

QPR SOFTWARE PLC DISCLOSURE POLICY

1 Principles

This policy describes QPR Software Plc's (QPR) operating principles and procedures, which QPR uses for communicating with capital market representatives.

Shares of QPR are listed on Nasdaq Helsinki Ltd. QPR's information disclosure policy complies with European Union regulations, Finnish legislation, Nasdaq Helsinki Ltd's rules and insider guidelines, as well as the regulations issued by the Finnish Financial Supervisory Authority (FSA) and other relevant authorities, as applicable.

In external communications, QPR aims to disclose all relevant matters potentially impacting QPR's business operations in an accurate, adequate, and timely manner to all stakeholders simultaneously, equally, and without delay.

2 Stock Exchange Releases

QPR discloses inside information that may have a material impact on the value of the Company's shares to Nasdaq Helsinki, the Finnish Financial Supervisory Authority, and main media outlets.

As per the EU Market Abuse Regulation (MAR), QPR shall inform the public as soon as possible of relevant inside information, or delay such disclosure in accordance with said regulation, if the conditions for delay are met.

The following matters are disclosed in a stock exchange release:

- Quarterly financial results and business reports,
- Major changes in strategy,
- Material changes in the financial position of the Company and its future outlook,
- Material, binding new contracts (net sales 0.4 million euros or more – no time limit on revenue recognition),
- Major mergers or acquisitions, divestures, and other corporate arrangements,
- Changes in the composition of the Board of Directors, change of CEO or auditors,
- Crises having material impact on the financial results of the Company or its business operations,
- Transactions made with QPR securities by persons discharging managerial responsibilities at QPR or by persons closely

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- associated with them, or
- Other important and material issues with potential impact on business.

The Board of Directors approve financial statements, interim reports and any other stock exchange releases regarding the Company's financial results and forecasts. The Chief Executive Officer (CEO) approves all other stock exchange releases.

Comments and additional information regarding the Company, its operations and development are given by the CEO, unless otherwise stated in the release. In matters falling under the competence of the Board of Directors, comments and additional information are given by the Chairman of the Board of Directors, or the CEO when authorized by the Chairman.

3 Press Releases

Material issues related to QPR's business that do not meet the criteria of a stock exchange release but are still evaluated by the management to be newsworthy or otherwise of interest to the stakeholders, are disclosed as a press release. The aim of the Company is to disclose all matters material to the future development of its business.

As a rule, all new purchase orders with an estimated total net sales value of 0.1 – 0.4 million euros are disclosed as a press release without specifying the value of the contract. In addition, notable new customers may also be disclosed as a press release without specifying the value of the purchase order.

Some new purchase orders are not disclosed at all, or they are disclosed anonymously without any financial information when so requested by the customer, QPR reseller or business partner. When the net sales thresholds set in this disclosure policy are exceeded, only the CEO of the Company can make the non-disclosure decision.

The following matters, among others, may be disclosed as a press release:

- Successful customer cases or project delivery models,
- Product releases, new product versions or new technical milestones,
- New framework agreements,
- Co-operation agreements with customers, resellers or business partners,
- Major marketing activities,
- Other material issues impacting business.

All press releases must be approved by the CEO before publishing.

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4 Language and Channels

Stock exchange releases are published simultaneously in Finnish and English via the stock exchange, through main media outlets and on the company website. The QPR website also contains an archive for previously published stock exchange releases.

Press releases are made in Finnish – and depending on the situation – also in English or a third language. All press releases are published simultaneously on the company website, which also contains the archive of previously published press releases.

5 Disclosure or Postponement of Inside Information

In accordance with the Market Abuse Regulation (MAR), QPR will publish any inside information concerning the Company immediately. Inside information is published as a stock exchange release.

When assessing whether information is considered inside information, the Company considers the expected effects of the information compared to the Company's overall operations, as well as any other market factors that may affect the price of the Company's financial instrument in the given situation.

QPR may, at its own risk, delay disclosure of inside information to the public if all of the following conditions are met:

- immediate disclosure would be likely to jeopardize the legitimate interests of the Company;
- the postponement of disclosure is unlikely to mislead the public;
- the confidentiality of the information can be guaranteed.

The decision to postpone the disclosure of inside information is made by the CEO of the Company, or a person appointed by the CEO, based on a written assessment of the fulfilment of the conditions to delay inside information.

6 Silent Period

QPR observes a 30-day 'closed period' that ends the day after the publication of the interim report or financial statements. During the closed period, the management and other personnel do not discuss with the media or capital market representatives about the financial situation of the Company, its business development or outlook.

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7 Changes in Forecasts and Outlook

The Company publishes without any unnecessary delay both positive and negative profit warnings, if the Company management estimates that the financial position, results or outlook materially differ from information published earlier, and if the difference may have a material impact on the value of the Company's shares.

Decisions regarding profit warnings shall be made by the Board of Directors and are published as a stock exchange release.

8 Leaks and rumors

QPR does not comment on rumors. However, QPR reacts to rumors and leaks publicly and without any unnecessary delay if they have or may have a material impact on the value of the Company's shares.

This policy has been approved by the Board of Directors on 15 December 2021.

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