



# **INFORMATION POLICY**

**Concentric AB**

**Corporate ID No. 556828-4995**

Adopted by the Board of Directors of Concentric AB on 6<sup>th</sup> April 2016



# INFORMATION POLICY

Concentric AB (publ)

## 1 Purpose of communication policy

**The information policy outlines the guidelines for all internal and external communication. The purpose of the information policy is to clarify how the responsibility for communication should be divided and to contribute to a uniform communication within and outside the Company.**

- 1.1 The latest version of this policy shall always be available on the Company's intranet. However, it should be noted that the policy is an internal document that is not to be disclosed outside the Company.
- 1.2 Disclosure of information shall be in conformity with the the NASDAQ OMX Stockholm Rule Book of Issuers ("[NASDAQ OMX Rule Book](#)") and [recommendations](#) issued by NASDAQ OMX Stockholm.

## 2 Information that must be disclosed

**The fundamental purpose of the NASDAQ OMX Rule Book is that all stakeholders shall be given opportunity to trade on the same conditions. Price-sensitive information shall reach all stakeholders simultaneously and all shareholders and potential shareholders shall be treated equally.**

- 2.1 Price-sensitive information includes annual accounts, interim reports, forecasts, and changes in management and/or of the Board of Directors that require mandatory disclosures. Also other information may affect the share price, such as major customer agreements and co-operations, major events that may lead to unexpected changes in financial results, takeovers or the closure of businesses. No such information that could be considered to be price-sensitive may be submitted to individual shareholders, journalists or sell-side analysts.
- 2.2 If there is any price-sensitive information available, it should immediately be disclosed in the form of a press release in accordance with the [NASDAQ OMX Rule Book](#). This secures that all stakeholders receive the information simultaneously. There are exceptions allowing distribution of information selectively to a third party, but information distributed under such circumstances is considered confidential and the receiver is regarded as an insider. Legal expertise should be consulted when information is about to be distributed selectively.
- 2.3 To reduce the risk of information leakage and of stakeholders being suspected of having gained access to insider information, the Company applies a silent period 30 days prior to the publication of interim reports. During this period, representatives of the Company must refrain from answering questions or commenting on financial developments with reference to the silent period. When an analyst requests comments on analyses and reports, for example, only evident factual errors may be addressed. It may also be permissible to provide information on circumstances previously disclosed, to correct misconceptions, erroneous calculations or evident logical errors and to provide industry statistics. No comments are allowed regarding future-oriented financial information.
- 2.4 Please also refer to the guidelines provided in the [Insider Policy](#) regarding the disclosure and reporting obligations related to price sensitive insider information.



### **3 Spokespersons**

- 3.1 The Chairman of the Board handles information and inquiries regarding the board of directors and the owners.
- 3.2 The CEO handles information and inquiries regarding operational matters of the Company such as business strategies, market analysis and financial position.
- 3.3 The Chairman of the Board and the CEO are supported by the Head of Investor Relations (currently the CFO) and the Corporate Communications manager when fulfilling the duties in accordance with this information policy and the [NASDAQ OMX Rule Book](#).
- 3.4 The Head of Investor Relations is responsible for the day-to-day contacts with the capital market.
- 3.5 The Corporate Communications manager is responsible for the corporate communication supporting the Company's reputation and brand.
- 3.6 Other members of group management have the right to make statements on issues that related to their respective areas of responsibility, although not on issues that may be price-sensitive. As a general rule these officers should co-ordinate with the CEO ahead of any media contacts.

### **4 Media relations**

**The Company shall maintain relations with media in order to support the Company's reputation and brand. The Company shall secure a correct presentation by always aiming to provide relevant information about the Company.**

- 4.1 The Corporate Communications manager is responsible for handling media regarding the Company in general as well as lines of business and companies within the group. All information deemed price-sensitive shall be handled by the Company's CEO and/or CFO.
- 4.2 In order to send coherent and correct messages to the media, the Company's internal guidelines on media relations stipulates that all questions from journalists shall be immediately directed to the Corporate Communications manager.

### **5 Investor relations**

**The objectives of the Investor Relations function is to ensure a fair valuation of the Company to secure financing opportunities on the stock and debt market, increase interest in the investment case and enhance the liquidity of the Company's shares.**

- 5.1 The CFO has executive responsibility for the Investor Relations function. The Corporate Communications manager provides support to plan the work, prepare communication activities and maintain the day-to-day contacts with the capital market.

### **6 Annual General Meeting**

**Shareholders' entitlement to pass resolutions regarding Concentric's affairs is exercised at the Annual General Meeting. The Annual General Meeting is the highest decision-making body for the Company and passes resolutions on such matters as the Articles of Association, appoints members of the Board and the Chairman of the Board, elects Auditors, and decides on the adoption of the income statement and balance sheet as well as the appropriation of the company's profits.**

- 6.1 General Meetings shall be prepared in due time by the CEO and the CFO in consultation with the Company's legal advisor.
- 6.2 The notice of the General Meeting must at least be published in the newspapers described in the Articles of Association, not less than two days prior to the last day of notice.
- 6.3 The [Swedish Corporate Governance Code](#) includes specific requirements regarding documentation and information related to the Annual General Meeting that are to be published on the company website.

## **7 Press releases and financial reports**

**Press releases and financial reports shall provide sufficient information to allow a reasonable understanding of the importance and impact on the Company's operational and financial performance.**

- 7.1 A press release containing price-sensitive information may only be distributed if read and approved by the CEO and the CFO. The distribution of press releases is the responsibility of the Corporate Communications manager. This also applies to any information equivalent to press releases to NASDAQ OMX Stockholm, etc. The CEO shall always be notified and aware of published information.
- 7.2 The most important information shall be clearly presented at the beginning of the press release and the headline shall summarise the content.
- 7.3 All press releases from the Company shall be clearly marked with the Company name and contact details.
- 7.4 Press releases regarded as non price-sensitive are also the responsibility of the Corporate Communications manager.
- 7.5 All distributed press releases shall also be published on the Company's website, [www.concentricab.com](http://www.concentricab.com), in both Swedish and English. The information shall be made available on the website without delay, subsequent to the publication, but not prior to the publication of the press release. Published press releases should be available on the company website for a minimum of three years and financial reports for a minimum of five years.
- 7.6 The Company's Board of Directors has the ultimate responsibility for the accuracy of information in the interim and annual reports. The CFO is responsible for preparing and finalising interim and annual reports.
- 7.7 With regard to interim reports and annual reports, the Company shall comply with the [NASDAQ OMX Rule Book](#) as well as [recommendations](#) issued by NASDAQ OMX Stockholm.

## **8 Meeting with analysts and investors**

**Analyst meetings and Capital Market Days may be held on suitable occasions in order to provide information on a certain topic or improve the understanding of the investment case in general.**

- 8.1 The CEO and CFO are responsible for activities of this kind.
- 8.2 The [recommendations](#) issued by NASDAQ OMX Stockholm shall always be considered and complied with.

## **9 Corporate website**

- 9.1 The Head of Investor Relations and Corporate Communications manager are specifically responsible for revising and updating the home page and the entire sections entitled “About Us”, “Investors”, “Media”, “Worldwide” and “Contact” on the corporate website, which should be done on an on-going basis. Information available on the website should be relevant and up-to-date. More considerable updates of the website should not be carried out without prior approval from the CEO or the CFO.
- 9.2 The [NASDAQ OMX Rule Book, recommendations](#) issued by NASDAQ OMX Stockholm and the [Swedish Corporate Governance Code](#) shall always be considered and complied with in respect of information on the Company’s website.

## **10 Corporate governance**

- 10.1 The Company will report and communicate on Corporate Governance matters according to [national laws](#) and the [Swedish Corporate Governance Code](#) and other requirement set out by [NASDAQ OMX Rule Book](#).

## **11 Social media guidelines**

**Social media, such as Facebook and Twitter, have emerged as an effective method for quick and efficient communication with large and varied audiences. These advantages, however, pose a certain risk if social media is misused. This policy outlines a governance framework for the official use of social media on behalf of the Company.**

- 11.1 All posting to a social media account on behalf of the Company must be consistent with the following guidelines:
- (i) only individuals approved by the Corporate Communications manager are allowed to post information;
  - (ii) postings should not violate any rules in the information policy;
  - (iii) postings should never include confidential or price-sensitive information; and
  - (iv) all approved individuals should act responsibly and think before posting. Information posted to the web, even when removed, may have already been preserved by others and could be reposted.
- 11.2 The [NASDAQ OMX Rule Book](#) shall always be considered and complied with.

## **12 Internal communications**

**The objective for the internal communication is to provide the employees with correct and relevant information regarding the Company’s operations and environment.**

- 12.1 Management on all levels has a duty to inform employees within their area of responsibility. All employees have, in order to perform their tasks, a responsibility to keep themselves informed, preferably using the Company’s intranet.
- 12.2 The Corporate Communications manager shall make sure that press releases also are distributed internally, preferably using the Company’s intranet.

## **13 Information leaks**

- 13.1 The CEO and the CFO shall immediately be contacted in the event of an information leak (or suspected information leak). The CFO shall be responsible for any disclosure of information

regarding the leak, but may also delegate to the Corporate Communications manager to make a clarifying statement.

- 13.2 The Company shall immediately inform NASDAQ OMX Stockholm about any price-sensitive information leak in compliance with the [NASDAQ OMX Rule Book](#).

## **14 Crisis communications**

**The Company shall maintain a high level of readiness and continuously identify potential crises and problems in its operations in order to minimise any damage. In a crisis situation, the objective is to minimise negative effects on the Company's reputation and brand.**

- 14.1 In a potential crisis situation, the appointed Crisis team, consisting of the CFO, Legal Counsel, Communication and Investor Relations advisors should be convened, and the CEO and the Chairman of the Board should be immediately alerted. The Crisis team is responsible for the decisions regarding the issuance of a holding statement, nominating spokespersons and any further actions that may be required.
- 14.2 In the event that the Company receives notice of an approach from a potential acquirer, please refer to the guidelines in the Response Policy.

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