

## 500 Communication policy

15.12.2022

Approved by the Axactor Board

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## 1. Purpose

The purpose of this policy is to clarify Axactor's ambitions for its communication activities, key principles, roles and responsibilities.

When performed correct and with high quality, communication can contribute to Axactor's success in the following ways:

- a. Spread knowledge, understanding and confidence of the company, its values and its management.
- b. Build and develop the company's reputation and avoid that the company's reputation is harmed.
- c. Ensure that all shareholders and other financial market players are treated and informed equally, and that the information is consistent, reliable and not misleading.
- d. Handling crises situations and other demanding and or challenging situations.
- e. Promote transparency and internal information
- f. Create pride, pleasure and job satisfaction, and make Axactor attractive as an employer, in all our markets.

This communication policy also encompasses certain routines that constitute a complement to, and are subordinated, the rules on handling of inside information set forth in the Insider policy, which, for example, governs which information is to be deemed as inside information and who is responsible to decide on disclosure of inside information.

## 2. Target group

This policy, related procedures and supporting documents applies to all Directors of the Board, employees, including temporary employees, legal entities within the Axactor Group and where applicable to consultants and subcontractors, pursuant to the Axactor corporate governance policy.

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### **3. Governing principles**

#### **3.1 Roles and responsibilities**

In Axactor, communication is always a management responsibility and an important part of Axactor's leadership. All managers in Axactor must be familiar with the content of this document.

Axactor's spokespersons are the Chair of the Board, CEO, and Chief of Strategy and IR. The country manager is the media spokesperson in his/her respective country and shall answer media questions within their area of responsibility. Consultations must always take place with Chief of Strategy and IR or with CEO prior to giving information which could be business sensitive. Any other person must seek approval from one of them before communicating with journalists and the media and/or give official statements, unless otherwise is agreed. All investor contact and investor relations activities shall be conducted by the IR team only, and in accordance with the Insider policy. The IR team comprises the CEO and Chief of Strategy & IR. Chief of Strategy & IR is head of investor relations.

Breach of the principles in this policy can lead to disciplinary action, up to and including termination of employment.

#### **3.2 Principles for communication**

Axactor's communication activities shall be characterized by the following basic principles:

##### **Openness/Transparency**

In most cases, transparency and openness has a positive effect, both internally and externally. When Axactor considers it appropriate, it will try to provide insights into facts, considerations and decisions.

##### **Honesty**

Axactor will always tell the truth, and never lie or distort facts. The company has no obligation to provide all the facts, but what it says must be true and to the best of its knowledge. In demanding situations, it may be appropriate to refuse to comment.

##### **Consistency**

Axactor speaks with one voice. The company's conducts and messages are uniform and consistent, and target groups shall always recognize our attitudes and messages.

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**Availability**

All shareholders, media, employees and other stakeholders should always experience high availability in their contact with Axactor and Axactor's management.

In addition to the rules set forth in this Group policy, there are binding rules on communication and disclosure of information to the capital market in the EU Market Abuse Regulation (the "Market Abuse Regulation"), and similar rules for the Oslo Børs. All Axactor's communication affected by these rules must in addition to the above be based on these principles:

- **Proactivity** – The communication aspect must be considered in all decision-making, whether it involves a board-, company-, business unit- or department issue. Through active communication, Axactor has a greater chance to set the agenda for Axactor's communication.
- **Timeliness** – Information must be provided promptly, so that Axactor's intentions and messages can be communicated.
- **Reliability** – Information must be factual, accurate and not misleading.

These principles also have a bearing on the internal communication processes. All managers and project managers working with projects or other business events of a strategic importance must ensure that proactive, timely and reliable information reaches the relevant communication department in order for Axactor to live up to applicable rules. Without prejudice to Axactor's obligations to disclose inside information under applicable disclosure rules Axactor must avoid disclosing information that falls within one of the following categories:

- Confidential information
- Commercially sensitive information
- Third party information, unless it has an impact on or relates to Axactor's business
- Information of any kind that might intrude upon the personal integrity of an individual

**3.3 Stakeholder based communication**

The key to success in any business is to have good relations with important stakeholders such as customers, vendors, partners, investors and debtors. Understanding of important stakeholders and their concerns is key to excellent communication, and highly prioritized by Axactor's management.

To achieve the best results, communication activities must be adapted to the target audience concerned, and everything the company communicates must be considered relevant to each of the stakeholders.

When communicating with journalists no information is to be disclosed “off the record” and all information provided shall be deemed official.

**3.3.1 Main channels for Axactor’s corporate communication**

Axactor’s main communication channels are:

<b>Target group</b>	<b>Main channels</b>	<b>Responsible person</b>
Investors / shareholders / analysts	Stock Børs notifications Investor- and analyst meetings Financial presentations Financial reports Webpage Newsletters	Chief of Strategy & IR
Public	Webpage	Chief of Staff / Marketing & communication Manager
Oslo Børs	Formalized and informal, running dialog Relation to Axactor’s contact person at Oslo Børs	Chief of Strategy & IR
Journalists and Media	Stock exchange notifications Press releases for group and countries aimed at the press and journalists Financial presentations Financial reports One-to-one meetings	Chief of Strategy & IR / Country managers
Employees	E-mails Calls Meetings (face to face) Town hall meetings Yammer	Each employee
Employees	People Hub	Marketing & communication Manager / Country managers / HR
Banks / Financial institutions	Regular, running contact Meetings	CFO

	Financial presentations Financial reports	
Debtors	Debtor portal E-mails Calls	Collection advisors

### **3.4 Inside information**

Investor relations refer to contacts between the company and its shareholders, both current and potential, as well as analysts and brokers. Axactor’s investor relations aim to enhance shareholder value while complying with applicable rules. For Axactor to honor its obligations and ensure that no inside information is leaked, it is required that the Chief of Strategy & IR is involved and is provided with timely information well in advance of activities involving investor relations.

It is Axactor’s IR team that decides on any disclosure of inside information. No information constituting inside information can be disclosed, or in any other way be made available, in any other way than what is set forth in the Insider policy. The Insider policy also outlines which information that must be disclosed.

Market rumors or media speculation regarding Axactor may occur even if the rumors are groundless. Generally, Axactor shall not comment on market rumors. Where a rumor explicitly relates to inside information that Axactor has delayed disclosure of in accordance with the Insider policy and where that rumor is sufficiently accurate to indicate that the confidentiality of the information is no longer ensured, the IR team shall decide whether the information is to be disclosed.

### **3.5 Axactor’s website**

Our website is the hub of our external communication and informs about who we are, what we deliver, and what we stand for, for a wide target group. Facts about the group and our countries’, as well as IR communication form the basis for the external website.

Group Communication is overall responsible for the external website and Axactor’s online image and content, including the corporate governance section. Local Marketing and Communication managers are responsible for content and the daily publication on each country's website. Changes to the structure and the visual footprint shall always be aligned with Group communications.

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The website shall be kept updated in accordance with the requirements from the Oslo Børs.

On Axactor's website on group level, there must be an easily identifiable section for press releases. Under this section, press releases are to be presented chronologically, clearly setting forth date and time for disclosure. It must be clear to the visitors which press releases that contain inside information, and which do not.

All disclosed information must be made available on the website as soon as possible after the disclosure and must be available on the website for at least five years. Financial reports must however be available on the website for at least ten years after the disclosure. The access to inside information cannot be limited for any person within the EEA or entail any costs for the users.

The website should contain a special corporate governance section. The corporate governance section of the website is to include the company's current articles of association, along with any other information required. Ahead of the annual general meeting, updated information regarding directors of the board, the CEO and the auditor shall be published. The corporate governance section is also to include corporate governance reports from the establishment and up to the ten most recent years, together with the part of the audit report which deals with the corporate governance report or the auditor's written statement on the corporate governance report.

Axactor shall on its website publish a financial calendar listing the dates on which the company expects to issue financial reports, the date of the annual general meeting and the week when the publication of the annual report is expected to occur. The calendar is to be published on the website before the start of the relevant financial year. In the event a disclosure cannot be made on the predetermined date, the issuer must publish information about the new date. To the extent possible, the new date is to be published at least one week prior to the original date.

Axactor shall also publish relevant information regarding its compliance and activities related to Environmental, Social and Governance ("ESG") initiatives, as well as the company's remuneration policy and remuneration to the executive management over the past five years.

### **3.6 Social media and other digital channels**

Axactor has developed a social media procedure for all employees to follow whenever contributing to online social computing platforms where there are references to or a potential impact on Axactor.

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### **3.7 Internal communication**

Considering the limitations stated by the rules of inside information, Axactor's employees must secure a continually open and interactive flow of information at and between each organizational level, supported by adopted procedures and flexible and adequate channels. Axactor shall have in place efficient internal communication channels. For everyone to have a good experience of the use of these internal communication channels, please observe these simple rules:

- Confidential information must not be shared on the intranet. This includes personal information about debtors, proprietary information about clients, financial information about Axactor etc.
- When posting photos or videos of other people, make sure you have their consent before putting it online
- Do not post photos, videos, links or text that is offensive or illegal
- Act like a professional. Do not bully or speak ill about colleagues, debtors, customers, partners or competitors
- If you are in doubt whether something is ok to post or not – you should not post it

In order to maintain the safety and security of the internal communication channels, and avoid damage to Axactor, we may make random searches for confidential information in the system, including closed groups, personal profiles and work-chats or similar functionalities.

### **3.8 Crisis communication management**

Occasionally, a company may deal with a set of circumstances that, owing to their uniqueness, lie outside the normal standard operating procedures. Such incidents are typically external in nature and often of such impact to be labelled a crisis. Crises communication management shall be a part of the Business Continuity Plan (BCP), ref. the BCP procedure.

Group communication is responsible for keeping an up-to-date overall crisis communications plan. The local marketing and communication manager shall be a member of the local crisis team and is responsible for keeping the local communication plan updated. If a crisis occurs, all journalist questions must be referred to the relevant Axactor communication channel.

### **3.9 Brand management – visual identity**

The brand Axactor and Axactor's logo are valuable intangible assets that carry the goodwill value of Axactor. Therefore, it is essential that all communication promotes the brand and that logotype are used consistently. A strong Axactor brand is key to maintain a positive company reputation.

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The visual brand identity shall also be attended to in a correct manner in all types of printed material and electronically communication – internally and externally.

As part of the managing of our brand, a manual regulating the overall visual identity of the company has been developed. This is to be followed in all external and internal communication, ensuring a unified image.

Axactor should only associate with brands and partners that recognizes Axactor’s ethical values, and insofar as the promotion is relevant to achieve our business goals. When a customer is preferred to be used as a reference case for Axactor, to be profiled on our web site, in slide decks and presentations, the customer must first give their express and written consent. If possible, the consent should apply to use in all Axactor countries.

## 4. Group procedures and supporting documents

This policy has the following procedures and supporting documents:

- Social media procedure
- Branding guideline

### Review log

Version	Date	Changed by	Comments
1.0	28.11.2018	Vibeke Ly Siv Farstad	Board approval
2.0	12.12.2019	Vibeke Ly and Siv Farstad	Board approval
3.0	15.12.2020	Viola Hellstrøm and Vibeke Ly	Board approval
4.0	15.12.2021	Vibeke Ly	Board approval; simplifications.
5.0	15.12.2022	Chief of Staff / MarCom manager	Minor updates and clarified responsibility for BCP