

OX2 Communication and insider policy

This Communication and insider policy was adopted by the Board of directors of OX2 AB at the board meeting held on 5 May 2021.

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Appended documents

The documents below are appended to this “OX2 Communication and insider policy” (the “Policy”). Please refer to these documents for more detailed guidelines for each area:

- OX2 Code of Conduct
- OX2 Communication strategy
- OX2 Crisis management policy
- OX2 Media guidelines
- OX2 Graphic guidelines
- OX2 Social Media guideline

In addition, the Company has established guidelines for the handling of inside information and other disclosure obligations, see **Appendix A** (including its sub-appendices) and guidelines for board members’ and other employees’ handling of inside information, including certain other obligations (such as reporting requirements and trading prohibitions), see **Appendix B** (including its sub-appendices).

Development, dissemination and application of the Communication and insider Policy

The CEO is responsible for the development and necessary updates of this Policy. The CEO has delegated responsibility for the dissemination and application of the Policy to the Communication function.

The policy must be revised if necessary. The Communication 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.



1. Introduction

- 1.1 This Policy sets the guidelines for all internal and external communication. All communication from OX2 AB (publ) 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. The communication must support the company's vision, strategy and business model by conveying a correct picture of OX2, the business areas' operations and is characterized by the company's values.
- 1.2 OX2 AB, (the "**Company**" or "**OX2**"), shall as a public company listed on Nasdaq First North Premier Growth Market 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 First North Growth Market – Rulebook as well as any other applicable rules and regulations that apply to Swedish public companies that are listed on Nasdaq First North Growth Market. The Company shall also comply with any requirements under Nasdaq Nordic Main Market Rulebook for Issuers once and if the Company's share is admitted to trading at such listing venue.¹
- 1.3 The purpose of this Policy is to ensure the high quality of both internal and external information as well as compliance with laws, rules and agreements.
- 1.4 The Policy applies to the Company and all subsidiaries to the Company.

2. Fundamental principles

- 2.1 OX2 fundamental principle is to provide correct, relevant, clear and reliable information to all relevant interested parties.
- 2.2 For more information on OX2's communication strategy, please refer to "OX2 Communication strategy" in OX2's policy package, which includes the Company's purpose, SWOT, Key messages, Budgets, Project plan and schedules etc.

¹ While the Company is listed on Nasdaq First North Premier Growth Market, such compliance requirement is instead stipulated in Nasdaq First North Growth Market – Rulebook, Appendix F.

3. Communications activities

3.1 Purpose of the Company's communication activities

OX2's communication shall be fast, transparent, objective, well-structured, well-planned and:

- 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 the image of OX2 and strengthen the confidence of the OX2 brand, offer, employees and management.

3.2 Communication channels

The Company's tools for external and internal communication as well as mass media relations can include:

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

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

4. Target groups

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



5. The Company's profile

All corporate communication is based on the "OX2 Graphic Guidelines". The guidelines are for anyone who is designing, producing or commissioning OX2 branded communication. The document covers OX2's visual assets and production material. It also includes implementation examples to help visualise the OX2 brand.

6. Responsibility for information

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:

- (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.
- (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.
- (c) Head of Development is responsible for communication with parties when investigating new projects to develop.
- (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.
- (e) The Chief Strategy officer is responsible for business contacts regarding new markets and new technologies.

7. Social media

- 7.1 The "OX2 Social Media Guideline" provides a framework for using social media. OX2 encourages all employees to contribute to the OX2 brand reputation in social media. OX2 believes that social media interactions can help employees to build stronger, more successful business relationships. Employees shall consult the "OX2 Social Media Guideline" in the OX2 policy package before acting on behalf of OX2 or when commenting or posting as an OX2 employee.



8. 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
Financial information	CFO and IR function
Transaction-related matters	CEO
Country-specific matters	Country Manager
Project related matters	Project Manager
Sustainability information	Head of Sustainability
General media relations, advisory function and coordination in crisis management IR related and Non-regulatory information	The Communications function
IR related questions, IR -website	The IR function
Any relevant employee approved by the Communications function for non-regulatory information	Others

9. Media

For information on OX2's guidelines for handling media, please refer to "OX2 Media instructions and guidelines" in the OX2 policy package, which includes information on what to consider when interacting with the media.

10. Internal communication guidelines

- 10.1 The purpose of OX2's Corporate internal communication is to provide employees with information on the Company and its activities. 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.
- 10.2 The internal communication is limited to the rules regarding inside information described in "Appendix A - Guidelines for handling inside information and other disclosure obligations" and "Appendix B - Insider guidelines for board members and employees".

11. Handling of inside information and other disclosure obligations

11.1 Guidelines for handling of inside information and other disclosure obligations

- 11.1.1 As stated above, the Company has established guidelines for the handling of inside information and other disclosure obligations, see Appendix A (including its sub-appendices).
- 11.1.2 The guidelines are mainly directed at the CEO, the CFO, IR function and other persons within the Company that regularly work with the Company's handling of inside information. The guidelines are determined and managed by the CEO, CFO and the Communications and IR functions ("**Insider Committee**"). The CEO (or the person he has appointed in his stead) after consultation within the Insider Committee has the main responsibility to determine what constitutes inside information, how such information is handled, and approves such information for distribution.

11.2 Insider guidelines for board members and employees

- 11.2.1 As stated above, the Company has also established guidelines for board members' and other employees' handling of inside information, including certain other obligations (such as reporting requirements and trading prohibitions), see Appendix B (including its sub-appendices).
- 11.2.2 The Company shall ensure that all board members and employees read and understand the insider guidelines.

12. Crisis management

- 12.1 In the event of a crisis and negative publicity, it is always the CEO 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.
- 12.2 It is appropriate that the CEO or the person appointed by the CEO convenes a “crisis group”. The CEO should always be included in such group. It should then be decided whether a “press service” for the matter in question should be established.
- 12.3 Internal information shall be sent immediately, and this is the responsibility of the Communications function. Issues that are dealt with in this way should always be evaluated internally when completed so that preparedness can be constantly improved. This also applies to subjects that are exposed to extremely strong media coverage.
- 12.4 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.
- 12.5 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).
- 12.6 For information on management of acute workplace crises, please refer to “OX2 Crisis management policy”.