

INVESTOR RELATIONS POLICY

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CONTENTS

1. OVERALL OBJECTIVES	3
2. INFORMATION DISCLOSURE	3
3. SIMCORP'S INVESTOR RELATIONS ACTIVITIES AND SERVICES	3
4. STANDING INVESTOR RELATIONS PRACTICES IN SIMCORP	4
4.1. ANNOUNCEMENT OF ORDERS	4
4.2. QUOTES FROM SIMCORP'S EXECUTIVE MANAGEMENT BOARD	4
4.3. GUIDANCE	4
4.4. QUIET PERIOD	4
4.5. NO COMMENTS ON SENSITIVE BUSINESS ASPECTS, SHARE PRICE MOVEMENTS, ETC.	4
4.6. AUTHORIZED SPOKESPERSONS	5

INVESTOR RELATIONS POLICY

1. OVERALL OBJECTIVES

SimCorp's investor relations activities aim at insuring that:

- The market price of SimCorp's shares reflects the fair value of the company at all times with as little volatility as possible based on the information available to the market.
- SimCorp's shares remain as liquid as possible under all market conditions.
- SimCorp maintains access to the capital markets at all times on the most favorable terms possible.
- SimCorp's Executive Management Board has adequate information regarding developments in the financial markets that may be relevant for the preparation of the company's long- and short-term plans.

To achieve these objectives, SimCorp will endeavor to be respected as a trustworthy and open organization recognizing the requirements of the investment community in general and SimCorp's stakeholders in particular for timely, updated, accurate, and adequate information disseminated to everyone simultaneously about the company's business, strategic, and financial development.

In addition, SimCorp will compile information about the investment community's views on the company by sustaining an ongoing dialogue with investors and equity analysts.

2. INFORMATION DISCLOSURE

SimCorp will disclose financial and corporate information providing the investment community and the press with the necessary insight to form a qualified opinion of the company and its prospects.

In compliance with the legal and regulatory requirements set out in the Market Abuse Regulation and by Nasdaq Copenhagen and other public authorities, SimCorp will disseminate this information through announcements to Nasdaq Copenhagen, press releases and statements to the press, the company's web site and other suitable written and electronic media. Further, investors and analysts may sign up for the company's e-mail service through which SimCorp's

press releases are distributed.

In the selection of distribution channels for its financial and corporate information, SimCorp will give priority to ensuring immediate access for all stakeholders on equal terms.

SimCorp encourages equity analysts to take up coverage of the company and offers various information services and programs to facilitate the efforts of new analysts to do so.

3. SIMCORP'S INVESTOR RELATIONS ACTIVITIES AND SERVICES

In order to meet SimCorp's overall objectives set out in Section 1, the company's investor relations activities aim at ensuring the highest possible awareness within the investment community of the company and its business operations and prospects.

The overall responsibility for investor relations resides with the company's CFO. The CFO is the primary point-of-contact for and acts as the company's spokesperson in the ongoing dialogue with analysts, shareholders and other investors. The company's Executive Management Board and any employee of SimCorp's Investor Relations department, however, will participate in this dialogue with the investment community as necessary and appropriate.

The CFO is responsible for designing policies and procedures for the investor relations activities, including:

- Procedures for ensuring compliance with legal and regulatory requirements at all times.
- Procedures for one-on-one or group meetings with investors, equity analysts and the press following the release of financial reports and other relevant corporate presentations.
- Policies and procedures for content management of the Investor Relations section of SimCorp's web site.
- Preparation of Q&As related to all financial announcement presentations.
- Documentation of all Investor Relations meetings held.

4. STANDING INVESTOR RELATIONS PRACTICES IN SIMCORP

4.1. Announcement of orders

SimCorp's business development depends on a steady inflow of new orders for its products and services as well as significant orders for additional software and / or user licenses from existing clients. To disclose the progress of business between quarterly and annual reports, SimCorp has adopted a general policy of announcing new binding contracts to Nasdaq Copenhagen in the following events:

- a. If SimCorp enters into a binding contract with a client and the committed average annual value of the contract is EUR 2 million (or above), SimCorp will communicate to the market that it has signed a "*large contract*"; or
- b. If the above is not met, but SimCorp still is of the opinion that the contract has strategic importance to the company, SimCorp will communicate to the market that it has signed a "*contract of strategic importance to the company*".

For the purposes of this section 4.1, "*committed average annual value of the contract*" shall mean the following:

The total commitment by the client towards SimCorp

- a. subscription fees (in the case of a subscription agreement); and/or
- b. license fees and committed maintenance fees (in the case of a perpetual license agreement); and/or
- c. any cloud operational service fees (however excluding cloud services fees which are passed through to sub-suppliers of SimCorp) and/or
- d. any recurring professional services fees under a so-called enterprise assistance agreement,

during the initial term of the contract divided by the number of years during the initial term of the contract.

4.2. Quotes from SimCorp's Executive Management Board

In the event of an announcement of a contract pursuant to Section 4.1, a member of SimCorp's Executive Management Board will as part of the announcement express SimCorp's view on the contract at hand, including how the contract contributes to SimCorp reaching its strategic goals.

4.3. Guidance

SimCorp provides guidance to the investment community in the form of forward-looking statements regarding expected future revenues and earnings in the quarterly and annual reports in an effort to stabilize market valuation and increase liquidity of its shares and enable the investment community to better evaluate the company and its prospects.

However, SimCorp does not provide comfort opinions or otherwise comment on the likelihood that it will meet, exceed or fall short of its guidance in terms of revenues or earnings. Nor will the company comment on the likelihood that it will meet, exceed or fall short of equity analysts' estimates, either on an individual or consensus basis. This applies in all phases of the quarterly reporting cycle.

4.4. Quiet period

SimCorp will observe an un-announced quiet period starting four weeks prior to the release of annual and quarterly reports. In this period the release of material corporate information will be kept to the minimum set out by the Market Abuse Regulation and Nasdaq Copenhagen. SimCorp will though always give priority to ensuring that all stakeholders have access to relevant information at equal terms – also during the quiet period.

4.5. No comments on sensitive business aspects, share price movements, etc.

SimCorp observes a firm policy of not disclosing sensitive information regarding development in sales, staff, R&D activities and other aspects that may compromise the company's competitive position in the market.

SimCorp does not comment on share price movements (both in general and SimCorp's) or fluctuations in share trading volumes. SimCorp also refrains from commenting on market rumors or speculative inquiries.

4.6. Authorized spokespersons

Members of SimCorp's Executive Management Board, the Chairman of the Board of Directors and any employee of SimCorp's Investor Relations department are designated as authorized spokespersons for the company. No individual employee other than the designated authorized spokespersons may communicate directly with equity analysts and investors.

From time to time, other staff within SimCorp may be designated by an authorized spokesperson to respond to specific inquiries as necessary or appropriate. Investors should not rely on statements made by individuals other than authorized spokespersons or individuals designated by the authorized spokespersons.

These rules are adopted in Copenhagen on December 11, 2020.

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ABOUT SIMCORP

SimCorp provides integrated, best-in-class investment management solutions to the world's leading asset managers, fund managers, asset servicers, pension and insurance funds, wealth managers and sovereign wealth funds. Regardless of how you deploy it, SimCorp's core solution, SimCorp Dimension[®], and its life-cycle services support the entire investment value chain and range of instruments, all based on a market-leading IBOR. SimCorp invests around 20% of its annual revenue in R&D, helping clients develop their business and stay ahead of ever-changing industry demands. Listed on Nasdaq Copenhagen, SimCorp is a global company, regionally covering all of Europe, North America, and Asia Pacific.

For more information, please visit www.simcorp.com

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