

Investor relations policy

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Part 1: Purpose and goals.....	2
Part 2: General principles	2
Part 3: IR activities	2
Part 4: Shareholder meetings and AGMs	3
Part 5: Silent period	3
Part 6: Approval and updates	3

Part 1: Purpose and goals

Spar Nord Bank's (the Bank) investor relations policy has been prepared in accordance with the Bank's vision and strategy and applicable legislation with pertaining guidelines and executive orders, including in accordance with the Danish recommendations on corporate governance.

1.1 Purpose

The purpose of Spar Nord's investor relations activities is to enable market participants to obtain the best possible overview of Spar Nord as a company and as an investment opportunity. The overarching principles for the activities are laid down in this policy.

1.2 Goals

Spar Nord has an ambition of providing relevant and readily understandable information to both existing and prospective investors. Accordingly, Spar Nord aims to provide open and adequate information on a timely basis to shareholders, analysts or other stakeholders.

To achieve this, it is a key prerequisite to ensure that Spar Nord consistently complies with applicable legislation and the disclosure requirements applying to companies listed on Nasdaq Copenhagen.

Part 2: General principles

The Bank's Executive Board and Head of Investor Relations are authorised to act as Spar Nord spokespersons in general communications with capital market participants. Spar Nord's information is communicated through 1) announcements and 2) meetings with stakeholders.

Announcements are either scheduled, such as annual or quarterly reports, recurring announcements such as information about insider trading or ad hoc announcements about matters such as organisational changes. Spar Nord publishes all information which according to applicable legislation is considered relevant to the price of the Bank's shares. All announcements are published in both Danish and English.

All information which is considered price-sensitive will be published through company announcements before the information is provided to other groups. Announcements are published through service providers and will as soon as possible thereafter be available at www.sparnord.com.

Part 3: IR activities

As part of the IR activities, the Executive Board and the Head of Investor Relations meet regularly with external stakeholders. This includes meetings with individuals, group presentations and presentations at conferences. In connection with the release of quarterly and annual reports, Spar Nord arranges roadshow events with presentations of its financial performance.

Roadshows and other meetings with professional investors are often arranged by Danish and international investment banks, which are appointed by Spar Nord with due consideration to

both their analyst coverage of Spar Nord and relevant peers and access to existing and prospective investors with a view to ensuring high-quality meetings.

Spar Nord pursues the principle that when the Executive Board and the Head of Investor Relations participate in roadshows and conferences, the organiser should seek to schedule three or four meetings per day.

Part 4: Shareholder meetings and AGMs

As a supplement to communications with professional stakeholders, Spar Nord each year hosts about 30 shareholder meetings, at which the Bank's management team engages with a large proportion of the Bank's private shareholders.

All shareholders are entitled to attend general meetings.

Part 5: Silent period

For a period of two weeks prior to the planned release of quarterly reports and three weeks before the release of annual reports (known as the "silent" or "quiet" period), Spar Nord will not comment on or discuss matters related to financial performance or expectations.

Part 6: Approval and updates

6.1 Approval

The Executive Board recommends the investor relations policy for approval by the Board of Directors of the Bank. The Finance Department holds the operational responsibility for ensuring a review of the Bank's investor relations policy.

6.2. Updates

The investor relations policy must be reviewed annually. Changes to the policy must be presented for approval to the Board of Directors, which also approves the overall investor relations policy on an annual basis.

This investor relations policy was approved by the Board of Directors and will take effect on 9 February 2022.