

# OUTLET » GROUP

## INSTRUCTIONS FOR HANDLING OF INSIDE INFORMATION

ADOPTED BY THE BOARD OF DIRECTORS OF OUTLET GROUP HOLDING ASA ON 13 AUGUST 2026

*These Instructions for Handling of Inside Information with appendices are adopted to secure, together with any other corporate governance documents, that Outlet Group Holding ASA (the "**Company**") complies with the continuing obligations for companies with financial instruments listed at the Oslo Stock Exchange and other applicable rules, regulations and recommendations relating to inside information.*

*The instructions included herein are subject to annual review by the board of directors of the Company.*

*These instructions are solely for the internal use of the Company, and none other than the Company can invoke breach of the content.*

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## INSTRUCTIONS FOR HANDLING OF INSIDE INFORMATION

### 1 BACKGROUND AND PURPOSE

The purpose of these Instructions is to ensure the Company fulfils its statutory duties and responsibilities, and to increase individuals' awareness of the responsibility the possession of Inside Information entails and the potential consequences of using and/or disclosing such information.

### 2 APPLICABILITY, RESPONSIBILITY, ETC.

The Instructions apply to all employees, officers and board members of the Company.

The executive management of the Company shall ensure that the relevant employees and officers of the Company receive necessary information about and training in the use of the Instructions. The Company's responsibility lies with the person that the Company will designate (the "**Designated Person**") , who shall assist in providing necessary and practical training in the handling of Inside Information to the relevant employees.

Each employee, officer and board member of the Company must read these Instructions in its entirety to understand their duties and obligations.

It is the responsibility of the respective employee, officer and board member to ensure that he or she complies with these Instructions. Any violation of these Instructions or queries with regards to the following provisions, and duties and obligations arising out of them, should be directed to the Designated Person.

When an inquiry is received regarding information that may be material, it should be referred, without comment, to the Company's contact for investor relations.

### 3 DEFINITIONS

"**Altinn**" means the Norwegian communication portal for individuals and legal entities to communicate with Norwegian authorities, available at <https://info.altinn.no/en>.

"**COMPANY**" means Outlet Group Holding ASA.

"**Close Associate**" means:

- a) the Primary Insider's spouse or partner considered to be equivalent to a spouse in accordance with the law in the jurisdiction of the Primary Insider;
- b) the Primary insider's dependent children pursuant to the law in the jurisdiction of the Primary Insider;
- c) a relative who has shared the same household as the Primary Insider for at least one year on the date of the Transaction concerned; and
- d) a legal person, trust or partnership, the managerial responsibilities of which are discharged by a Primary Insider or by a person referred to in the points above, which is directly or indirectly controlled by such a person, which is set up for the benefit of such a person, or the economic interests of which are substantially equivalent to those of such a person. The reference to "the managerial responsibilities of which are discharged" should be read to cover those cases where a Primary Insider or a Close Associate takes part in or influences the decisions of another legal entity to carry out transactions in Financial Instruments issued by the Company.

**"Financial Instruments"** means the listed shares issued by the Company, as well as other financial instruments which value either depends on or has an effect on such shares.

**"Inside Information"** means inside information as defined in article 7 of MAR and as further described in section 4 of these Instructions.

**"InsiderLog"** means the insider tool for, inter alia, maintaining insider lists, provided as a service by the Oslo Stock Exchange and subscribed to by the Company.

**"Instructions"** means these Instructions for Handling of Inside Information.

**"MAR"** means regulation (EU) No. 596/2014 on market abuse (market abuse regulation), as implemented in Norway in accordance with section 3-1 of the Securities Trading Act as of 1 March 2021 (as amended from time to time).

**"NewsPoint"** means Oslo Stock Exchange's information system, accessible by the designated administrator in the Company.

**"Norwegian FSA"** means the Financial Supervisory Authority of Norway.

**"Primary Insider"** means:

- a) a member of the administrative, management or supervisory body of the Company; or
- b) a senior executive who is not a member of the bodies referred to above, who has (i) regular access to Inside Information relating directly or indirectly to the Company and (ii) power to take managerial decisions affecting the future developments and business prospects of the Company.

**"Securities Trading Act"** means the Norwegian Securities Trading Act of 29 June 2007 no. 75 (as amended from time to time).

**"Transaction"** means any transaction, including but not limited to, the transactions listed in [Appendix 4](#) hereto (including selling, acquiring, subscribing to, exchanging or swapping, granting or receiving gifts or inheritance, pledging and lending) directly or indirectly on one's own account or on another person's account, in any of the Financial Instruments, or inducement to such transactions.

## **4 EXPLANATION OF THE TERM "INSIDE INFORMATION"**

### **4.1 General**

The term Inside Information means any information of a **"precise nature"** relating directly or indirectly to financial instruments or the issuer thereof which **"has not been made public"**, and which is likely to have a **"significant effect"** on the price of those financial instruments.

### **4.2 Information of a "precise nature"**

The requirement that the information must be of a "precise nature" relates to the specificity of the information and the existence of, or likelihood of future, price sensitive events and/or circumstances. Only events or circumstances that exist or reasonably may be expected to come into existence will be considered "precise". In addition, the information must be specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices of the financial instruments or the related derivative

financial instrument, meaning that the information must be more than rumours, assumptions and speculations. In this respect in the case of a protracted process that is intended to bring about, or that results in, particular circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information. Even an intermediate step in a protracted process shall be deemed to be Inside Information if, by itself, it satisfies the criteria set out in this section 4.

#### **4.3 "Significant effect" on the price**

The requirement that the information must have a "significant effect", means that the information is likely to be used by a reasonable investor as part of his/hers investment decisions. It is not a requirement that the information enables the price to be "moved" above or below a certain specific threshold, meaning that most expected changes in the price could be sufficient to fulfil this requirement.

#### **4.4 Information that "has not been made public"**

Only information that "has not been made public" will be deemed to constitute inside information. Inside information relating to the Company must in principle be disclosed to the market pursuant to the Company's ongoing reporting obligations. If inside information becomes publicly available through other means, it will no longer constitute Inside Information (but the incident could represent a violation of the Company's disclosure obligations). Press releases on NewsWeb are regarded as public information. Information about undisclosed financial results or a possible merger, acquisition or other material development, whether concerning the Company or otherwise, and obtained in the normal course of employment or through a rumour, tip or just "loose talk", is not public information.

#### **4.5 Events that may typically be considered Inside Information**

It is not possible to define all categories of information that could be considered as Inside Information. Inside Information may be positive or negative. While it may be difficult to determine whether particular information is Inside Information, there are various categories of information that are particularly sensitive and, as a general rule, should always be handled with due care as it is reasonable that it will constitute Inside Information. Examples of such information include:

- a) financial results;
- b) new equity or debt offerings;
- c) entry into a material agreement or discussions regarding entry into a material agreement;
- d) projections of future earnings or losses;
- e) a proposed merger or acquisition;
- f) sale or acquisition of material assets;
- g) gain or loss of a substantial customer; and
- h) project announcements of a significant nature.

Each employee and member of the board of directors has a duty to continually assess whether information that he/she receives or gains access to by virtue of his/her position or office in the Company may be considered to be, or is likely to become, Inside Information. Any person who gains knowledge of such information shall immediately notify the Designated Person. If the employee or elected officer is in doubt as to whether or not the relevant information qualifies as Inside Information, he/she shall regardless of his/her doubts immediately contact the Designated Person.

## **5 THE DUTIES AND OBLIGATIONS OF THE COMPANY**

### **5.1 Public disclosure of Inside Information**

As a general rule, the Company shall publicly disclose Inside Information regarding the Company's Financial Instruments through NewsPoint as soon as possible.

The disclosure of Inside Information shall clearly identify (i) that the information communicated is inside information, (ii) the full legal name of the Company, (iii) the name, surname and position within the Company of the person making the notification and (iv) the subject matter of the inside information.

The Company shall not combine the disclosure of inside information to the public with the marketing of its activities.

Once made public, all Inside Information must be available on the Company's website for at least five years from the same time as disclosure of Inside Information. The posts on the website shall clearly indicate date and time of disclosure and that the information is organised in chronological order.

### **5.2 Delayed public disclosure of Inside Information**

The Company may delay the publication of Inside Information if the following conditions are met:

- a) immediate disclosure is likely to prejudice the legitimate interests of the Company;
- b) delay of disclosure is not likely to mislead the public;
- c) the Company is able to ensure the confidentiality of that information.

If delayed disclosure of Inside Information is resolved:

- a) the Company shall keep a list of persons with access to the Inside Information in InsiderLog;
- b) the Designated Person shall make a written record of the delayed disclosure by making a written record in InsiderLog when establishing an insider list as required by paragraph a) above; and
- c) where the confidentiality of the Inside Information is no longer ensured, the Company shall disclose that Inside Information to the public as soon as possible, including situations where a rumour explicitly relates to Inside Information, where that rumour is sufficiently accurate to indicate that the confidentiality of that information is no longer ensured.

Where the Company has delayed the disclosure of Inside Information, it shall immediately after the information is disclosed to the public:

- a) inform the Norwegian FSA that disclosure of the information was delayed by sending a notification through Altinn, using Altinn form KRT-1801: *Notification to Finanstilsynet by issuers who have delayed disclosure of inside information* - available here: <https://www.finanstilsynet.no/rapportering/fellesrapporteringer/mar-melding-krt-1801-og-redegjorelse-om-utsatt-offentliggjoring-av-innsideinformasjon> / (Norwegian) <https://www.finanstilsynet.no/en/reporting/all/mar-notification-krt-1801-and-written-explanation-on-delayed-disclosure-of-insideinformation> / (English); and
- b) upon request by the Norwegian FSA and/or the Oslo Stock Exchange, provide a written explanation of assessments made related to the Inside Information and of how the conditions for delayed disclosure were met.

### **5.3 Insider lists**

As soon as a decision has been made to delay public disclosure, the Designated Person shall establish and maintain an insider list of every person who has access to the relevant Inside Information and who are working for the Company under a contract of employment, or otherwise performing tasks through which they have access to Inside Information, such as advisers, accountants or credit rating agencies.

The insider list shall be established and maintained through InsiderLog.

A new insider list should be established and maintained upon the identification of new Inside Information. Each insider list shall only include details of individuals having access to the Inside Information relevant to that insider list.

The list must be kept and stored confidentially in InsiderLog by ensuring that access to the insider list is restricted to clearly identified persons from within the Company.

An automatic message from InsiderLog shall be sent to the persons on the list informing them that they have been included on the list of insiders, as well as the duties and responsibilities that this entails, and the criminal liability that applies for any use of such information. Each person on the insider list receiving such automatic message shall acknowledge receipt of the automatic message.

A new automatic message from InsiderLog shall be sent to the persons on the list informing them once the insider list is terminated.

The insider list shall be deposited in InsiderLog after the last time it is updated and be retained for five years from the date it was last updated.

The list shall be submitted to the Norwegian FSA and/or the Oslo Stock Exchange upon request.

The Designated Person can delegate the responsibility of maintaining the list to the advisor as far as the advisor's own handling of Inside Information is concerned. In such a situation, one contact person with the advisor shall be listed on the Company's own insider list.

### **5.4 Project list**

If deemed appropriate, the Designated Person shall establish and maintain a project list for each project which is of such a scope or of such a nature that it involves information which is particularly sensitive and important for the Company and which may subsequently become Inside Information. The purpose of the project list is to raise awareness of the duty of confidentiality. The list shall be maintained as a "sensitivity list" in InsiderLog.

### **5.5 Disclosure of notifiable Transactions by Primary Insiders and Close Associates**

Upon receipt of notifications of Transactions from the Primary Insider or Close Associate as further described in section 7.3 below, the Designated Person shall immediately after receiving information about the Transaction disclose the Transaction in question through NewsPoint in the format attached hereto as Appendix 1. Most of the information required to complete the form attached hereto as Appendix 1 will be included in the receipt which the Primary Insider and Close Associate, as applicable, can request when submitting the form to the Norwegian FSA as further described below.

## **5.6 Other disclosure obligations**

The Company is, regardless of whether the information in question constitute Inside Information or not, required to immediately disclose the events required to be disclosed pursuant to the membership rules of the Oslo Stock Exchange, including but not limited to the events listed below, noting that if such events must be assumed to constitute inside information, the Company may delay disclosure in accordance with section 5.2 above:

1. Any changes in the rights attaching to the Company's listed shares, including any changes in related financial instruments issued by the Company.
2. The issue of new bonds, including any guarantees or collateral provided in that connection. If the issue is in respect of a convertible or subordinated loan, this must be stated. Any issue of similar convertible rights must also be made public.
3. Proposals and decisions by the board of directors, general meeting or other corporate body on:
  - a) dividends;
  - b) mergers;
  - c) demergers;
  - d) increases or decreases in share capital;
  - e) mandates to increase the Company's share capital; and
  - f) share splits or reverse splits
4. Information on allocation and payment of dividends, as well on issuance of shares, including information on any arrangements for allotment, subscription, cancellation and conversion.
5. Proposals and decisions on the issue of subscription rights.
6. In the event of the issue of a loan or an increase in share capital as mentioned in items 2 and 3, information shall be given in particular on any underwriting consortium, including the members of the consortium and their guarantee obligations, as well as information on any advance subscription or allotment.
7. Registered change of the Company's name.
8. Registered change in the nominal value of the the Company's listed shares.
9. Decisions on changes to the the Company's board of directors, chief executive officer, financial director or external auditor, including notice of resignation given by any such person.

## **5.7 Financial reporting**

With regard to non-consolidated financial results at business area level, an assessment must be made of whether the results can be regarded as Inside Information in each individual case, in the same way as for other sensitive information.

The conditions for delayed public disclosure must be assessed on a case by case basis. If delayed disclosure of Inside Information is resolved, the Company is required to comply with all the requirements set out in section 5.2 above.

The Company's financial department shall continually assess whether the financial results for a given period reveal substantial variances (significantly worse or better) from expectations created by the Company, i.e. expectations that can be traced back to information provided by the Company itself. This assessment must be carried out in consultation with the Designated Person. If appropriate, the Designated Person shall decide whether a profit warning should be published.

## **5.8 List of Primary Insiders and their Close Associates**

The Designated Person shall maintain an up-to-date list of Primary Insiders and their Close Associates, regardless of whether the person in question owns Financial Instruments, and submit such register to the Oslo Stock Exchange through NewsPoint. Each Primary Insider is responsible for informing the Designated Person of any changes to its Close Associates. The Oslo Stock Exchange will disclose the list of Primary Insiders, while the list of Close Associates will be kept confidential.

## **5.9 Notification of obligations to Primary Insiders**

The Company shall notify the Primary Insiders of their obligations as Primary Insiders pursuant to these Instructions and Article 19 of MAR in writing in the format attached hereto as Appendix 2.

# **6 THE DUTIES AND RESPONSIBILITIES OF ALL INDIVIDUALS**

## **6.1 Introduction**

Each person who receives Inside Information regarding the Company's Financial Instruments shall act in accordance with the prohibitions and duties that are described in further detail below.

This section is not necessarily a complete list of duties and responsibilities. Each person being in possession of Inside Information is obliged to keep him- or herself updated as to the legislative framework concerning Inside Information from time to time.

## **6.2 Prohibition of use of Inside Information**

No person shall conduct any Transactions in Financial Instruments if he/she has Inside Information regarding Financial Instruments. This prohibition applies to every natural and legal person, indirect and direct trading, and trading both for own account and for a third party's account, irrespective of form of settlement. The prohibition also applies to attempts and incitement to trade, i.e. persons who have Inside Information regarding Financial Instruments are not permitted to give other persons advice or in any way influence other persons to carry out or refrain from carrying out Transactions in Financial Instruments.

The above applies correspondingly to the entry into, purchase, sale or exchange of options or forward/futures contracts or similar rights (including financial derivatives) related to such Financial Instruments or incitement to carry out such Transactions.

The prohibition only applies to Transactions that can be characterized as use of Inside Information. Whether or not the Transaction constitutes use must be assessed in each individual case.

The use of Inside Information by cancelling or amending an order concerning a Financial Instrument to which the information relates where the order was placed before the person concerned possessed the Inside Information, is also considered as unlawful use of inside information.

## **6.3 Duty of confidentiality**

Inside Information is confidential information, and shall not be given to or in other ways made available to any unauthorized persons. Any person who has Inside Information has a duty, when handling such information, to exercise due care in order to ensure that Inside Information does not come into the possession of unauthorized persons by, inter alia:

- a) Use password protection on electronic devices that contain Inside Information.

- b) Do not store Inside Information locally in PC hard disks.
- c) Make sure you have solutions in place for remote disabling of phones/tablets that are synced with your email, in case of loss/theft.
- d) Always log off devices with access to Inside Information before leaving them.
- e) Be careful when distributing Inside Information. Do not distribute Inside Information directly by email, but put the information in a password protected document.
- f) Do not print documents through printers in common areas without picking up the print immediately.
- g) Documents that are put away to be destroyed or shredded must be put in a secure box, not through regular recycling.
- h) Be careful when mentioning anything related to Inside Information. Do not discuss Inside Information in front of others, either by phone or through regular conversations.
- i) Make sure to never leave documents with Inside Information at your desk, in meeting rooms or common areas.
- j) If you get access to or find documents that might be Inside Information, make sure to inform the Designated Person and destroy the documents immediately.

The information may only be communicated or made available to another person where the disclosure is made in the normal exercise of the employment, profession or duties of the person disclosing the information.

Any person who communicates Inside Information, or makes such information available to another person, has an independent responsibility for ensuring that the person who is given access to the relevant Inside Information is simultaneously made aware of the duties and responsibilities entailed by the receipt of such information, including the duty of confidentiality, the duty of proper handling of the information and the duty not to use it. The above applies regardless of whether the recipient is an employee, elected officer, an external advisor and/or a business connection of the Company.

If Inside Information is communicated or made available to another person, the person responsible for maintaining the insider list and/or the Designated Person shall be notified immediately, and if possible, before the information is communicated. The person responsible for maintaining the insider list shall immediately include the person in question on the relevant insider list if the person is working for the Company under a contract of employment, or otherwise performing tasks through which he or she has access to the Inside Information.

#### **6.4 Liability, etc.**

Illegal use of Inside Information is a criminal offence pursuant to the Securities Trading Act and may result in fines and up to six years imprisonment. Unlawful disclosure of Inside Information may be punished by fines and up to four years imprisonment. In addition, non-compliance with Norwegian law or any of the prohibitions and obligation set out in these Instructions may result in liability for damages to the Company and/or other parties pursuant to Norwegian law, as well as dismissal from the position he/she has in the Company.

## **7 ADDITIONAL OBLIGATIONS FOR PRIMARY INSIDERS AND THEIR CLOSE ASSOCIATES**

### **7.1 Applicability**

Primary Insiders and their Close Associates are subject to special duties and responsibilities which are described in this Section.

## **7.2 Obligation to clear Transactions**

Before carrying out, or inciting other persons to carry out or to refrain from carrying out, one or more Transactions, Primary Insiders must obtain clearance in writing from the Designated Person. Such request for clearance shall be submitted, and be responded to, by e-mail. The Designated Person can only provide clearance after first having performed a proper investigation of whether there is any Inside Information in the Company.

If the Designated Person finds that there exists Inside Information, the request for clearance may be denied, and always, without providing any explanation. In considering a request for clearance, the question of whether Inside Information is or will in fact be known to the person requesting clearance may be disregarded, and the existence thereof shall constitute sufficient basis to reject a request.

The request for clearance must be responded to in writing (by e-mail) by the Designated Person within seven days from the time of receiving a request for clearance. If a binding agreement is not concluded seven days after receiving clearance, a new clearance is required.

## **7.3 Duty of notification**

The Primary Insider or his/her Close Associates shall promptly after the Transaction notify both the Company in the format attached hereto as Appendix 1 and the Norwegian FSA via the link made available on <https://www.finanstilsynet.no/rapportering/fellesrapporteringer/mar-meldeplikt-for-handler-av-personer-med-ledelsesansvar-primarinnsidere-og-deres-narstaende/> of every Transaction conducted on its own account relating to the Financial Instruments of the Company once a threshold of EUR 5,000 has been reached (see below).

Upon receipt of the notification from the Primary Insider or Close Associate, the Designated Person shall immediately after receiving information about the Transaction disclose the Transaction in question through NewsPoint in the format attached hereto as Appendix 1 and as further described in section 5.5. above. Most of the information required to complete the form attached hereto as Appendix 1 will be included in the receipt which the Primary Insider and Close Associate, as applicable, can request when submitting the form to the Norwegian FSA.

The notification requirement applies to any subsequent Transaction once a total amount of EUR 5,000 has been reached within a calendar year. The threshold shall be calculated by adding without netting all Transactions of the person obligated to notify the Transaction. When calculating whether the threshold has been reached, the Transactions carried out by a Primary insider and by Close Associates to that Primary Insider should not be aggregated.

If Transactions are carried out in a currency which is not the EUR, the exchange rate to be used to determine if the threshold is reached is the daily euro foreign exchange reference rate published by the European Central Bank. For the purpose of the price to consider for donations, gifts and inheritance, one should use the last published price for the Financial Instrument concerned on the date of acceptance of the donation, gift or inheritance (i.e. the date of the Transaction), or where such price is not available that day, the last published price. As to the rules to calculate the price of options granted for free to managers or employees, the options should be based on the economic value assigned to the options by the issuer when granting them. However, the price field for options granted for free to managers or employees is expected to be nil.

#### **7.4 Closed periods**

A Primary Insider shall not do Transactions on its own account or for the account of a third party, directly or indirectly, in the Financial Instruments of the Company during a closed period of 30 calendar days before the announcement of an interim financial report or a year-end report which the issuer makes public. If the preliminary fourth quarter report contain all the key information relating to the financial figures expected to be included in the year-end report, no closed period should apply in advance to the publication of the final year-end report. In the event the information announced in such way changes after its publication, this will not trigger another closed period but should be addressed as potential Inside Information required to be disclosed pursuant to sections 5.1 and 5.2 above.

The Designated Person may permit a Primary Insider to conduct any Transactions in a closed period on a case-by-case basis due to, inter alia, the existence of exceptional circumstances, such as severe financial difficulty, which require the immediate sale of shares or due to the characteristics of the Transaction made always subject to the criteria set out in article 19 of MAR and Commission Delegated Regulation (EU) 2016/522 supplementing MAR.

#### **7.5 Notification of obligations**

Primary Insiders shall notify its Close Associates of their obligations as Close Associates pursuant to these Instructions and Article 19 of MAR in writing in the format attached hereto as Appendix 3 and shall keep a copy of such notification.

#### **7.6 General exercise of due care**

Primary Insiders and their Close Associates shall refrain from short-term Transactions in Financial Instruments or other instruments linked to shares in the Company, and should generally exercise due care in the period of ownership.

## APPENDIX 1 - NOTIFICATION OF TRANSACTIONS BY PRIMARY INSIDERS AND CLOSE ASSOCIATES

| <b>1</b> | <b>Details of the person discharging managerial responsibilities/person closely associated</b>                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |          |           |  |  |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------|--|--|
| a)       | Name                                                                                                                                                                                                     | <i>[For natural persons: the first name and the last name(s).]<br/>[For legal persons: full name.]</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |          |           |  |  |
| <b>2</b> | <b>Reason for the notification</b>                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |          |           |  |  |
| a)       | Position/status                                                                                                                                                                                          | <i>[For Primary Insider: the position occupied within the Company should be indicated, e.g. CEO, CFO.]<br/>[For Close Associates: An indication that the notification concerns a person closely associated with a Primary Insider and the Name and position of the relevant Primary Insider].</i>                                                                                                                                                                                                                                                                                                                                      |          |           |  |  |
| b)       | Initial notification/Amendment                                                                                                                                                                           | <i>[Indication that this is an initial notification or an amendment to prior notifications. In case of amendment, explain the error that this notification is amending.]</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |          |           |  |  |
| <b>3</b> | <b>Details of issuer</b>                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |          |           |  |  |
| a)       | Name                                                                                                                                                                                                     | Outlet Group Holding ASA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |          |           |  |  |
| b)       | LEI                                                                                                                                                                                                      | 636700ZGN52GCB14L216                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |          |           |  |  |
| <b>4</b> | <b>Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |          |           |  |  |
| a)       | Description of the financial instrument, type of instrument and identification code                                                                                                                      | <i>[Indication as to the nature of the instrument, e.g. a share, bond, derivative, including a reference to the ISIN.]</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |          |           |  |  |
| b)       | Nature of the transaction                                                                                                                                                                                | <i>[Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014. Indicate whether the transaction is linked to the exercise of a share option programme.]</i>                                                                                                                                                                                                                                                                                     |          |           |  |  |
| c)       | Price(s) and volume(s)                                                                                                                                                                                   | <table border="1"> <thead> <tr> <th>Price(s)</th><th>Volume(s)</th></tr> </thead> <tbody> <tr> <td> </td><td> </td></tr> </tbody> </table> <i>[Where more than one transaction of the same nature (purchases, sales, lendings, borrows) on the same financial instrument are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed.]</i>                                                                                                                                | Price(s) | Volume(s) |  |  |
| Price(s) | Volume(s)                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |          |           |  |  |
|          |                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |          |           |  |  |
| d)       | Aggregated information<br>— Aggregated volume<br>— Price                                                                                                                                                 | <i>[The volumes of multiple transactions are aggregated when these transactions</i><br><ul style="list-style-type: none"> <li>- relate to the same financial instrument;</li> <li>- are of the same nature;</li> <li>- are executed on the same day; and</li> <li>- are executed on the same place of transaction.]</li> </ul> <i>[Price information:</i><br><ul style="list-style-type: none"> <li>- In case of a single transaction, the price of the single transaction information;</li> <li>- In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregated transactions.]</li> </ul> |          |           |  |  |
| e)       | Date of the transaction                                                                                                                                                                                  | <i>[YYYY-MM-DD; UTC time.]</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |          |           |  |  |
| f)       | Place of the transaction                                                                                                                                                                                 | <i>[Name and code to identify the MiFID trading venue by referring to relevant MIC Code (<a href="https://www.iso20022.org/market-identifier-codes">https://www.iso20022.org/market-identifier-codes</a>), or if the transaction was not executed on any of the above mentioned venues, please mention 'outside a trading venue'.]</i>                                                                                                                                                                                                                                                                                                 |          |           |  |  |

## APPENDIX 2 – NOTIFICATION TO PRIMARY INSIDERS

### Notification to Primary Insiders

You are considered to be a person discharging managerial responsibilities (Nw. primærinsider) ("**Primary Insider**") as defined in article 3(25) of EU regulation 596/2014 on market abuse ("**MAR**") within Outlet Group Holding ASA (the "**Company**").

Pursuant to MAR, Primary Insiders and their Close Associates are subject to certain obligations and prohibitions. This is to notify you in writing of your obligations under article 19 of MAR as required by article 19(5) of MAR.

In addition to reading the obligations set out below, we strongly recommend that you familiarize yourself with the obligations imposed on Primary Insiders and Close Associates in article 19 of MAR as well as EU regulation 2016/522 and EU regulation 2016/523. Each of which may be accessed through

<https://www.finanstilsynet.no/regelverk/markedsatferd> / (Norwegian)

<https://www.finanstilsynet.no/en/laws-and-regulations/market-conduct> / (English).

We hereby notify you of your obligations set out in MAR article 19 and the Company's internal Instructions for Handling of Inside Information:

- You must obtain clearance in writing from the Company's Designated Person as set out in the Company's internal Instructions for Handling of Inside Information prior to entering into any transactions on your own account or for the account of a third party, directly or indirectly, relating to the financial instruments issued by the Company or to derivatives or other financial instruments linked to them.
- You must not conduct any transactions on your own account or for the account of a third party, directly or indirectly, relating to the instruments issued by the Company or to derivatives or other financial instruments linked to them during a closed period of 30 calendar days before the announcement of an interim financial report or a year-end report which the Company makes public, unless explicitly permitted to do so by the Designated Person of the Company.
- You must notify your Close Associates (as defined in MAR article 3(26)) (the "**Close Associates**") of their obligations under MAR article 19 in writing and you must keep a copy of the said notification. Close Associates include (a) spouses or partners considered to be equivalent to a spouse according to your national law, (b) dependent children according to your national law, (c) relatives who have shared the same household with you for at least one year on the date of the transaction concerned and any legal persons, trusts or partnerships, the managerial responsibilities of which are either discharged by you or by a person referred to in point (a), (b) or (c), directly or indirectly controlled by such a person, set up for the benefit of such a person, or the economic interests of which are substantially equivalent to those of such a person. The reference to "the managerial responsibilities of which are discharged" should be read to cover those cases where you or a person referred to in point (a), (b) or (c) takes part in or influences the decisions of the legal entity to carry out transactions in financial instruments of the Company. In the case of mere cross board membership, where you exercise executive or non-executive functions, without however taking part nor influencing the decisions of that legal entity to carry out transactions in financial instruments of the Company, then you should not be considered discharging managerial responsibilities within that legal entity.

- You must notify the Company and the Norwegian FSA of each transaction, including but not limited to, the transactions set out in Article 19 of MAR and Section 10 of regulation 2016/522 and in the list attached hereto (including, acquisition, disposal, short sale, subscription, exchange, acceptance or exercise of options, subscriptions gifts and donations made or received, and inheritance received), conducted on your own account relating to the instruments issued by the Company. The notification must be made promptly after the transaction. The obligation apply to any subsequent transaction once a total amount of EUR 5,000 has been reached within a calendar year. The notification to the Norwegian FSA must be provided through the link available through <https://www.finanstilsynet.no/rapportering/fellesrapporteringer/mar-meldeplikt-for-handler-av-personer-med-ledelsesansvar-primarinnsidere-og-deres-narstaende/>
- The notification to the Company must be provided by using the format attached hereto.
- When calculating whether the threshold has been reached, the transactions carried out by a primary insider and by Close Associates to that primary insider should not be aggregated. If transactions are carried out in a currency which is not EUR, the daily euro foreign exchange reference rate published by the European Central Bank on its website should be used. For the purpose of the price to consider for donations, gifts and inheritance, one should use the last published price for the financial instrument concerned on the date of acceptance of the donation, gift or inheritance (i.e. the date of the transaction), or where such price is not available that day, the last published price. As to the rules to calculate the price of options granted for free to managers or employees, the options should be based on the economic value assigned to the options by the Company when granting them.
- You must as soon as possible after receipt of this notification return the table below to the Company, duly completed with a list of your Close Associates (as defined above) and inform the Company immediately upon any subsequent change to your Close Associates. If you do not want to provide the details of your Close Associates per e-mail, please reach out to the Designated Person and provide the details by phone or in a secure manner.

Name of Primary Insider: .....

| Name and, if legal entity, type of entity | ID number/business reg. number | Address | E-mail | Relation to the Primary Insider |
|-------------------------------------------|--------------------------------|---------|--------|---------------------------------|
|                                           |                                |         |        |                                 |
|                                           |                                |         |        |                                 |
|                                           |                                |         |        |                                 |
|                                           |                                |         |        |                                 |
|                                           |                                |         |        |                                 |

Date: [Insert date]

On behalf of Outlet Group Holding ASA

## APPENDIX 3 – NOTIFICATION TO CLOSE ASSOCIATES

### Notification to Close Associates

You are considered to be a person closely associated ("**Close Associate**") (Nw. nærstående) of me as a person discharging managerial responsibilities ("**Primary Insider**") (Nw. primærinsider) within Outlet Group Holding ASA (the "**Company**") as defined in article 3(26) of the EU regulation 596/2014 on market abuse ("**MAR**").

Pursuant to MAR, Primary Insiders and their Close Associates are subject to certain obligations and prohibitions. This is to notify you in writing of your obligations pursuant to article 19 of MAR as required by article 19(5) of MAR. I will keep a copy of this notification.

In addition to reading the obligations set out below, we strongly recommend that you familiarize yourself with the obligations imposed on Primary Insiders and Close Associates in MAR article 19 as well as EU regulation 2016/522 and EU regulation 2016/523. Each of which may be accessed through

<https://www.finanstilsynet.no/regelverk/markedsatferd/> (Norwegian)

<https://www.finanstilsynet.no/en/laws-and-regulations/market-conduct/> (English).

I hereby notify you of your obligations set out in MAR article 19:

- You must notify the Company and the Norwegian FSA of each transaction, including but not limited to, the transactions set out in Article 19 of MAR and Section 10 of regulation 2016/522 and in the list attached hereto (including, acquisition, disposal, short sale, subscription, exchange, acceptance or exercise of a options, subscriptions gifts and donations made or received, and inheritance received), conducted on your own account relating to the instruments issued by the Company. The notification must be made promptly after the transaction. The obligation apply to any subsequent transaction once a total amount of EUR 5,000 has been reached within a calendar year. The notification to the Norwegian FSA must be provided through the link available through <https://www.finanstilsynet.no/rapportering/fellesrapporteringer/mar-meldeplikt-for-handler-av-personer-med-ledelsesansvar-primarinnsidere-og-deres-narstaende/>. The notification to the Company must be provided by using the format attached hereto.
- When calculating whether the threshold has been reached, the transactions carried out by a Primary Insider and by Close Associates to that primary insider should not be aggregated. If transactions are carried out in a currency which is not EUR, the daily euro foreign exchange reference rate published by the European Central Bank on its website should be used. For the purpose of the price to consider for donations, gifts and inheritance, one should use the last published price for the financial instrument concerned on the date of acceptance of the donation, gift or inheritance (i.e. the date of the transaction), or where such price is not available that day, the last published price. As to the rules to calculate the price of options granted for free to managers or employees, the options should be based on the economic value assigned to the options by the Company when granting them.

Date: [Insert date],

[Insert name of Primary Insider]

## **APPENDIX 4 – TRANSACTIONS TO BE NOTIFIED BY PRIMARY INSIDERS AND CLOSE ASSOCIATES**

Transactions conducted on their own account relating to the listed shares or debt instruments of the Company or to derivatives or other financial instruments linked thereto must be notified by Primary Insiders and Close Associates, including, but not limited to:

1. the pledging or lending of financial instruments by or on behalf of a Primary Insider or a Close Associate (but not if the pledge, or a similar security interest, is done in connection with the depositing of the financial instruments in a custody account, unless and until such time that such pledge or other security interest is designated to secure a specific credit facility);
2. transactions undertaken by persons professionally arranging or executing transactions or by another person on behalf of a Primary Insider or a Close Associate, including where discretion is exercised;
3. transactions made under a life insurance policy, defined in accordance with Directive 2009/138/EC of the European Parliament and of the Council (26), where
  - a) the policyholder is a Primary Insider or a Close Associate,
  - b) the investment risk is borne by the policyholder, and
  - c) the policyholder has the power or discretion to make investment decisions regarding specific instruments in that life insurance policy or to execute transactions regarding specific instruments for that life insurance policy.
4. acquisition, disposal, short sale, subscription or exchange;
5. acceptance or exercise of a stock option, including of a stock option granted to managers or employees as part of their remuneration package, and the disposal of shares stemming from the exercise of a stock option;
6. entering into or exercise of equity swaps;
7. transactions in or related to derivatives, including cash-settled transaction;
8. entering into a contract for difference on a financial instrument of the concerned issuer;
9. acquisition, disposal or exercise of rights, including put and call options, and warrants;
10. subscription to a capital increase or debt instrument issuance;
11. transactions in derivatives and financial instruments linked to a debt instrument of the concerned issuer, including credit default swaps;
12. conditional transactions upon the occurrence of the conditions and actual execution of the transactions;
13. automatic or non-automatic conversion of a financial instrument into another financial instrument, including the exchange of convertible bonds to shares;
14. gifts and donations made or received, and inheritance received;
15. transactions executed in index-related products, baskets and derivatives;
16. transactions executed in shares or units of investment funds, including alternative investment funds (AIFs);
17. transactions executed by manager of an AIF in which a Primary Insider or a Close Associate has invested;
18. transactions executed by a third party under an individual portfolio or asset management mandate on behalf or for the benefit of a Primary Insider or a Close Associate;
19. borrowing or lending of shares or debt instruments of the issuer or derivatives or other financial instruments linked thereto.

### **The notification obligation does not apply to:**

20. Transactions in financial instruments linked to shares or to debt instruments of the issuer referred to in that paragraph where at the time of the transaction any of the following conditions is met:

- a) the financial instrument is a unit or share in a collective investment undertaking in which the exposure to the issuer's shares or debt instruments does not exceed 20 % of the assets held by the collective investment undertaking;
- b) the financial instrument provides exposure to a portfolio of assets in which the exposure to the issuer's shares or debt instruments does not exceed 20 % of the portfolio's assets;
- c) the financial instrument is a unit or share in a collective investment undertaking or provides exposure to a portfolio of assets and the person discharging managerial responsibilities or a Close Associate does not know, and could not know, the investment composition or exposure of such collective investment undertaking or portfolio of assets in relation to the issuer's shares or debt instruments, and furthermore there is no reason for that person to believe that the issuer's shares or debt instruments exceed the thresholds in point a) or b).

If information regarding the investment composition of the collective investment undertaking or exposure to the portfolio of assets is available, then the Primary Insider or a Close Associate shall make all reasonable efforts to avail themselves of that information.

21. Finally, transactions executed in shares of an issuer or derivatives or other financial instruments linked thereto by managers of a collective investment undertaking in which the Primary Insider or Close Associate has invested do not need to be notified where the manager of the collective investment undertaking operates with full discretion, which excludes the manager receiving any instructions or suggestions on portfolio composition directly or indirectly from investors in that collective investment undertaking.

