Rules of Hepsor AS Bonds Subscription Process (Auction)

1. The Organizer of the Auction – AS LHV Pank, Registry Code 10539549 legal address: Tartu mnt 2, 10145 Tallinn, Estonia hereinafter “the Organizer”.

2. The Provider of Subscription Undertakings and settlement instruction delivery – AS Nasdaq Tallinn, Registry Code 10359206, legal address: Maakri 19/1, 10145 Tallinn, Estonia, hereinafter “Exchange”.

3. The subject of the Subscription process – public offering of up to 3 000 bonds of **Hepsor AS** (hereinafter, “**the Issuer**”) with a nominal value of EUR 1 000 and an interest rate of 9.50 per cent per annum, and ISIN code EE0000005213 (hereinafter, “**the Securities**”). In case of oversubscription, the offering may be increased up to 5 000 bonds. The offering may be decreased by the amount unsubscribed. The offering is directed to investors in Estonia, Latvia and Lithuania.

4. The Auction’s participants – only licensed credit institutions or investment firms to whom the status of the Exchange Member has been assigned and who have access to the Nasdaq Fixed Income Trading System, are eligible to participate in the Auction. All Nasdaq Tallinn Members, having access to the Nasdaq Fixed Income Trading System, may participate in the Auction by submitting orders on their own account or on behalf of their clients. The Retail offering is directed to all investors in Estonia, Latvia and Lithuania.

5. The Place of Subscription process – orders shall be submitted as buy orders entered in the Exchange’s Nasdaq Fixed Income Trading System (hereinafter, collectively referred to as the “**Trading system**”). **Orders for Estonian investors can be entered through Nasdaq CSD.**

6. The Subscription period – the period of Subscription process takes place from August 25th, 2026, 10:00 EEST (hereinafter, “the Start date”) until September 4th, 2026, 15:30 EEST (hereinafter, “the End date”). All times denoted are in EEST.

7. Settlement procedure – the settlement date for the Subscription is 11th of September 2026. The Settlement is provided by Nasdaq CSD SE. The Settlement for the Subscription shall be made according to delivery versus payment (DVP) principle individually for each transaction (gross settlement). The title to the Securities purchased in the Subscription process is obtained upon a Securities transfer to a buyer’s respective financial instrument account which is done simultaneously with making the cash payment for the purchased Securities.

8. All Subscription orders should be submitted in the Trading System as buy orders in the auction orderbook. The Exchange Members can enter buy orders in the Trading system during the Subscription period on the first day of the Subscription period from 10:00, every Exchange

trading day from 9:00 to 16:00 or until 15:30 on the last day of the Subscription period. The orders can be modified or cancelled until 15:30 on the last day of the Auction period. After 15:30 on the last day of the Subscription period orders cannot be entered, modified, or cancelled.

9. The Exchange Member is responsible for entering its clients' orders into the Trading system according to these Rules. The order submission of Exchange Member's clients takes place according to the Exchange Member's internal rules and procedures.

10. The Subscription process is hidden – the Exchange Members can only see their own orders in the order book.

11. Investor orders shall be entered in the product segment "TSE Bond IPO" orderbook HEPSORBOND_02.

12. The buy order must include:
    a. Price of one security;
    b. Number of securities;
    c. Type of the order – limit
    d. Client reference;
    e. Order capacity;
    f. Client ID short code (in case order capacity is Agent);
    g. Client ID qualifier (Firm/Personal);
    h. Investment Dec short code (in case order capacity is Principal);
    i. Execution Decision short code;
    j. Time validity – "GTC" (Good-Till-Cancel);
    k. Order reference (optional).

13. The price of one security is fixed at EUR 1 000 or 100.00% of the nominal amount of the security. The minimum investment amount is EUR 1 000 (1 bond).

14. In addition to the order data specified in Paragraph 12 of the Rules, name and surname of a natural person or name of a legal person, natural person's date of birth, natural person's personal identification code or registration code of a legal person, address of natural or legal person, client's country of residence, natural person`s citizenship, the number of residence permit of European Economic Area or in Switzerland for citizens of Russia and Belarus, the date of expiration of residence permit of European Economic Area or in Switzerland for citizens of Russia and Belarus, investor category (retail or institutional), securities account number, client´s account operator´s BIC code shall be provided. Subscription orders submitted through a nominee account will only be considered eligible if, by the end of the business day on which the Subscription orders are submitted, the Exchange Member has transmitted to the Exchange the details of the subscribed investor via a nominee account. This information shall be sent in an

encrypted Excel file to e-mail TSBaltic@nasdaq.com by 17:00 on the day the order is entered in the Trading system. Orders entered on prior days will also be shown here. The additional data provided specified above shall be linked with the Client/Order reference of the entered order by the Client's account operator.

15. Order allocation will be performed by the Issuer according to the rules set in the Prospectus and will be done outside the Exchange's Trading system. Trade information will not be available in the Exchange's Trading system. The Prospectus will be made publicly available one business day prior to the start of the Auction at website www.nasdaqbaltic.com.

16. The Exchange shall immediately but not later than the next business day after receiving information on order allocation from Organizer, send settlement instructions to Nasdaq CSD SE for settlement of the trades made as a result of the Subscription process. The Exchange Member is responsible for the fact that its settlement agent, that provides settlements for the trades made as a result of the Subscription process according to the information specified in the settlement instructions, makes approvals for Nasdaq CSD SE settlements. The Exchange member must agree with its account operator that cash for auction trades settlement must be transferred to the dedicated cash account (DCA) for night time settlement. Cash should be transferred to DCA after 20:00 or standing order functionality of T2 GUI should be used.

17. The Exchange Member, in accordance with the Exchange regulations, shall pay commission fees for transactions concluded in the Subscription process on own account or on behalf of its clients according to the fees for auction transactions set forth by the Exchange.

18. The Parties shall at all times comply with the data protection standards as provided under the GDPR, applicable law and data protection policies of the Exchange. The Privacy Letter of the Exchange sets out personal data handling practices under GDPR to safeguard privacy while fulfilling obligations, ensure the efficient operation of markets and satisfy regulatory obligations. The Privacy Letter could be found under this link: https://www.nasdaq.com/privacy-statement.