

**TRADING WINDOW POLICY**  
**Supplement to the Rules for Primary Insiders**

(adopted by the Board of Directors in May 2021 and  
updated August 2022 and February 2024)

## 1. INTRODUCTION

### 1.1 Overview and Purpose of Trading Window Policy

This Trading Window Policy constitutes a supplement to the Rules for Primary Insiders. Words and phrases defined in the Rules for Primary Insiders shall have the same meaning in this Trading Window Policy unless differently defined or the context states otherwise.

The purpose of this Trading Window Policy is, in addition to the pre-approval procedures referenced in Section 6.2.3, Section 6.3.2 and Appendix 4 of the Rules for Primary Insiders, to enhance compliance with regulations applicable to Agilyx ASA (**Agilyx or Company**) and (to the extent applicable) Agilyx Group companies, including the Market Abuse Regulation, the Norwegian Securities Trading Act and the Euronext Growth Oslo Rulebook, by designating trading windows for Primary Insiders.

### 1.2 APPLICABILITY

This Trading Window Policy is applicable to:

- i. **Primary Insiders** (as defined in Section 3.3 of the Rules for Primary Insiders),
  - ii. their **PCAs** (as defined in Section 3.4 of the Rules for Primary Insiders),
  - iii. other employees and elected officers who are included on an Insider List in accordance with Section 5 of the Instructions for Handling Inside Information due to receipt or possession of, or access to, Inside Information (as defined in Section 3.1 of the Rules for Primary Insiders) or that the Company may designate from time to time as “Covered Person” because of their position or responsibilities,
- i – iii. collectively **Covered Persons**).

## 2. POLICY

### 2.1 TRADING RESTRICTIONS FOR COVERED PERSONS

Regardless of as to whether or not a Covered Person has access to or is in possession of any Inside Information, a Covered Person must not **trade** (as defined in Section 3.5 of the Rules for Primary Insiders) in the Company’s **Financial Instruments** (as defined in Section 3.2 of the Rules for Primary Insiders) outside a designated Trading Window or during a

period where the Trading Window is temporarily closed (please Section 2.3 third paragraph see below).

However, even during a designated Trading Window, a Covered Person who is in possession of any Inside Information should not trade in the Company's Financial Instruments until the relevant information has been made publicly available or is no longer material.

## **2.2 Pre-Clearance Requirement**

Any trades during a designated Trading Window require pre-approval in writing by the General Counsel as described in more detail in Section 6.2.3, Section 6.3.2 and Appendix 4 of the Rules for Primary Insiders.

## **2.3 Designated Trading Windows**

The Trading Window designates the permissible timeframes in which Covered Persons may trade in the Company's Financial Instruments following the publication of an Agilyx financial report. Generally, the Trading Window opens on the second (2<sup>nd</sup>) business day after the publication of the relevant financial report (whether half or full year) and remains open for twenty (20) days thereafter. On occasion, the General Counsel may set an earlier or later opening date for the Trading Window and/or extend the period during which the Trading Window is open.

As the Company only reports semi-annually and in order to not restrict Covered Persons unnecessarily, the General Counsel may, if circumstances allow, i.e. in the absence of (i) any **Closed Period** (as defined in Section 6.3.5 of the Rules for Primary Insiders) and (ii) any material Inside Information pending and not being publicly disclosed, use reasonable discretion to designate and open an additional Trading Window after the previous Trading Window has closed and before the start of the next following Closed Period.

The Company may close a Trading Window if there is or may be material Inside Information (such as negotiation of mergers, acquisitions or disposals, new business opportunities and alike) pending and not be publicly disclosed by imposing an internal blackout period during which Covered Persons are prohibited from trading in the Company's Financial Instruments. The Trading Window will re-open once this internal blackout period has ended.

## **2.4 Continued Trading Restrictions at End of Relationship with Company**

This Trading Window Policy continues to apply to trades in the Company's Financial Instruments even after a Covered Person has resigned, has been terminated or otherwise

served his/her relationship with the Company. Upon such departure, a departing or departed Covered Person who wants to trade in the Company's Financial Instruments must follow all guidelines and requirements in the Rules for Primary Insiders, the Instructions for Handling Inside Information and this Trading Window Policy up and until the earlier of (i) the opening of the next Trading Window, or (ii) when the Covered Person is not deemed anymore to be in possession of any relevant Inside Information, as confirmed in writing by the General Counsel.

### **3. QUESTIONS**

Questions regarding this Trading Window Policy and the Trading Window requirements and guidelines should be directed to the General Counsel (GC@agilyx.com)

\*\*\*\*\*