

## ALLFUNDS GROUP PLC

### Communications Policy

#### 1. Introduction

Allfunds Group PLC (the **Company**) is committed to meeting its obligations under the Market Abuse Regulation ((EU) No 596/2014) (**MAR**) to disclose inside information to the market. This policy has been endorsed by the board of directors of the Company (the **Board**). The Board is responsible for the overall policy for control and dissemination of price-sensitive information. It has established a Market Disclosure Committee to oversee the Company's disclosure of information and has established terms of reference for such committee.

#### 2. Continuous Disclosure Policy

1. The Company should notify and announce any inside information that directly concerns it as soon as possible, unless it is entitled to delay disclosure under MAR. It does this by making a press announcement and by providing the announcement to the AFM. In certain circumstances the Company may make a holding announcement where it cannot make a full announcement (e.g. because there has been an unexpected and significant event or where a transaction is being negotiated and there has been a leak of confidential information).
2. To the extent that the Company delays the disclosure of inside information, the Company, through the Market Disclosure Committee or otherwise, will need to maintain an internal record of certain matters in relation to the delay, including: (i) the date and time of existence of the inside information, the decision to delay disclosure and when the Company is likely to make disclosure; (ii) the identity of the persons who made the decision to delay disclosure, determined the conditions to the delay of disclosure and whom are responsible for providing the written explanation to the competent authority; and (iii) evidence that the conditions to the delay of disclosure have been met and evidence of any change in the conditions.

#### 3. Internal procedures

The Market Disclosure Committee is responsible for deciding whether information is inside information, what information should be disclosed and when. The Company has adopted procedures for dealing with inside information which include informing employees with access to inside information of their obligations and responsibilities as a result of such access. The Company has also adopted procedures to ensure that any person with access to inside information acknowledges in writing the legal and regulatory duties entailed and is aware of the sanctions applicable to insider dealing and unlawful disclosure of inside information. These policies are intended to establish a robust anti-leaking culture within the group.

#### **4. Announcements**

The Company discloses information via press releases, with simultaneous filing with the AFM, which filings with the AFM are made via the appropriate mechanism on the AFM's website (<https://www.loket.afm.nl>).

#### **5. Regular Disclosure and contacts with the market**

1. The Company makes regular disclosures to the market of its financial and operational results. The Company's financial calendar is available on its website.
2. The Company's senior management conducts results briefings, one-to-one briefings, meetings and educational sessions and provides background and technical information to institutional investors and stockbroking analysts.
3. The Company's policy is to disclose inside information generally to the market. Authorised employees may clarify information that the Company has released generally but do not comment on inside information that has not been disclosed to the market generally. Other employees who receive a request for comment or information in relation to any matter concerning the Company are not authorised to provide information on the Company's behalf and must refer the enquiry to an authorised employee.
4. The Company's policy is not to comment on or respond to market speculation, rumours or leaks. Where a leak of inside information appears to have occurred, the Company will consider whether to hold an enquiry into the leak.
5. The Company does not discuss its financial or operating performance: (i) between 31 December and the announcement of the full year results; (ii) between 30 June and the announcement of the half-yearly results, or (iii) to the extent that the Company has elected to, and is continuing to, provide quarterly updates to the market, between 31 March or 30 September, as appropriate, and the announcement of the quarterly update, unless it has made an announcement in the relevant period.
6. The Company does not comment on analysts' earnings estimates.
7. The Company holds open briefings with investors, analysts, market participants and financial journalists and one-on-one briefings to provide background and technical information to assist the market's understanding of the group's business activities. The Company's policy is not to disclose any inside information that has not been disclosed to the market generally. If a question cannot be answered without disclosing inside information that has not yet been disclosed, the Company will decline to answer the question or wait until the information has been announced before responding.
8. As far as practicable, more than one Company representative will be present at any briefing and will keep a record. If an employee considers that a matter has been disclosed that may be inside information, they should inform the [General Counsel and the Company's investor relations director], who may refer it to the Market Disclosure Committee].
9. For open briefings, the Company will place the presentation materials on the website.

10. The Company is not responsible for analysts' reports that comment on the Company and does not endorse such reports. The Company is not required to comment on draft reports or to correct incorrect information or assumptions. The Company does not comment on any profit forecasts contained in such reports.

**6. MISCELLANEOUS**

1. For any further information or questions with respect to this Policy, please contact the Company's investor relations director via [investors@allfunds.com](mailto:investors@allfunds.com).
2. A copy of this Policy is published on the Company's website [www.allfunds.com](http://www.allfunds.com). This Policy may be amended by a resolution of the Board. Any amendments will be published on the Company's website.
3. This Policy enters into effect on April 23, 2021.