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AS DELFINGROUP MARKET ABUSE PREVENTION POLICY NO. 12PL13-0

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1. AGREED TERMS

**DelfinGroup  
Inside information**

AS DelfinGroup and its subsidiaries  
Information of a precise nature, that has not been made public, relating directly or indirectly to one or more issuers or one or more financial instruments which, if it were made public, would be likely to have a significant effect on the prices of those instruments or on the price of related derivative financial instruments ([Appendix No 1](#))

**Market manipulation  
Regulation**

(For the definition and events of market manipulation, see Annex No. 8)  
Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) 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.

**Insider List**

A list of persons, who have access to Inside information and who work for DelfinGroup under an employment contract or other conditions, performing tasks for which they have access to inside information, such as consultants, accountants or credit rating agencies. This list should be regularly updated and made available to the Financial and Capital Market Commission upon request as soon as possible.

**Competent authority**

Financial Capital and Market Commission within the meaning of the Market Abuse Regulation.

**Persons having access to Inside information, i.e. (Insiders)**

Any person, who is in possession of Inside information for the following reasons:

- (a) the person is a member of the administrative, management or supervisory body of the issuer;
- (b) the person has a share in the issuer's capital;
- (c) the person has access to the information while performing work, professional or official duties; or
- (d) the person is involved in criminal activities.

It may also be any person, who has inside information at his or her disposal due to circumstances other than those mentioned above, if that person knows or ought to know that it is inside information.

**Closely associated person**

- (a) the spouse or a partner equivalent to the spouse in accordance with the laws of Latvia;
- (b) a dependent child in accordance with the laws of Latvia;
- (c) a relative, who has had a joint household for at least one year at the time of the relevant transaction;
- (d) any legal person, trust or partnership, the management of which is performed by a person, who is recognised by the issuer as having a management responsibility within the meaning of the Regulation;
- (e) any legal person, trust or partnership which is subordinated, directly or indirectly, to a person recognised by the issuer as having management responsibilities within the meaning of the Regulation, or established for the benefit of such a person, or whose economic interests are substantially equivalent to the interests of such a person;
- (f) a legal person, trust or partnership, the management of which is performed by a closely associated person to a person who is recognised by the issuer as having management responsibilities within the meaning of the Regulation;
- (g) a legal person, trust or partnership which is directly or indirectly subordinate to a person closely associated with a person, who is recognised by the issuer as having management responsibilities within the meaning of the Regulation, or for the benefit of such a person, or whose economic interests are largely equivalent to the interests of that person.

**Person discharging managerial responsibilities**

A person employed by DelfinGroup, who is:

- (a) a member of the administrative, management or supervisory body; or
- (b) a senior executive, who is not a member of the bodies referred to in point (a) and who has regular access to Inside information directly or indirectly related to that entity and who has the power to make management decisions affecting the future development and business prospects of that entity;

**Policy Issuer**

This Market Abuse Prevention Policy  
For the purpose of this Policy, AS DelfinGroup

<b>Nasdaq Riga</b>	AS “Nasdaq Riga”, registration number 40003167049, Latvian Regulated Exchange, which is licensed and supervised by the Financial and Capital Market Commission.
<b>Management board</b>	The Management board of AS DelfinGroup

## 2. PURPOSE AND SCOPE OF THE POLICY

- 1.1 The purpose of the policy is to prevent the unlawful disclosure and/or use of inside information for transactions with DelfinGroup securities and/or market manipulation, as well as to define the duties and responsibilities of the persons involved;
- 1.2 For the purpose of this policy, transactions with DelfinGroup securities are to be understood as any transactions with shares and any other financial instruments, including debt instruments, financial derivatives and any other related financial instruments, as well as the granting and using stock options.
- 1.3 The policy is binding to all employees of DelfinGroup and its subsidiaries, as well as third parties, who have permanent or temporary access to the Inside Information.

## 3. GENERAL PROVISIONS

- 3.1 In addition to the Policy, the legislation in force in the territory of the Republic of Latvia, regulations and decisions of the Competent Authority, as well as binding regulations of Nasdaq Riga are binding to Persons having access to Inside information, Closely associated persons and Persons discharging managerial responsibilities.
- 3.2 DelfinGroup informs Persons having access to Inside information on their inclusion, removal or change of status in relation to the Insider list and the obligations and/or restrictions applicable thereto ([Appendix No 2](#)).
- 3.3 If DelfinGroup has not informed the persons having access to Inside information on his/her status, obligations and/or restrictions with regard to Inside information, DelfinGroup employees must in any case assess the nature of information in their possession or whether it is considered Inside information and therefore the employee should be considered as the Person having access to inside information.
- 3.4 In case of doubt as to whether an employee is in possession of Inside information, the person may contact the direct manager, or an employee authorised by the Management board.
- 3.5 Non-compliance with the Policy or intentional violation may lead to disciplinary sanctions or termination of employment, as well as to prosecution in accordance with the procedures provided for in the legislation of the Republic of Latvia.

## 4. OBLIGATIONS OF PERSONS HAVING ACCESS TO INSIDE INFORMATION

- 4.1 Persons having access to Inside information, Closely associated persons and Persons discharging managerial responsibilities may not engage in or attempt to engage in Insider trading including:
  - 4.1.1 use the information on its own behalf or on behalf of a third party, directly or indirectly acquiring or disposing of financial instruments to which the information relates;
  - 4.1.2 use the information to cancel or change an order in relation to the financial instrument, to which the information relates, if the order was given before the Inside information was available to the relevant person;
  - 4.1.3 to recommend another person to acquire or dispose of financial instruments to which the said information relates, or to encourage such person to make such acquisition or disposal;
  - 4.1.4 recommend another person to cancel or change an order regarding a financial instrument, to which that information relates, or encourage that person to make such a cancellation or change.
- 4.2 Persons having access to Inside information, Closely associated persons and Persons discharging managerial responsibilities may also not unlawfully disclose Inside information to any other person, except when the disclosure is made performing ordinary business, professional or official duties.

- 4.3 Persons having access to Inside information, Closely associated persons, Persons discharging managerial responsibilities or any other person are prohibited from engaging in Market Manipulations ([Appendix No 8](#)).
- 4.4 In case of any uncertainty regarding the employee's duties as a Person having access to Inside information, the employee should consult his or her direct manager or an employee authorised by the Management board.

## 5. RESPONSIBILITIES OF DELFINGROUP AS AN ISSUER

- 5.1 DelfinGroup informs the public as soon as possible about Inside information related to the company.
- 5.2 DelfinGroup ensures that Inside information is disclosed in a manner that provides the public with prompt access to this information and possibility of its complete, correct and timely evaluation by publishing such information on Nasdaq Riga system.
- 5.3 DelfinGroup does not combine the disclosure of Inside information to the public with regular information about its operations.
- 5.4 DelfinGroup publishes and maintains (<https://www.delfingroup.lv/>) all Inside information that DG must disclose to the public on its website for at least five (5) years.
- 5.5 DelfinGroup may postpone the disclosure of Inside information to the public, provided that the following conditions are met:
  - 5.5.1 immediate disclosure could endanger the legitimate interests of DelfinGroup;
  - 5.5.2 postponing the disclosure of information would not mislead the public;
  - 5.5.3 DelfinGroup may ensure the confidentiality of this information.
- 5.6 If DelfinGroup is involved in a long-term process that takes place or is planned to be implemented in several stages, or that results in a specific circumstance or event, DelfinGroup may postpone the disclosure of Inside information related to this process, subject to the provisions of Article 5.5 of the Policy.
- 5.7 If DelfinGroup has postponed the disclosure of Inside information in accordance with Article 5.5 or 5.6 of the Policy, it shall, as soon as the information is disclosed to the public, inform the Competent Authority that the disclosure has been postponed and provide a written explanation of compliance with Article 5.5 of the Policy.
- 5.8 If DelfinGroup has postponed the disclosure of Inside information in accordance with Article 5.5 or 5.6 of the Policy and the confidentiality of such Inside information is no longer ensured, DelfinGroup shall disclose such Inside information to the public as soon as possible. This includes situations, where rumours clearly relate to Inside information that has been postponed in accordance with Article 5.5 or 5.6 of the Policy, if those rumours indicate with sufficient precision that the confidentiality of the relevant information is no longer guaranteed.
- 5.9 If DelfinGroup or a person acting on its behalf or on its assignment intentionally discloses any Inside information to a third party in the course of its work, professional or official duties, DelfinGroup shall concurrently disclose such information in full and in substance to the public. If unplanned disclosure of information to a third party has occurred, DelfinGroup shall immediately and in full disclose such information to the public. This requirement shall not apply where the person receiving the information is bound by an obligation of confidentiality, whether imposed by law, regulation, articles of association or agreement.
- 5.10 It is the responsibility of DelfinGroup to prepare a list of persons ([Appendix No 3](#)), who are in possession of Inside information and who work under an employment contract or other conditions, performing tasks for which they have access to Inside information, such as consultants, accountants or credit rating agencies. This list must be regularly updated and made available to the Competent Authority upon request.
- 5.11 DelfinGroup takes all necessary measures to ensure that the persons included in the Insider list confirm their obligations under the law in writing and are aware of the sanctions applied for Insider trading and illegal disclosure of Inside information.

## 6. CREATION AND MAINTENANCE OF INSIDER LIST

- 6.1 Members of the Management Board are responsible for identifying and determining the Persons having access to the Inside information either permanently or within the framework of individual projects, transactions and events.
- 6.2 Management Board decides whether to include such persons in the Insider list(s).
- 6.3 Management Board approves the Insider list(s), and any changes thereto.
- 6.4 An employee authorised by the Management board shall maintain the Insider list and update information in accordance with the decisions of the Management board.  
DelfinGroup may have one or more Insider lists. The number of lists and the information to be included shall be decided by the Management board.
- 6.5 The Insider list shall indicate at least:
- 6.5.1 the identity of all persons having access to the Inside information;
  - 6.5.2 the reason for including the person in the Insider list;
  - 6.5.3 the date and time when the said person obtained access to the Inside information; and
  - 6.5.4 the date on which the Insider list was of drawn-up.
- 6.6 The Insider list may also include legal entities (auditors, consultants, accountants). DelfinGroup separately agrees with the respective legal entity about the inclusion of legal entities or their employees in the Insider list ([Appendix No 7](#)).
- 6.7 DelfinGroup updates the Insider list immediately, indicating the date of the update, in the following cases:
- 6.7.1 change of reason for which the relevant person is included in the Insider list;
  - 6.7.2 a new person having access to the Inside information must be included in the Insider list; and
  - 6.7.3 a person no longer has access to the Inside information.
- 6.8 Insider list is updated promptly and each update to the Insider list shall specify the date and time of the change that triggered the update.
- 6.9 DelfinGroup shall retain the Insider list for at least 5 years after it is drawn up or update. No person/entry may be deleted, when updating the Insider list.
- 6.10 DelfinGroup submits the Insider lists to the Competent Authority upon request and in accordance with the decision of the Management Board.

## 7. PERSONS DISCHARGING MANAGERIAL RESPONSIBILITIES

- 7.1 DelfinGroup shall notify the Persons discharging managerial responsibilities of their obligations in writing in accordance with the fifth paragraph of Article 19 of the Regulation. DelfinGroup prepares a list of all Persons discharging managerial responsibilities and Persons closely associated with them ([Appendix No 4](#)).
- 7.2 Persons discharging managerial responsibilities shall notify Closely associated persons in writing of their obligations under Article 19 of the Regulation and shall keep a signed copy of this notification ([Appendix No 5](#)).
- 7.3 Persons discharging managerial responsibilities, as well as Closely associated persons, shall notify DelfinGroup and the Competent Authority ([fktk@fktk.lv](mailto:fktk@fktk.lv)) of each transaction they have performed on their behalf that relates to DelfinGroup shares or any other financial instruments as soon as the amount of such transactions reaches EUR 5,000 ([Appendix No 6](#)) during one calendar year.
- 7.4 Such notices must be provided immediately and no later than 3 (three) business days after the date of the transaction.
- 7.5 The Person discharging managerial responsibilities shall not carry out transactions on its own behalf or on behalf of a third party, directly or indirectly in relation to DelfinGroup shares or debt instruments, derivatives or other related financial instruments during the closed 30 calendar day period prior to the preparation of interim financial report or annual report that DelfinGroup is obliged to publish in accordance with:
- 7.5.1 the rules of the trading venue where trading of the Issuer's shares is permitted; or
  - 7.5.2 the national law.

7.6 DelfinGroup may allow a Person discharging managerial responsibilities to trade on its own behalf or on behalf of a third party during the closed period of 30 calendar days referred to in Article 7.5 of the Policy, if:

- 7.6.1 there is a set of exceptional circumstances, such as serious financial difficulties, which require the immediate sale of shares (on a case-by-case basis); or
- 7.6.2 due to the characteristics of the relevant trade, transactions carried out in relation to an employee share or savings scheme, the qualification entitlement of shares, or transactions where the beneficial interest in the relevant security does not change.

## 8. CONTROL OF INSIDE INFORMATION

- 8.1 DelfinGroup restricts the access of employees and other persons to Inside information and only allows access to such information on a need-to-know basis.
- 8.2 DelfinGroup ensures that employees and other persons having access to Inside information, are informed and aware of the disciplinary and legal consequences related to the disclosure and misuse of Inside information in securities trading.
- 8.3 As soon as an employee or a person is included in the Insider list of I, DelfinGroup will inform such person by sending him/her a Notice of inclusion in the Insider list ([Appendix No 2](#)).
- 8.4 The Employee is obliged to sign and submit the said Notice to DelfinGroup within 7 (seven) days.
- 8.5 If an employee no longer has access to the Inside information or he/she is removed from the Insider list, DelfinGroup will inform the employee in writing indicating, the fact of removal from the Insider list and the date on which it was done.

## 9. FINAL PROVISIONS

- 9.1 An approved copy Market Abuse Prevention Policy is published on the DelfinGroup corporate website and on the company's intranet.
- 9.2 The Policy takes effect upon its approval by the Supervisory board of DelfinGroup.
- 9.3 Management board members and department heads are responsible for informing subordinates about approval of the Policy and key conditions.
- 9.4 The Policy is updated every 2 years or as needed.

## 10. RELATED DOCUMENTS AND APPENDICES

10.1 Related documents:

- Regulation (EU) No. 596/2014 of the European Parliament and of the Council and related legislation
- Financial Instrument Market Law of the Republic of Latvia
- FCMC recommendations No. 161 of 1 October 2019
- Rules of AS "Nasdaq Riga" for issuers

10.2 Attachments:

- Appendix No 1 EXAMPLES AND EVENTS OF INSIDE INFORMATION
- Appendix No 2 NOTIFICATION OF THE STATUS AND RESPONSIBILITIES OF THE PERSON HAVING ACCESS TO INSIDE INFORMATION
- Appendix No 3 INSIDER LIST
- Appendix No 4 LIST OF PERSONS DISCHARGING MANAGERIAL RESPONSIBILITIES AND PERSONS CLOSELY ASSOCIATED
- Appendix No 5 NOTIFICATION OF A PERSON WITH MANAGERIAL RESPONSIBILITIES TO THE PERSON CLOSELY ASSOCIATED

- Appendix No 6 NOTIFICATION ABOUT TRANSACTIONS WITH FINANCIAL INSTRUMENTS OF PERSONS DISCHARGING MANAGERIAL RESPONSIBILITIES AND PERSONS CLOSELY ASSOCIATED
- Appendix No 7 NOTIFICATION TO THE THIRD PARTY REGARDING THE OBLIGATIONS IN RELATION TO INSIDE INFORMATION
- Appendix No 8 LIST OF ACTIONS COMPRISING MARKET MANIPULATIONS

**Information on the revision of the document**

Date of revision	Version No	Changes
2021.10.27	0	New document

**APPENDIX NO 1****EXAMPLES AND EVENTS OF INSIDE INFORMATION.**

Below are listed events, that can be considered as Inside information. The list is not absolute and the fact that an event is not included in this list does not automatically mean that the information in question is not Inside information and vice versa. Any decisions of DelfinGroup in relation to these events are also to be considered Inside information.

Examples of events:

1. Financial results of the Issuer's operations or their forecasts;
2. Rapid changes in operational performance indicators;
3. Significant changes in the issuer's shareholding, including agreements between shareholders that are known to the issuer or about which the shareholders have informed the Issuer;
4. Changes in the composition of the issuer's Management board, Supervisory board or audit committee or change of the sworn auditor;
5. Change of the Issuer's company (name), legal address or actual location;
6. Activities related to the issue of equity or debt securities;
7. Increase or decrease of the share capital;
8. Changes in the characteristics of financial instruments traded on the Issuer's trading venues (change in nominal value, changes in rights, etc.);
9. Reorganisation;
10. Termination or liquidation of business;
11. Change in the scope of business;
12. Acquisition of new product or service markets or loss of existing ones;
13. Registration of significant new patents, as well as decrease or increase in the value of existing patents or cancellation of the issuer's patent;
14. Significant transactions with the Issuer's assets (significant investments, transactions with the Issuer's fixed assets, or financial assets owned by the Issuer);
15. Significant decrease or increase in the value of the Issuer's real estate;
16. Significant increase or decrease in the value of financial instruments in the Issuer's portfolio or assets;
17. Acquisition or termination of a substantial holding in other companies;
18. Granting, receiving, cancelling or annulment of significant loans;
19. Significant orders received from customers, their termination or other changes that may affect the Issuer's business;
20. Dividend *ex date*, calculation date, payment date, dividend amount, adoption of a new dividend policy or changes therein;
21. Significant fluctuations in the prices of goods, raw materials or services important to the Issuer, which may affect the business of the Issuer;
22. Conclusion of agreements important to the Issuer, amendments to their essential terms and conditions, termination or cancellation of agreements, fundamental breaches of concluded agreements due to the fault of the Issuer or in relation to the issuer;
23. Information regarding the decision of a state institution that may have a significant impact on the Issuer's financial position and its right to perform certain types of commercial activities;
24. Information on new legislation or changes in it (tax changes, industry regulations, etc.) that may significantly affect the Issuer's financial position or business;



25. Issuer's decision on buy-back programmes;
26. The Issuer's decision to include financial instruments included in the regulated market in another regulated market or to exclude them from another regulated market;
27. The Issuer's decision to choose another Member State as its home Member State;
28. Ratings assigned by the credit rating agency to the Issuer or its financial instruments;
29. Legal proceedings instituted by the Issuer or against the Issuer, as well as a court decision, if such proceedings or decision may have a significant effect on the Issuer's business or financial position;
30. Initiation, declaration or termination of legal and out-of-court legal supervision proceedings (or intention to file such an application) or insolvency proceedings against the Issuer, its parent company, a group consolidated company or a significant debtor.

## **APPENDIX NO 2**

### **NOTIFICATION OF THE STATUS AND RESPONSIBILITIES OF PERSON HAVING ACCESS TO INSIDE INFORMATION**

Date:

#### *About responsibilities and restrictions of a Person having access to Inside information*

AS DelfinGroup has issued dematerialised bearer shares of **AS Nasdaq Riga**, which are included on the Baltic Main List and bonds, which are registered in **Nasdaq CSD SE (depository)**. As an employee of AS DelfinGroup, who has access to Inside information, you have certain obligations and restrictions arising from European Parliament Council Regulation (EU) No. 596/2014 (Regulation) and AS Nasdaq Riga and FCMC regulations and decisions regarding confidentiality and misuse of information.

We therefore invite you to read, sign and submit this notice to AS DelfinGroup within 7 days of receipt.

#### **Inside information.**

For the definition of Inside information and events, please see Annex No. 1 to the Policy

Inside information that is not disclosed to the public is considered confidential and may not be disclosed to any person outside AS DelfinGroup.

#### **Your commitment.**

Considering your job responsibilities/position, you have access to Inside information. This means, that:

- Your name will be included in the Insider list;
- You must confirm that you are aware of the obligations and restrictions that apply to Inside information and that you are aware of the consequences that may result from the misuse or neglect of Inside information;
- It is your responsibility to maintain the confidentiality of the Inside information known to you, in particular:
  - only allow access to Inside information to internal or external persons when necessary. If necessary, you should consult with your direct manager;
  - immediately inform the direct manager if you have disclosed the Inside information to an internal or external person, who is not on the Insider list;
  - sign and submit this statement to DelfinGroup.

#### **Disclosure of information**

Inside information that is directly relevant to AS DelfinGroup or its securities must only be disclosed through official disclosure channels.

#### **Trading of AS DelfinGroup securities**

In accordance with the Regulation and other legal acts, you have limited opportunities to trade the securities of AS DelfinGroup, as you are an Inside information holder. The purpose of these restrictions is to ensure that the company's employees do not misuse the information in their possession.

#### **Consequences of non-compliance or breach of restrictions/obligations**

The employees of AS DelfinGroup are responsible for the observance of the obligations and restrictions of the Inside information holder. Intentional or unintentional non-compliance or violation of these restrictions may result in disciplinary action (including termination of employment) and, as the case may be, administrative or criminal penalties.

The following, inter alia, shall be considered a breach of the restrictions:

- Trading or attempted trading of AS DelfinGroup securities based on Inside information;
- Disclosure of Inside information to any other person, unless required by direct job duties or job description;
- Distribution of information or behaviour that gives or could give a false or misleading impression about the price, value supply and demand of AS DelfinGroup securities;
- Any behaviour that could distort the market regarding AS DelfinGroup securities.

Trading or inciting trading with AS DelfinGroup securities, based on any undisclosed Inside information, is a criminal offence.

Please sign this statement and submit it to AS DelfinGroup.

Sincerely,

(name, surname and position of the sender)

---

I have read this document and I am aware of the legal and other obligations and consequences arising from access to Inside information. I am aware of the confidentiality obligation towards AS DelfinGroup.

---

Name, Surname

Date:

**APPENDIX NO 3**  
**INSIDER LIST**

Date and place of creation:

Renewal date:

Submitted to the Supervisory body: \_\_/\_\_/\_\_

Name	Surname	Maiden name	Work phone No. (including mobile phone)	Name of the Company, address	Responsibilities and grounds for inclusion	Date and place of inclusion	Date of birth:	ID No./Personal identity number	Private phone number	Usual Address

**APPENDIX NO 4**

**LIST OF PERSONS DISCHARGING MANAGERIAL RESPONSIBILITIES AND CLOSELY ASSOCIATED PERSONS**

Name	Surname	Birth Surname	Position, function	Name of the Company and Address	Work phone/mobile	Personal identity number/ID No.	Private phone No.	Full residential address	Name of the closely associated person	Surname of the closely associated person	Relationship	Pers. Code/ ID number/registration No.	Date of birth, yyyy/mm/dd	Full address

**APPENDIX NO 5****NOTIFICATION OF A PERSON DISCHARGING MANAGERIAL RESPONSIBILITIES TO A CLOSELY ASSOCIATED PERSON**

In accordance with the provisions of Market Abuse Regulation (Regulation (EU) No. 596/2014 of the Council of the European Parliament on the use of Inside information for securities trading, I inform that:

1. I, (Name/surname) / position / am a Person discharging managerial responsibilities in AS DelfinGroup and/or its subsidiary and, in accordance with Regulation of the European Parliament and of the Council No. 596/2014 (Regulation) and the regulations of AS Nasdaq Riga and the FCMC, I must comply with certain requirements regarding trading in securities of AS "DelfinGroup" or its subsidiary;
2. You are a Closely associated person within the meaning of the Market Abuse Regulation.

IN LIGHT WITH THE TERMS OF THE REGULATION, PLEASE KEEP IN MIND THAT IN THE EVENT OF ANY TRADING IN SECURITIES OF AS DELFINGROUP, YOU MUST INFORM AS DELFINGROUP and FCMC (fktk@fktk.lv) ABOUT IT IMMEDIATELY OR NOT MORE THAN 3 (three) DAYS AFTER THE TRANSACTION.

Please sign the copy of this statement.

Signature \_\_\_\_\_

Date \_\_\_\_\_

I have read the content of this statement and am aware of the legal obligations and responsibilities arising from my status as a Closely associated person.

---

Name/surname/signature

Date

**APPENDIX NO 6**

**NOTIFICATION ABOUT TRANSACTIONS WITH FINANCIAL INSTRUMENTS OF PERSONS DISCHARGING MANAGERIAL RESPONSIBILITIES AND CLOSELY ASSOCIATED PERSONS.**

<b>1</b>	<b>Information about a person with managerial responsibilities/and persons closely related to them</b>	
a)	Name, surname/name	
<b>2</b>	<b>Reason for notification</b>	
a)	Position/status	<input type="checkbox"/> The statement concerns a person closely related to the person with managerial responsibilities: (specify) -- ____  <input type="checkbox"/> Person with managerial responsibilities (specify) _____
b)	Initial notification/amendment	
<b>3</b>	<b>Information about the issuer, emission allowance market participant, auction platform, etc.</b>	
a)	Name, surname/name	AS DelfinGroup
b)	LEI	
<b>4</b>	<b>Details of the transaction (s): a separate section for (i) each type of instrument; (ii) each type of transaction; (iii) each date; (iv) each transaction venue.</b>	
a)	Description/type of financial instrument	
	Identification code	ISIN....
b)	Description of the transaction	Purchase of shares
c)	Price(s) and volume(s)	Price(s)
		Euro
d)	Aggregated information	
	Total volume	
	Price	
e)	Date of Transaction	
f)	Place of Transaction	AS Nasdaq Riga, XRIS

Signature \_\_\_\_\_

Date: \_\_\_\_\_

**APPENDIX NO 7**

**NOTIFICATION (sample) TO THE LEGAL ENTITY ABOUT THE OBLIGATIONS**

Dear \_\_\_\_\_

In accordance with the requirements of EU Regulation 596/2014 (Market Abuse Regulation) and the Market Abuse Prevention Policy of AS DelfinGroup, we invite you to read the information and agree to the following conditions:

- You acknowledge that any information you may obtain in relation to AS DelfinGroup or its securities is Inside information within the meaning of the Regulation and the Policy.
- You confirm that your company has procedures in place to ensure that employees of your company, who may have access to Inside information in relation to AS DelfinGroup, are aware of their obligations under the Regulation and the Policy, in particular with respect to the disclosure of Inside information or using it when trading in securities.
- You agree to maintain (and update as necessary) an Insider list in accordance with the requirements of the Regulation regarding employees who have access to information identified by AS DelfinGroup as Inside information.
- You agree to submit AS DelfinGroup the lists of these persons (subject to data protection requirements) and to submit complete lists of these persons to the Competent Authorities upon their request.
- You agree to keep lists of such persons until AS DelfinGroup informs you that the relevant information is no longer considered Inside information.



**APPENDIX NO 8****MARKET MANIPULATION AND RELATED ACTIVITIES*****Market manipulations include the following actions:***

1. engaging in a transaction, placing a trading order or any other act that: (i) gives or is likely to give false or misleading indications regarding the offer, demand or price of a financial instrument; or (ii) provides or may provide an inappropriate or artificial level of price for one or more financial instruments, unless the person engaging in the transaction, placing a trading order or engaging in any other activity proves that such transaction, order or other act has been carried out for legitimate reasons and is in accordance with accepted market practices as determined in accordance with Article 13 of the Market Abuse Regulation;
2. engaging in a transaction, placing a trading order or any other act or conduct which affects or is likely to affect the price of one or more financial instruments through fictitious mechanisms or other forms of fraud or deception;
3. disseminating information and rumours through the media, including the Internet or any other means, which gives or may give false or misleading indications as to the supply, demand or price of a financial instrument, or provides or may provide an inappropriate price for one or more financial instruments at an artificial level, if the person who disseminated the information knew or reasonably ought to have known that the information was incorrect or misleading;
4. the transmission of incorrect or misleading information or the provision of incorrect or misleading data in relation to a criterion where the person who transmitted the information or provided the data knew or reasonably ought to have known that it was incorrect or misleading, or any other act affecting the calculation of benchmarks.

***The following conduct shall be considered Market manipulation:***

- (a) securing a dominant position on the part of a person or group of persons in relation to the supply of or demand for a financial instrument, which has or may have a direct or indirect effect on the provision of a purchase or sale price, or which creates or may create other unfair trading conditions;
- (b) buying or selling of financial instruments at market opening or closing prices, which have or may have a misleading effect on investors, who act on the basis of quoted prices, including opening and closing prices;
- (c) placing orders on the trading venue, including the cancellation or modification of those orders, by any available means of trading, including electronic means, such as algorithmic and high-intensity computerised trading strategies, which have any of the effects listed in points (a) or (b) above, to: (i) interfere with or impede or be likely to interfere with or impede the operation of the trading venue's trading system; (ii) make it difficult or likely to make it difficult for others to identify orders in the trading venue's trading system, including by overloading or destabilising the order book by registering orders; or (iii) creates or is likely to create false or misleading indications as to the supply of, demand for, or price of a financial instrument, in particular by recording orders to initiate or exacerbate a trend in price changes;
- (d) the use of the advantages of occasional or regular access to traditional or electronic means of information, expressing opinion about a financial instrument (or indirectly about its issuer) after the positions of those financial instruments have been open, as well as profit from changes in the price of that instrument after the expression of the relevant opinion on the price of the relevant instrument, at the same time not disclosing the relevant conflict of interests appropriately and effectively;