

Disclosure policy of Nexstim Plc

Applicable rules

In its communications, Nexstim Plc ("Nexstim") complies with the Finnish and EU legislation, such as the EU Market Abuse Regulation ("MAR"), Nasdaq First North Nordic Growth Market Rulebook, the regulations and guidelines of the Finnish Financial Supervisory Authority ("FIN-FSA"). The disclosure policy is approved by the Board of Directors, reviewed periodically, and revised when necessary.

Disclosure principles

The CEO is responsible for Nexstim's disclosures.

Nexstim is committed to correct and timely disclosure, which is consistent, accurate and balanced, and gives a true and fair view of Nexstim's financial position and operations.

Nexstim regularly discloses financial information in its yearly financial statements, annual reports and half-yearly reports according to a preannounced schedule.

Nexstim discloses as soon as possible all information related to it or to its financial instruments that might have a significant effect on the prices of the said financial instruments, and thus is potentially price sensitive in nature. In accordance with the provisions of MAR, Nexstim can delay the public disclosure of inside information, provided that all the below conditions are met:

- (i) immediate disclosure is likely to prejudice the legitimate interest of Nexstim,
- (ii) delay of disclosure is not likely to mislead the public; and
- (iii) Nexstim is able to ensure the confidentiality of that information.

The decision to delay the disclosure of inside information is made and recorded by the Board of Directors, the CEO, or the CFO. In the event of delayed disclosure, Nexstim notifies the FIN-FSA of the delay immediately after the inside information has been published.

The management of Nexstim assesses independently whether information is significant to the price of the company's share. This assessment is based on the expected extent and importance of the decision, fact or circumstance on Nexstim's activities as a whole. Information will be considered to have a significant effect on the price of the share if a reasonable investor would be likely to use that information as part of the basis of his or her investment decisions.

Information pertaining to the following matters is always considered significant:

- material developments in clinical trials, including starting a new trial, material findings, reaching a milestone of a trial, ending a trial, and final results of a trial;
- material developments regarding authorisations, such as the granting or refusal of an authorisation or an authorisation being revoked;
- material events in relation to the commercialisation process of the company's products, such as gaining a reimbursement code for a treatment made with the company's device;
- material joint venture and commercialisation agreements;
- material acquisitions and financing transactions;
- significant co-operation agreements;
- share priced incentive programs;
- major restructuring.

Manner of disclosure

Nexstim publishes information as company announcements. Company announcements will be published simultaneously on the websites of Nasdaq First North Growth Market Helsinki and Nexstim. Any changes to published information will be published in the same manner as the original disclosure. All published information will be kept available for at least 5 years from the date of publication. Nexstim publishes information in Finnish and English.

Silent period

Nexstim adheres to a 21- calendar day silent period prior to the publication of its half-yearly reports and financial statement releases. During the silent period, Nexstim does not organise investor meetings or attend private meetings with the media, analysts or investors. However, even during the silent period, Nexstim discloses without delay information, that is subject to timely disclosure according to applicable regulation.

Managers' transactions

Members of the Board of Directors and the Management Team of Nexstim, as well as certain other persons defined by the CFO, and persons closely associated with them are obliged to notify Nexstim and the FIN-FSA of transactions conducted in Nexstim's financial instruments or any related instruments within three business days after the date of the transaction. Nexstim publishes the notifications it has received within the aforementioned three business day period.

In addition, the MAR and Nexstim's Insider Rules prohibit such persons under the notification obligation and persons closely associated to them, such as spouses and other persons living in the same household, from trading with Nexstim's financial instruments or any related instruments during a 30- calendar day closed window period prior to the publication of its half-yearly reports and financial statement releases, the day of the disclosure and one working day following such release.

Rumours

As a rule, Nexstim does not comment on market rumours, the price of its shares, actions of competitors or customers, analyst estimates, or confidential or unfinished business transactions unless Nexstim considers it necessary. However, if a rumor might have or has a significant effect on the prices of the financial instrument, Nexstim will respond timely and publish a company release to correct the market information. In case inside information has by accident been selectively disclosed, Nexstim discloses the proper and accurate information as soon as possible.

Board of Directors of Nexstim Plc

1 January 2024