



# **INSIDER POLICY AND GUIDELINES**

**Concentric AB**

**Corporate ID No. 556828-4995**

Adopted by the Board of Directors of Concentric AB on 7<sup>th</sup> November 2017



## 1. PURPOSE

This policy relates to the employees and other persons set out in section 2 below. It is intended to be a complement to Swedish laws governing (i) trading in financial instruments of Concentric AB (the “Company”) (ii) disclosure of insider information, and (iii) reporting obligations of the Company and persons with insider status, such as the Act on Penalties for Market Abuse in connection with trade in Financial Instruments; the Act concerning Reporting Obligations for Certain Holdings of Financial Instruments; the Act on Financial Instruments Trading.

On the 3rd of July 2016 the Regulation (EU) No. 596/2014 of the European Parliament and of the Council on market abuse (MAR) entered into force and become directly applicable in Swedish law. The rules governing the reporting obligation for insiders in the Act (2000:1087) concerning Reporting Obligations for Certain Holdings of Financial Instruments (ROCHF), in addition to certain issuers’ obligation to keep an insider list, is repealed. These will be replaced in the aforementioned Act with references to Article 18 (Insider lists) and Article 19 (Managers’ transactions) in MAR.

## 2. SCOPE

This policy applies to all employees, directors and such other persons who have been informed by the Company as holding an insider position in the Company and in respect of any and all transactions in the financial instruments of the Company.

This policy will be provided to all persons to whom it applies upon its adoption by the Board of Directors, and to all new employees, directors and other persons reported as holding an insider position in the Company at the start of their employment or relationship with the Company. In addition, the management of the Company is responsible for informing all employees not explicitly covered by this policy about their duties and obligations under Swedish law governing insider trading and disclosure of insider information (i.e. non-public information, which is likely to have a material impact on the price of the financial instruments of the Company).

The CFO of the Company has been designated to function as Compliance Officer for the purpose of this policy.

## 3. INSIDER TRADING

**Please note that the rules and guidelines of this policy apply above and in addition to statutory rules on trading prohibitions when in possession of insider information.**

### *3.1 Closed periods*

Trading in financial instruments of the Company is prohibited during a period of thirty (30) days prior to the publication of financial reports, the day of publication included. If it is more than 30 days from the end of a quarter to the release of the report; then the silent period shall start on the last working day in the current quarter. For example: if the release of the report for Q3 is 8 November and the last working day in the current quarter is 29 September, then the silent period shall begin 29 September. In this case the trading in financial instruments of the Company will be prohibited during a period of 40 days prior to the publication of the financial report.

### *3.2 Trading*

Notwithstanding the rules and guidelines of this policy, it is the responsibility of each person who engages in trading in financial instruments of the Company to ensure that no statutory rules are violated by such trading.



### *3.3 Reporting to Finansinspektionen*

An insider person, or as defined in the new rules as a “person discharging managerial responsibilities” is obliged to report changes in holdings in Concentric AB within three (3) business days to the Swedish Financial Supervisory Authority (Sw. Finansinspektionen). The obligation to report, however, only applies once a total transaction amount of EUR 5,000 has been reached within the calendar year. Persons discharging managerial responsibilities, and to them closely associated persons, are to report their transactions to the company as well as to Finansinspektionen.

## **4. DISCLOSURE OF INSIDER INFORMATION**

Please note that no person is permitted to disclose insider information to anyone, within or outside the Concentric group, including family, friends, co-workers or others except if disclosed in the proper performance of that person’s duties to the group.

## **5. INSIDER REGISTER MAINTAINED BY THE COMPANY**

The register of persons holding an insider position in the Company, which is maintained by the Company since 3 July 2016, shall be reviewed on a regular basis. Any and all changes that affect the position of a person included in such register, or not yet included but who has obtained insider status and, therefore, should be included in the register, shall be reported to the Compliance Officer as soon as they occur.

The Compliance Officer shall administer the reporting of the Insider Register within the Company. Upon reporting any change in the insider register, the Compliance Officer shall provide the person to whom such change relates with information regarding his or her insider position and the legal consequences thereof. It should be noted that each person holding an insider position is subject to a reporting obligation of changes in the holdings of Concentric shares in relation to the Swedish Financial Supervisory Authority and is individually responsible for the fulfillment of such reporting obligation. See also 3.3 above.

## **6. INSIDER LISTS (LOG BOOK) MAINTAINED BY THE COMPANY**

The Company has an obligation to prepare and maintain internal insider lists of persons that, by reasons of employment (or by otherwise working for the Company), have access to insider information about the Company. The insider lists shall include information about all persons having access to insider information, the type of insider information and the date when the lists were updated. The Compliance Officer shall be responsible for preparing and maintaining the insider lists.

To enable the Compliance Officer to fulfill his or her duty, the existence of insider information shall be immediately reported to the Compliance Officer. The Compliance Officer shall inform any person in writing upon including such person in an insider list. The insider lists shall be continuously updated.

According to this policy CEO and CFO (and the Board of Directors) are so called permanent insiders, which mean that they do not have to be register on the different log books. They will instead be treated as they always have access to insider information.

Upon request, the Company is obliged to provide a copy of the insider lists to the Swedish Financial Supervisory Authority.

## **7. CRIMINAL LIABILITY**

It may constitute a criminal offence under Swedish law to disclose insider information, or to trade in the financial instruments of the Company or encourage others to trade whilst in possession of such information.



## **8. INQUIRIES**

Please direct all inquiries regarding any of the provisions or procedures of this policy to the Compliance Officer or the CEO.

**The Company accepts no liability whatsoever for any loss or damage howsoever arising in connection with the compliance with this policy or otherwise.**

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