

OX2 Information and Insider Policy

This Information and insider policy was adopted by the Board of Directors of OX2 AB at the board meeting held on 20 July 2023.

Introduction

About: This Policy sets the guidelines for all internal and external communication. OX2 AB, (the “**Company**” or “**OX2**”), shall as a public company listed on Nasdaq Stockholm comply with, for example, the Market Abuse Regulation (EU) 596/2014 (the “**Market Abuse Regulation**”), the act (2016:1306) with supplementary provisions to the Market Abuse Regulation, the act (2016:1307) on penalties for market abuse in the securities market, Nasdaq Nordic Main Market Rulebook for Issuers as well as any other applicable rules and regulations that apply to Swedish public companies that are listed on Nasdaq Stockholm.

Purpose: The purpose of this Policy is to ensure high quality of both internal and external information as well as compliance with laws, rules and agreements.

Fundamental principles: OX2’s fundamental principle is to provide correct, relevant, clear and reliable information to all relevant interested parties. All communication from OX2 aims to create trust and understanding of OX2 among external stakeholders and employees, potential and current, investors and partners, as well as to create and maintain good relationships with various stakeholders.

Application: This Policy applies to the Company and all subsidiaries to the Company.

Governance: The CEO is responsible for the development and necessary updates of this Policy. The CEO may delegate responsibility for the dissemination and application of the Policy. The policy must be revised if necessary. The Communications function is responsible for updating this policy and for publishing the updated version after it has been adopted by the Board of Directors. The Policy is adopted by the Board of Directors.

Related documents: For more detailed guidelines, please refer to appended documents:

- OX2 Code of Conduct
- OX2 Communications strategy
- OX2 Crisis management policy

- OX2 Media guidelines
- OX2 Graphic guidelines
- OX2 Social media guidelines
- Appendix A: 'Guidelines for handling of inside information and other disclosure obligations'
- Appendix B: 'Insider guidelines for board members and employees'

OX2's communication

OX2's communication shall be fast, transparent, objective, well-structured and well-planned. It should support OX2's business strategy and targets; provide investors and other stakeholders with relevant information about OX2; maintain and strengthen OX2's position as a market leader in the industry for renewable energy; and support a positive image and confidence in OX2's brand, offering and people.

Communication channels

The Company's channels for external and internal communication includes:

- Press releases;
- Interim reports and year-end reports;
- Annual reports;
- The website: www.ox2.com and local market websites;
- Analyst and investor contacts and personal contacts;
- Annual General Meeting;
- Capital Markets Day;
- Presentations and meetings with stakeholders;
- Marketing and recruitment;
- Transaction team presentations;
- Internal platform/intranet;
- Social media;
- Internal conferences/meetings;
- Internal company calls; and
- Interviews with the media.

Language

OX2's corporate language is American English. The Company publishes regulatory information as well as relevant corporate or financial information in both Swedish and English. The official brand language is English, but the Company communicates in several languages depending on its respective market.

Target groups

Main stakeholders for OX2's communication includes authorities and municipalities, clients, partners, employees, talent, developers, governments, investors, landowners, local communities, shareholders and suppliers.

Company profile

All corporate communication must be aligned with the "OX2 Graphic guidelines".



The guidelines are for anyone who is designing, producing or commissioning OX2 branded communication.

Media

Interactions with the media is an important part of OX2's external communication. Any interaction should be aligned with the "OX2 Media instructions and guidelines".

Social media

OX2 encourages all employees to contribute to the OX2 brand reputation in social media. Employees shall consult the "OX2 Social media guideline" before acting on behalf of OX2.

Internal communication

The purpose of OX2's corporate internal communication is to provide employees with information on the Company and its activities and secure awareness about the Company's strategic direction and business targets. Every OX2 manager is responsible for communicating relevant information with employees. Employees are responsible for actively obtaining information about the Company by communicating with their managers and colleagues and by keeping updated via the Intranet.

Roles and responsibilities

The CEO is ultimately responsible for the Company's communication with the market, public and media. As information activities are fundamental for the company, the CEO has an overall responsibility for the Company's external and internal information as well as for the Company's overall relation with the media. To fulfil this task, the CEO is supported by the CFO and the Communications and Investor Relations ("IR") functions:

- i. (a)The CFO and the Communications and IR functions are responsible for disclosure of regulatory information in the form of press releases and financial reports. Regulatory press releases shall be approved by the CEO (or the person he has appointed in his stead) prior to disclosure, and financial reports shall be approved by the Board of Directors of directors prior to disclosure.
- ii. (b)The Communications and IR functions are responsible for the content on the Company's IR-website. The Communications function is responsible for drafting PR and brand related press releases that do not contain regulatory information. Country managers are responsible for local PR press releases and related communication. The Communications function is also responsible for the content on the Company's non-IR websites.
- iii. (c)The Chief Commercial Officer is responsible for communication with parties when investigating new projects to develop.
- iv. (d)Head of Transactions is responsible for communication with stakeholders within the transaction process. The content in new presentations shall be approved by CFO, the Communications or IR functions.
- v. (e)The Chief Strategy Officer is responsible for business contacts regarding new markets and new technologies.

Spokespersons

Area of communication	Spokesperson
Shareholder issues	Chair of the Board of Directors
Group-wide information, financial development, acquisitions and divestments and questions about major investments. Strategic changes Group-wide information, operational matters and strategy	CEO, Communications function or IR function
Financial information	CFO, Communications function or IR function
Transaction-related matters	CEO
Country-specific matters	Country Manager
Project related matters	Project Manager
Sustainability information	Head of Sustainability or Communications function
General media relations, advisory function and coordination in crisis management IR related and Non-regulatory information	Communications function or IR function
IR related questions, IR -website	IR function or Communications function
Any relevant employee approved by the Communications function for non-regulatory information	Others

Crisis management communication

In the event of a crisis and negative publicity, it is always the CEO, Chief Communications Officer or a person appointed by the CEO who decides on the media strategy, or if the particular issue concerns either of them, the chair of the Board of Directors or a person appointed by the chair of the Board of directors.

It is appropriate that the CEO, Chief Communications Officer or the person appointed by the CEO convenes a “crisis group”. The CEO and the Chief Communications Officer or other communications function should always be included in such group.

Internal information shall be distributed immediately to relevant functions and through an information structure, and this is the responsibility of the Communications function.

Examples of factors which can cause the crisis organisation to be implemented are:

- Risk of serious damage to the Company’s reputation or image.
- Major issues within the fulfilment of applicable laws and regulations, for example stock exchange rules.
- Lack of judgement by executive personnel.
- Significant financial damage or risk of such.
- Inappropriate or discriminating behaviour by managers or employees.

Insider information: It shall always be considered whether the crisis constitutes inside information, in which case the information shall be handled in accordance with the Company’s guidelines for handling of inside information (see Appendix A).

Further reading: For detailed guidelines please refer to “OX2 Crisis management policy”.

Inside information and other disclosure obligations

OX2 shall, as a public company listed on Nasdaq Stockholm, comply with specific rules and regulations applicable such as the Market Abuse Regulation and the Nasdaq's Rulebook for Issuers.

In addition to ensuring regulatory compliance, OX2 holds ambitious objectives in upholding ethical behavior. The Board of Directors has established and adopted this Policy as part a commitment towards maintaining a high level of ethics and ensuring that OX2 maintains a positive reputation in the eyes of the public and the capital markets. Furthermore, a crucial step in fulfilling the intended purpose of this policy is to ensure that insider information is handled in a manner that does not undermine the policy's objectives.

What constitutes inside information?

Inside information refers to information of a precise nature which have not been made public, relating directly or indirectly to the Company or its financial instruments which, if it were made public, would be likely to have a significant effect on the price of financial instruments issued by the Company or on the price of related financial derivative instruments. In simpler terms, inside information is information that a reasonable investor would consider when deciding to invest or divest in OX2's shares, debt instruments, derivatives or other linked financial instruments.

Responsibility of all OX2 employees

All individuals who work with OX2, including employees, contract employees, and agency personnel working at OX2 premises or under the direction of OX2, as well as directors, including members of the Board of Directors, must familiarize themselves with and comply with applicable insider laws and regulations in effect at any given time. All individuals are required to consistently handle company-related information, particularly inside information, with utmost care. This entails ensuring that such information is managed in a manner that prevents unauthorized access.

For more extensive and detailed information about OX2's framework for handling insider information, including templates, please refer to Appendix A: 'Guidelines for handling of inside information and other disclosure obligations' and Appendix B: 'Insider guidelines for board members and employees'.