

DISCLOSURE POLICY

CITYVARASTO OYJ

Approved by the Board of Directors of Cityvarasto Oyj
September 22, 2025

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1 GENERAL INFORMATION

1.1 Introduction and the objectives of the disclosure policy

Cityvarasto Oyj ("**Cityvarasto**" or the "**Company**") is a Finnish public limited company whose shares are traded on the Nasdaq First North Growth Market Finland multilateral marketplace maintained by Nasdaq Helsinki Ltd ("**Nasdaq Helsinki**"). This disclosure policy has been approved by the Board of Directors of the Company, and it describes the key principles and practices that Cityvarasto adheres to in its communication with capital markets, the media and other stakeholders. The disclosure policy will be reviewed periodically and updated as necessary.

The Company complies with applicable EU and Finnish legislation, such as the Securities Markets Act (746/2012, as amended) and the Market Abuse Regulation ((EU) N:o 596/2014, "**MAR**") in all disclosure and communications. Furthermore, the Company complies with the Nasdaq First North Growth Market Rulebook for Issuers of Shares, applicable on the Nasdaq First North Growth Market Finland multilateral marketplace maintained by Nasdaq Helsinki ("**First North Rulebook**") and, as applicable, other rules and Guidelines for Insiders of Nasdaq Helsinki, the regulations and guidelines of the European Securities and Markets Authority ("**ESMA**") and the Finnish Financial Supervisory Authority, as well as principles and other internal guidelines of the Company.

The aim of the disclosure policy is to ensure that, for the basis of price formation of Cityvarasto's financial instruments, all parties have access to equal, fair, adequate and simultaneous information on the Company and its business. The disclosure policy aims to ensure proper disclosure of information. The key disclosure principles of Cityvarasto are consistency, accuracy, transparency, activeness and fairness. Cityvarasto communicates information, whether positive or negative, consistently and simultaneously to the capital markets and stakeholders.

The principles of the disclosure policy apply to the whole Cityvarasto group. This disclosure policy has been approved by Cityvarasto's Board of Directors on September 22, 2025 and will be updated as necessary.

In accordance with the First North Rulebook, Skandinaviska Enskilda Banken AB (publ) Helsinki Branch acts as the Company's certified adviser.

2 FINANCIAL REPORTING

Cityvarasto publishes its financial statements release, annual financial statements and the related auditor's report, the report of the Board of Directors, half-year report and interim reports as a company announcement in accordance with a pre-announced annual schedule.

Before the beginning of each financial year, the Company publishes an event calendar, including the dates of publication of the Company's financial reports and the date of the Company's Annual General Meeting in a company announcement. The calendar is also published on the Company's website.

3 ONGOING DISCLOSURE OBLIGATION

Cityvarasto will publish inside information as soon as possible as a company announcement, unless the conditions for delayed disclosure are met. The obligation to publicly disclose inside information and the procedure for delaying disclosure are discussed in more detail in the Company's insider guidelines. It will be stated in the title of the company announcement in which Cityvarasto discloses inside information that the disclosed information is inside information.

Inside information means information of a precise and undisclosed nature relating directly or indirectly to the Company or one or more Company's financial instruments and which, if made public, would be likely to have a significant effect on the prices of the Company's financial instruments or the prices of related derivatives.

4 MANAGERS' TRANSACTIONS

Cityvarasto will publicly disclose transactions in the Company's financial instruments executed by the Company's managers and persons closely associated with them as a company announcement promptly and no later than two (2) working days after receiving the notification. A manager refers to a member of the Board of Directors, the CEO and the member of the Group Management Team. Disclosure obligation of managers' transactions is specified in more detail in the Company's insider guidelines.

5 OTHER INFORMATION TO BE DISCLOSED PURSUANT TO REGULATION AND THE RULES OF FIRST NORTH

The Company shall also disclose through company announcement other information to be disclosed pursuant to the regulations and the First North Rulebook, including the following:

- Financial reports
- Notice of general meeting and decisions of general meeting
- Information on the issuance of financial instruments
- Changes in the Board of Directors or senior management and change of auditor or certified adviser
- Decision on the introduction of a share-based incentive scheme (if any)
- Transactions between the Company and its related parties outside the normal course of the Company's business
- Decisions on listing of the Company's financial instruments
- Event calendar on the publication dates of the financial reports
- Notifications of major holdings
- Other information required to be disclosed under the applicable regulations or the applicable rules of Nasdaq Helsinki.

Company announcements are published in accordance with the current message categories of the First North Growth Market marketplace maintained by Nasdaq Helsinki.

6 RELEASES

6.1 Company announcements

Information covered by the financial reporting obligations and ongoing disclosure obligations described above is published as a company announcement. Inside information subject to ongoing disclosure obligation may include significant new projects, contracts, mergers and acquisitions, litigation or other matters relating to the Company's activities. The Board of Directors or the CEO (depending on the nature of the release) approves company announcements prior to their publication and delivery to Nasdaq Helsinki by using the official file delivery system.

Company announcements are distributed simultaneously to the certified adviser and key media via applicable distribution channels. In addition, company announcements include the contact details of the people responsible for giving further information on the matter, as well as the name and contact details of the certified adviser. Company announcements are available on the Company's website for at least five years after their publication. All announcements are also published simultaneously on the Company's website. The Company's reporting languages are Finnish and English.

6.2 Other releases

News items that do not contain inside information or information required to be disclosed as a company announcement under the First North Rulebook, but which the Company considers to be newsworthy or otherwise of interest to the Company's stakeholders, may be published on the Company's website as press releases, other releases or news items. Such releases may concern matters of local or professional media interest, such as the acquisition of an individual self-storage facility, opening, expansion, progress made or technical solutions or methods used in the construction of a facility, as well as recruitment matters and events related to the business operations of subsidiaries. The CEO reviews and approves other releases prior to their publication.

6.3 Information to be provided to Nasdaq Helsinki and the certified adviser

The Company shall notify the certified adviser as soon as possible in respect of new issues, name changes, splits and other similar corporate actions. Where necessary, the Company will consult the certified adviser prior to deciding on any such actions. The certified adviser is responsible for notifying such information to Nasdaq Helsinki, which undertakes to disseminate the information to the market. Furthermore, the Company shall notify the certified adviser if it decides to delay a public disclosure of inside information, in which case the Company is required to open an insider project in accordance with the insider guidelines.

In addition, the Company shall notify Nasdaq Helsinki and the certified adviser immediately of circumstances that might necessitate a suspension of trading, such as a suspected or concluded leakage of inside information, as well as, as soon as practically possible, of information that the Company intends to disclose and is assumed to be of

extraordinary importance for the Company. The Company shall also notify Nasdaq Helsinki of any substantial changes set out in the First North Rulebook that might lead to a change of identity as soon as the Company becomes aware of the changes. Furthermore, the Company shall provide Nasdaq Helsinki and the certified adviser with any other information required by the legislation in force from time to time or by the applicable rules of Nasdaq Helsinki.

7 RUMOURS AND ANALYST FORECASTS

7.1 Rumours

Cityvarasto does not comment on public rumours. However, in the event that unfounded market rumours or blatantly inaccurate information may have a material impact on the price of the Company's financial instruments, the Company will consider correcting such market rumours or inaccurate information without delay.

If a market rumour clearly relates to inside information, the publication of which the Company has delayed, and the rumour is sufficiently specific to indicate that the confidentiality of such inside information can no longer be guaranteed, the Company will publicly disclose the inside information as a company announcement as soon as possible.

Information relating to market rumours concerning the Company shall be provided primarily by the CEO and secondarily by the Chairman of the Board of Directors of the Company.

7.2 Analyst forecasts

The Company does not correct analyst forecasts or give comments on the Company's valuation or share price development. The Company is not responsible for any valuations made by representatives of the capital markets or comment on these. The Company may review the accuracy of already published information in the analyst estimate or report upon request, but it does not give comments on the conclusions.

If the Company discovers that the conclusions presented by an analyst on the value of the Company's financial instruments significantly differ from the Company's own estimate, the Company shall consider whether the information it has provided has been correct and sufficient for making a justified estimate on the Company and its financial instruments.

8 FUTURE OUTLOOK

The Company may present in its financial statements release, half-year report and interim reports a numerical estimate of the development of revenue and profit for a selected reporting period (guidance). Furthermore, the Company may provide supplementary information on, among other things, the market prospects.

9 PROFIT WARNING

The Company will issue a profit warning as soon as possible as inside information via a company announcement if it estimates that the Company's profit or financial position or their likely development has changed materially from the information previously disclosed by the Company. The profit warning is based on the Company's earlier forecasts or what

can be reasonably inferred from information previously disclosed by the Company. The Board of Directors of the Company decides on issuing a profit warning. In an extraordinary situation, if the Board of Directors cannot reach quorum within a timeframe required by a profit warning, the CEO can decide on issuing a profit warning together with the Chairman of the Board of Directors. The issuing of a profit warning must not be delayed.

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INVESTOR COMMUNICATIONS

The objective of the Company's investor communications is to support the correct value creation of the Company's financial instruments by communicating effectively with the different parties on the capital markets. The Company's management meets with investors and analysts at events and meetings aimed at presenting the Company, its business, strategy, operating environment, objectives and financial result. Discussions with investors, analysts and the media are limited to information that has already been published or made publicly available on the market.

The CEO and the CFO are responsible for issuing statements concerning the Company to the capital markets. The primary contact person for representatives of the capital markets is the CEO, with the CFO as the secondary contact person. Should it be necessary to confirm whether the Company is subject to a disclosure obligation, the Company shall consult a certified adviser, an external legal adviser, a communications agency or Nasdaq Helsinki, if necessary.

The CEO or other members of the management of the Company do not comment on matters concerning the Board of Directors of Cityvarasto. The Board of Directors is usually represented by the Chairman.

Others may make statements in matters related to the Company only when specifically authorised by the CEO.

The HR and Communications Director of the Company is responsible for the practical organisation of investor communications, such as coordinating and organising communication related events and interviews.

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CRISIS COMMUNICATIONS

The CEO and the HR and Communications Director of the Company lead Cityvarasto's crisis communications. The objective of the communications is to share information in a coordinated, rapid, clear, equal and transparent way.

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WEBSITE AND SOCIAL MEDIA

Cityvarasto's website (www.cityvarasto.fi) is the Company's principal channel of communication for up-to-date investor communication. The Company publishes company announcements on its website in Finnish and English. The language of other releases is Finnish, but they can also be published in English.

The Company keeps the company announcements and financial reports it has published on its website for at least five (5) years.

SILENT PERIOD AND CLOSED WINDOW

Regularly released financial reports are preceded by a silent period starting 30 days before the day of the disclosure of the next financial report. During the silent period, results or factors affecting it are not discussed by the representatives of the Company with the representatives of capital markets or media. The silent period ends when the financial statements, interim report or the half-year report is published.

Should an event requiring immediate disclosure (such as a significant business transaction) occur during the silent period, Cityvarasto shall publicly disclose said information without delay in accordance with applicable disclosure obligations and procedures and may comment on said event after the disclosure. Furthermore, Cityvarasto may, at its discretion, publish news related to the Company's business as other releases during the silent period.

In accordance with the Company's insider guidelines, Cityvarasto's managers and persons receiving financial information are subject to a closed window before the publication of the interim report, half-year report or financial statements release. Should the financial statements contain material information that has not been published previously in the financial statements release, the closed window applies also to the financial statements. Closed window applies during the 30-day period prior to the publication of a financial report and on the publication day (30+1). Transactions in the Company's financial instruments during the closed window, either on own account or for the account of a third party, directly or indirectly, are prohibited.

INSIDER GUIDELINES

Cityvarasto's insider guidance and administration comply with the requirements of MAR, the guidelines and regulations of ESMA and the Finnish Financial Supervisory Authority, Finnish national legislation, the First North Rulebook, the Nasdaq Helsinki Guidelines for Insiders, as well as the insider guidelines approved by the Board of Directors of the Company.

INTERPRETATIONS AND DEVIATIONS, AMENDMENTS AND MAINTENANCE

The Board of Directors of the Company is responsible for the supervision and interpretation of the Company's disclosure policy. The CFO and the HR and Communications Director of the Company give further instructions regarding the execution of the disclosure policy.

In individual cases, for weighty reasons and within the limits of applicable laws and regulations, the Chairman of the Board of Directors and the CEO of the Company together may deviate from the disclosure policy.

The Board of Directors of the Company decides on the amendments to this disclosure policy. However, minor or technical amendments to this disclosure policy may be approved by the CEO of the Company.

This disclosure policy has been prepared in Finnish and English. Where conflicts arise, the Finnish-language text shall prevail.