may delegate the communication in connection with ad hoc announcements to the Executive Management Board, or a designated spokesperson authorized to communicate on behalf of Medartis.

## 3. Case by Case Assessment

When discussing or issuing decisions concerning important facts rising within the sphere of Medartis, the Board of Directors shall assess whether or not the disclosure of such fact is capable of (i) triggering a **significant change in the share price**, which is by definition considerably greater than the usual price fluctuation and (ii) affecting the **reasonable** market participant in his investment decision. Annual and interim reports are always to be published with an ad hoc announcement. In cases where the categorization of facts that may trigger a significant change in the share price is not clear and straightforward, the Board of Directors decides on a case-by-case basis when becoming aware of such facts and record this assessment and its decision in writing.

## 4. Timing

Ad hoc announcements should be made as soon as Medartis becomes aware of the main points of a price-sensitive fact. If possible, the announcement must be published **outside of critical trading hours**: before 7:30 am or after the close of trading at 5:40 pm. If, in **exceptional cases**, the announcement is made during critical trading hours, SIX must be informed at least 90 minutes before publication so that they can temporarily cease trading of the affected securities if the situation requires it. If an announcement cannot be made immediately, Medartis should provide an explanation for the delay

## 5. Postponement of Disclosure

Medartis may postpone the disclosure of a price-sensitive fact, if the fact is based on a plan or decision of Medartis and its dissemination might prejudice the legitimate interests of Medartis. In the event of a leak, the market must be informed about the fact immediately.

In order to ensure that the price-sensitive fact remains confidential for the entire time that disclosure

is postponed, the following rules must be followed:

- Price-sensitive facts should only be disclosed on a strict need-to-know basis to employees and/or external consultants and only to the extent necessary for them to perform their duties (the «need-to-know» principle).
- External consultants which are not bound by a statutory secrecy obligation must sign a confidentiality agreement before any information is disclosed.
- The General Counsel shall keep a list of persons having access to the price-sensitive fact.
- Corporate Communications shall prepare a leak statement / press release and keeps it up to date so that it can be published at any time in the event of an information leak.

## 6. Content

Ad hoc announcements must always begin with a classification as “Ad hoc announcement pursuant to Art. 53 LR” and should contain the following information:

- A clear and concise description of the material information to ensure that the reasonable market participant can form an opinion of the extent to which the content is price-sensitive.
- The information contained in an ad hoc announcement must be factual, clear and complete.
- Ad hoc announcement shall not be mixed with pure marketing announcements and may only contain additional information with a factual connection that is necessary or helpful for the market participant to analyze and comprehend the price-sensitive fact. Financial announcements such as the annual results that are «per se» price-sensitive may contain all information that is also included in the report, whether or not this particular information is in fact price-sensitive.
- Two or more price-sensitive facts can be announced in one ad hoc announcement.
- Repetition of price-sensitive facts that have already been disseminated in an earlier ad hoc announcement is only permitted if necessary or helpful for the context of a new price-sensitive fact.
- Contact details for media and investor inquiries.

## 7. Distribution

Ad hoc announcements should be distributed to SIX Swiss Exchange via the online Connexor Reporting platform, as well as to at least two electronic information systems, at least two Swiss media (printed or electronic) of national importance. The announcement must also appear on the listed company's website (pull system) for a period of three years and must be sent to interested market participants by email (push system).

## 8. Review and Update

This policy shall be reviewed regularly to ensure it remains compliant with SIX Swiss Exchange requirements and reflects Medartis' commitment to transparent and timely communication.

## 9. Training

Medartis shall provide appropriate training to employees responsible for making ad hoc announcements to ensure they understand the policy, are familiar with the Connexor platform and know their responsibilities.

## 10. Contact Person

For any questions or concerns regarding this Ad Hoc Announcement Policy, please contact the Medartis Investor Relations Department at [investor.relations@medartis.com](mailto:investor.relations@medartis.com).

## 11. Approval

This policy was approved by Medartis' Board of Directors on [Date].