Privacy statement for insider management

Date: 31 December 2025

Controller:	Lassila & Tikanoja plc Business ID: 3555336-9
Contact details in matters concerning the data file	Name: Lassila & Tikanoja plc Postal and street address: Valimotie 16, FI-00380 Helsinki, Finland Tel. +358 (0)10 636 111 (exchange) Email: tietosuoja@lassila-tikanoja.fi
Name of the register:	L&T Group insider management register
Legal basis for the processing of personal data:	The processing of personal data is based on the fulfilment of L&T's statutory obligations (such as Articles 18 and 19 of the Market Abuse Regulation).
Purpose of the processing of personal data:	Personal data may be processed for the following purposes: • compliance with the Market Abuse Regulation (MAR), the Securities Markets Act and related regulations • compliance with the rules and Guidelines for Insiders of NASDAQ Helsinki and the insider guidelines of L&T • compliance with the regulations and instructions of the European Securities and Markets Authority (ESMA) and the Finnish Financial Supervisory Authority • compliance of the Finnish Corporate Governance Code for listed companies
Data subject categories:	The data file contains personal data on the following categories of data subjects: • Lassila & Tikanoja plc's managers and any individuals and communities in their immediate circle (MAR) • Persons to be recorded in Lassila & Tikanoja plc's project or event-specific insider lists (MAR) • Persons included in Lassila & Tikanoja plc's financial reporting team • Lassila & Tikanoja plc's (public) insiders with the duty to declare and any individuals and communities in their immediate circle, permanent insiders and persons recorded in project-specific insider data files (Securities Markets Act, so-called "frozen" insider data file)
Regular sources of data:	The data contains the following personal data on management in accordance with the MAR: • name (first name, last name and previous last names) • personal identification number • address • telephone number • e-mail address • natural persons and legal persons in the manager's immediate circle • transaction notifications

The data contains the following personal data on individuals in the immediate circle of management in accordance with the MAR:

- name (first name, last name and previous last names)
- personal identification number or business ID
- address
- telephone number
- e-mail address
- grounds for inclusion in the manager's immediate circle
- name, e-mail address and mobile phone number of contact person acting on behalf of the community
- transaction notifications

The data contains the following personal data on the individuals registered in lists of insiders:

- name (first name, last name and previous last names)
- company name and address
- direct telephone number and mobile phone number of the workplace
- title and grounds for inclusion as an insider
- date and time of gaining insider information
- date and time of terminating the individual's access to insider information
- date of birth
- personal identification number
- personal home number and mobile phone number
- complete home address (street address and number, city, postal code and country)

The data contains the following personal data on individuals included in the financial reporting team:

- name
- title/employer
- grounds for inclusion in the financial reporting team
- date of registering the data subject in the reporting team and removing them from the reporting team

The data contains the following personal data on (public) insiders with the duty to declare and individuals and communities in their immediate circle:

- name
- personal identification number
- home address and home state
- start and end date of being an insider
- grounds for inclusion as an insider
- natural persons in the immediate circle of an insider with the duty to declare and their names, personal identification numbers, addresses, start and end date of being in the immediate circle and grounds for inclusion in the immediate circle
- legal persons (controlled corporations and organisations in which influence is exercised) in the immediate circle of an insider with the duty to declare and their names, business IDs, addresses, start and end date of being in the immediate circle and grounds for inclusion in the immediate circle

- information pertaining to shareholding

The data contains the following personal data on the permanent insiders and individuals registered in project-specific insider data files:

- name
- personal identification number
- home address
- title at L&T
- start and end date of being an insider and grounds for inclusion as an insider regarding permanent insiders
- date and time of gaining insider information and date and time of terminating the individual's access to insider information regarding individuals registered in project-specific insider data files

Regular sources of data:

The data is primarily collected from the data subject or a party authorised by them. Some of the information may be collected from public sources (e.g. YTJ). Information pertaining to shareholding is obtained from the book-entry system.

Regular disclosure and transfer of data:

Personal data in the data file may be disclosed to regulatory authorities, such as the Financial Supervisory Authority, NASDAQ Helsinki, ESMA and the police.

L&T is obligated to publish transaction notifications in accordance with MAR in a stock exchange release. In addition, L&T is obligated to ensure that the information pertaining to the shareholding of insiders with the duty to declare is available on the company's website.

The personal data are not regularly disclosed to third parties outside the L&T group companies.

L&T uses external service providers to process personal data for the following services:

- Systems maintenance, development and troubleshooting.

Each service provider processes personal data in accordance with the data processing agreement only to the extent necessary to provide the service.

Personal data may also be transferred to Euroclear Finland Oy and/or Black Woodpecker Software Oy, which processes personal data on behalf of L&T in accordance with the obligation of confidentiality and the binding data processing agreement required by law. Project-specific insider lists are maintained in Euroclear Finland Oy's electronic insider system.
In other respects, the data in the data file are not regularly disclosed to third parties outside L&T group.

Transfer of data outside the EU or EEA:

Personal data are deemed to be transferred outside the EU/EEC in connection with the provision of information technology services when the information can be accessed outside EU/EEC. An agreement based on EU standard contractual clauses has been made with the service provider regarding the transfer. The EU standard contractual clauses can be viewed at http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010D0087&from=en.

Principles of register protection:

The data in the data file is stored in an information system that uses both technological and programmatic measures to ensure the sufficient level of data security. Each person using the data file has a personal user name and password to the system. Only designated L&T persons and other employees of other companies acting on or for L&T's behalf, who have signed a non-disclosure agreement shall have access to the data in the register to the extent required by their duties.

Data retention period:

The personal data shall be stored for as long as is necessary in order to fulfil the purpose of the personal data or any statutory obligations. Primarily, the data shall be stored for at least five (5) years after the final update of the data or after the grounds for marking the data have expired.

Rights of the data subject:

Right of inspection and right to request rectification or erasure

Data subjects have the right of inspecting their personal data entered in the register. In addition, data subjects have the right to request the rectification of inaccurate data and erasure of data. Inspection, rectification and/or erasure requests must be submitted in writing by using the above contact information.

Other rights

According to the General Data Protection Regulation, data subjects have the right to object to or request a restriction on the processing of their personal data and to lodge a complaint regarding the processing of their personal data to the data protection authority.